

**IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
PENNSYLVANIA**

<p>Chris Sevier</p> <p>Plaintiff</p> <p>V.</p> <p>Cox Communications Inc., Comcast Corporation Inc., Time Warner Cable Inc., American Telephone & Telegraph Inc (AT&T Inc.), American Civil Liberties Union, American Library Association, Helen Rogers, Bridget Bittman, Cyndi McKenzie Sherwood</p>		<p>CASE NO:</p>
---	--	------------------------

COMPLAINT

The eye is the lamp of the body. If your eyes are healthy, your whole body will be full of light. Matthew 6:22

I.

INTRODUCTION

NOW COMES I, Chris Sevier, former Army Judge Advocate, combat Veteran of Operation Iraqi Freedom, and Eagle Scout for a complaint for damages and injunction against Internet Service Providers and their co-conspirators. ISP filtering is happening in the United Kingdom; ISP filtering will be established in the United States. ¹ Like (1) Flux Pavilion and Steve Aoki, (2) Ed Sullivan and the Beatles, (3) Roosevelt and Churchill, (4) General Patton and General Montgomery, (5) Tim Keller and C.S. Lewis, the United States will collab with our brothers and sisters in the UK to make the world a better place in this freedom of consumer choice matter.

The complaint is filed in state where Comcast is headquartered under (1) 18 U.S. Code

§§1961-1968 violations of the R.I.C.O act - sections 1341, (relating to mail fraud); 1343,

¹ The first thing that President Obama did when he took office was to return a bust of Winston Churchill back to the United Kingdom. By filing this lawsuit against the ISPs I am effectively taking that bust back in declaring that we shall join a joint task force the United Kingdom and Canada to push pornography back underground where it belongs. I expect France, Germany, and other allied states to join this task force.

(relating to wire fraud); sections 1461–1465 (relating to obscene matter); and section 1511 (relating to the obstruction of State or local law enforcement); sections 1581–1592 (relating to peonage, slavery, and trafficking in persons); under (2) Tennessee Products Liability Act of 1978, T.C.A. § 29-28-101, et seq. and T.C.A. § 29-28-105; under (3) the Lanham Act 15 U.S.C. § 1051 for false advertising; under (4) breach of implied warranties (T.C.A. § 47-2-316), under (5) deceptive trade practices, TCA §§ 47-18-101 et. seq.,² and other tort violations to include strict liability, negligent failure to warn, negligent failure to test, and fraudulent concealment. This case is not about censorship, it is about consumer choice.³ The ISPs are not give adults the ability

² Pornography that is otherwise being pumped into our homes and on to our persons 24/7 through the laptops and cell phones sold by the Defendants and their co-conspirators must be made harder to access in light of (1) the realities of our human design, (2) the brain science of dopamine, and (3) the evidence that pornography is part of a seamless interconnected continuum with sex trafficking, child exploitation, sexual orientation modification, and sexual compulsive promiscuity, which has created a public health crisis and silent epidemic in America and across the globe. Every time the ISP sell one of their products without activated filters, they violate the display obscenity laws.

³ Here are the types of declarants and witnesses who will appear in this case:

- a. Pornography Addiction: A supranormal stimulus considered in the context of neuroplasticity – Dr. Donald Hilton.
<http://pornharms.com/video-pornography-addiction-supranormal-stimulus-considered-context-neuroplasticity-dr-donald-hilton/>
- b. Sex, Identity, and Intimacy in a Porn Culture – Gail Dines, Ph.D.
<http://pornharms.com/video-sex-identity-intimacy-porn-culture-gail-dines-ph-d/>
- c. Long Term Consequences of Pornography Use – Mary Anne Layden, PhD
<http://pornharms.com/video-long-term-consequences-pornography-use-mary-anne-layden-phd/>
- d. A Public Health Approach to Pornography Crisis – Cordelia Anderson, MA
<http://pornharms.com/video-public-health-approach-pornography-crisis-cordelia-anderson-ma/>
- e. Pornography and the Colonization of Childhood – Sharon Cooper, MD, FAAP
<http://pornharms.com/video-pornography-colonization-childhood-sharon-cooper-md-faap/>
- f. Dr. Patrick Carnes:
https://www.youtube.com/watch?v=i1pQfGD_MQI
- g. Gary Wilson
<https://www.youtube.com/watch?v=wSF82AwSDiU&list=PLcB5xCSErGFdsVmb5KsNwb7KgefFglsC3>
- h. Shelley Lubben Pink Cross Foundation
<https://www.youtube.com/watch?v=xGdMi-oC9nM&spfreload=10>
- i. Jessica Harris -Beggars Daughter.
<https://www.youtube.com/watch?v=cF1f1yzsQTo>
- j. Matt Fradd
<https://www.youtube.com/watch?v=xhkRbsmCv1s>

to choose whether or not unwanted pornography can access them.⁴ ISPs have the ability to zone pornography to unused ports and to provide filters. This case is also about consent. Consumers are not necessarily consenting to the damaging impact that pornography is having on their brain, biology, and emotional health. By the flip of a switch, ISPs have the ability to cut the flow of unwanted pornography infiltrating homes and businesses 24/7. Just as the electric company has the ability to “cut the power off,” the ISPs have the ability to “turn off” pornography. Unless pornography is specifically requested by adults, the context should be blocked. With or without filters a censorship is taking place. Either decency is being censored or obscenity. The two cannot persist together. There is something inherently wrongfully invasive with having porn pop ups appear while watching a Billy Graham sermon. Failing to provide consumers with a choice violates a scarred and fundamental liberty interest to be free from addiction and the damage of a defective product. It is an injury itself for the device maker to burden the consumer with the onus to self-censor under the totality of the circumstances and existing law. That is not merely the way I feel about it that is the existing law. (see obscenity statutes). The United States must stop listening to Hollywood and come to terms with the reality of the human heart. The human heart is not a garden plot, it is an infinite deep. Predatory pornographers are too aggressive in forcing interactions with their damaging content. I am not trying to be a “kill joy.” I hope to increase joy. The content that we plug into has the ability to materially alter us. Kids have gone from Dr. Suss to porn, and it must stop. Pleading in this case is very difficult because it involves understanding neurology, technology, and a multilayered enterprise. The subject matter is itself a

⁴ To even suggest otherwise is evidence of the very dishonest and depraved heart syndrome manifested by mankind that itself warrants the necessity for filters that will protect children and give adults the option as to whether they want pornography to access them.

bit triggering and the matters extensive. I ask for leeway from the Court in pleading the complaint in two parts. This is a case of first impression with lasting impact. In the first part, I have to lay down the frame work. The second part will read more like a traditional case. Also, for clarities sake, when I refer to the “Defendants” in this complaint, I am referring primarily to the ISP Defendants, (AT&T, Comcast, Time Warner, and Cox Communications). However, there are moments where I am inferrable that I am referring all of the Defendants or some of them and I expect all inferences to resolve in my favor.

TABLE OF CONTENTS

PART ONE **FRAMING THE CASE**

.....	10
I. LAYING THE FOUNDATION	10
.....	10
A. “We Are Not Legislating Morality, We Are Protecting Women and Children” Prime Minister Cameron	10
.....	10
B. “We Must Push Porn Back Underground From Whence It Came” Donna Rice from Enough Is Enough	11
.....	11
C. “Pornography Is Driving Technology” Gail Dines from Stop Porn Culture	12
.....	12
D. Coca Cola And Cocaine	12
.....	12
E. “We Are Living In The Midst Of A Sexual Holocaust” Dr. Mary Anne Layden	13
.....	13
F. Nader’s Raiders And The Auto-Industry And Tobacco Industry Parallel	14
.....	14
G. If You Are Pro-porn You Are Pro-bad Sex, Child Molestation, And Human Trafficking = There Is No Freedom In That So Stop Saying That There Is	15
.....	15
H. “Burden Shifting Off Of Parents and Children and Onto The Pervs” Girls Against Pornography	16
.....	16
G. “Shoehorning Obscenity Into the Free Speech Box Has Failed”	17
.....	17

I. “Sex Trafficking Is Modern Day Slavery” Truckers Against Trafficking19

**II. CRUSHING THE PUBLIC RHETORIC WITH THE FORCE OF EXISTING LAW
CREATED BY THE UNITED STATES SUPREME COURT
TIMELINE (PROCEDURAL HISTORY)5**

A. 1940s Kinsey22

B. 1964 “I know it when I see it”23

C. 1968 Ginsberg23

D. *Miller* (1973)25

E. 1991 Secret Meeting Between Jobs and Gates26

F. Mid 90s CDA26

G. 1999 COPA27

H. 2002 *Ashcroft v. Free Speech Coalition*29

I. 2013 *Apple*29

J. 2014 *Google*31

K. Math Formula31

L. Solution32

L. I’m Already Working On A Bill For Filter Legislation At The State Level In Alabama34

III. PRELIMINARY INJUNCTION FACTORS34

A. PUBLIC’S INTEREST37

(1) THE MILITARY NEEDS THE INJUNCTION38

(2) CHILDREN, TEENAGERS, YOUNG ADULTS OF THE CURRENT GENERATION AND39

(3) THE VICTIMS OF HUMAN TRAFFICKING NEED THE INJUNCTION44

(4) THE VICTIMIZERS OF SEX RELATED CRIMES NEED THE INJUNCTION	47
(5) SCHOOLS AND TEACHERS NEED THE INJUNCTION	49
(6) MARRIED COUPLES NEED THE INJUNCTION	51
(7) THE INTERNATIONAL COMMUNITY NEEDS THE INJUNCTION	52
(8) THE TRADITIONAL PORN INDUSTRY NEEDS THE INJUNCTION	54
(9) THE VICTIMS OF AMATEUR, REVENGE, IMPULSE, THEFT PORN, AS WELL AS FORMER PORN STARS NEED THE INJUNCTION	55
(10) THE CHURCH NEEDS THE INJUNCTION	56
(11) PARENTS NEED THE INJUNCTION	61
(12) THE DEVICE MAKERS AND ISPS NEED THE INJUNCTION	62
(13) THIRD PARTY FILTERING COMPANIES NEED THE INJUNCTION	64
(14) ANTI-PORNOGRAPHY AWARENESS GROUPS NEED THE INJUNCTION	66
(15) LAW ENFORCEMENT NEED THE INJUNCTIONS	68
(16) THE FEDERAL COURTS AND CONGRESS NEED THE INJUNCTION	69
B. BALANCING EQUITIES	74
C. IRREPARABLE HARM	75
D. LIKELIHOOD OF SUCCESS ON THE MERITS	81
IV. FRAMING THE FACT THAT PORNOGRAPHY ADDICTION IS REAL	82
The Truth vs. The Lie	86
Simple Negligence Might Be The Most Important Cause Of Action	
89V. FRAMING PRODUCTS LIABILITY	90
Cigarette Vending Machines	90

Device Makers Products Amount To An Electronic Playboy Magazine 91

The Internet Is Merely Part Of A Sum That Is the Device 92

False Apprehension Of Safety And The Misdirection Embodied In Inept Parental Controls On Device Maker Products: 92

Parental Controls Provide No Safety For the Primary Purchaser 93

FIDUCIARY RELATIONSHIP 94

VIOLATIONS OF PERFECT GOOD FAITH: 95

FAILED TO OPERATE AS EXPECTED 96

THE TECH COMPANIES ARE IN BED WITH PREDATORY PORNOGRAPHERS AND EACH OTHER 97

ESTABLISHING THAT THE DEFENDANTS' PRODUCTS WERE DEFECTIVE UNDER TENN. CODE ANN. § 29-28-102(2) 98

BREACH OF DUTY ELEMENT 99

INSTRUMENTALITY WITH THE DEFENDANTS CONTROL ELEMENT OUTRAGEOUSNESS ELEMENT OF PRODUCTS LIABILITY TORT IS PRESENT HERE 100

XI FRAMING THE ELEMENTS OF RACKETEERING 103

The Formation of the Enterprise and the Nature of the Conspiracy 104

The Present and Continuing Threat To The Public 108

PART TWO

THE PRIMARY COMPLAINT 112

VII. JURISDICTION AND VENUE 112

VIII. PARTIES 113

XI. FACTS 115

X. SECTION CAUSES OF ACTION 131

COUNT ONE DEFENDANTS' LIABILITY FOR VIOLATIONS OF THE RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS STATUTE	131
.....	131
The Enterprise Manner and Means	132
.....	132
COUNT TWO' VIOLATIONS OF TITLE 18, UNITED STATES CODE, SECTION 1962(d); CONSPIRACY TO VIOLATE TITLE 18, UNITED STATES CODE, SECTION 1962(c)	
.....	
140THE PATTERN OF RACKETEERING ACTIVITY	141
.....	141
OBSCENITY VIOLATIONS AND RACKETEERING	147
.....	147
RACKETEERING AND SEX TRAFFICKING	155
.....	155
COUNT THREE (STRICT LIABILITY) PRODUCTS LIABILITY (DEFECTIVE DESIGN; FAILURE TO WARN) T.C.A. § 29-28-101 et seq.	158
.....	158
COUNT FOUR: PRODUCTS LIABILITY (DEFECTIVE DESIGN; FAILURE TO WARN)	159
.....	159
COUNT FIVE SIMPLE NEGLIGENCE - SHIFTING THE BURDEN TO SELF-CENSOR ON THE BUYER	161
.....	161
COUNT SIX: BREACH OF THE DUTY OF GOOD FAITH AND FAIR DEALING (NEGLIGENT FAILURE TO TEST AND WARN, NEGLIGENT FAILURE TO FILTER, STRICT LIABILITY)	162
.....	162
COUNT SEVEN: RES IPSA LOQUITUR RELATING TO PERSONAL INJURY (NEGLIGENT FAILURE TO WARN, NEGLIGENT FAILURE TO TEST, FRAUD, STRICT LIABILITY, IMPROPER BURDEN SHIFTING, FAILURE TO FOLLOW OBSCENITY LAWS)	163
.....	163
COUNT EIGHT: Defendants' Liability for Breach of Manufacturers' Duties, Deceptive Trade Practices, Including Failure to Warn, Failure to Test, Sale of Defective and Unreasonably Dangerous Products (Strict Liability, Negligence, and Breach of Implied Warranty)	167
.....	167
COUNT NINE ” Defendants' Liability for Violations of State Consumer Protection Statutes (Unfair, Unconscionable, and Deceptive Acts or Practices)	173
.....	173
COUNT TEN CIVIL CONSPIRACY	176
.....	176
COUNT ELEVEN: FEDERAL VIOLATION OF SECTION 15 U.S.C. §§ 1051 ET SEQ: LANHAM ACT FOR FALSE ADVERTISING	179
.....	179

COUNT TWELVE: FALSE ADVERTISING (Tennessee Common Law) 182

COUNT THIRTEEN: NEGLIGENT MISREPRESENTATION 182

COUNT FOURTEEN INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS 182

COUNT FIFTEEN: NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS 183

COUNT SIXTEEN: OUTRAGEOUS CONDUCT 184

JOINT AND SEVERALLY LIABLE 186

PUNITIVE DAMAGES Tenn. Code Ann. § 29-39-104
 I REQUEST THAT THE COURT DEPUTIZE ME WITH ASSISTANT ATTORNEY
 GENERAL AND PROSECUTORIAL POWERS UNDER TCA § 8-7- 106 186

SECTION XI RELIEF 189

A. BIFURCATED AND JURY TRIAL 189

B. UNDER RICO 189

C. IF ALLOWED TO PROCEED ON BEHALF OF THE UNITED STATES 193

D. UNDER THE OTHER CAUSES OF ACTION I SEEK 195

PART ONE
FRAMING THE CASE

I. LAYING THE FOUNDATION

<https://www.facebook.com/video.php?v=10152899489331756&set=vb.285896596755&type=2&theater>

A. “We Are Not Legislating Morality, We Are Protecting Women and Children” Prime Minister Cameron

<https://www.youtube.com/watch?v=m1jklCmwqM>

1. This case is not about legislating morality. This case serves to cultivate the enforcement of existing obscenity laws. This action is about protecting the human heart from content that

violates the givenness of our nature.⁵ What we cannot do is to legislate away the sin nature of man, but we can respectfully “grow up” and recognize that easily accessible pornography on laptops and cell phones is eroding freedom and cultivating widespread victimization for scientific reasons.⁶ The policies of the United States must not encourage us to feed the dark side.

⁷ This Court must make the “right choice” the “easy choice” for the benefit of the public’s health.⁸ And from a scientific and evidentiary point of view, the right choice to make ISPs give consumers the choice whether or not they want pornography pumped into their homes 24/7.⁹

Ralph Yarro from Think Atomic will be the expert witness to set forth the plan.

B. “We Must Push Porn Back Underground From Whence It Came” Donna Rice from Enough Is Enough

<https://www.youtube.com/watch?v=ty9s2CIPMe8>

⁵ Yet, the truth is that laws regulating child pornography and an murder can also be said to be “legislating morality.” I am pretty sure that we have not digressed to a point where those laws are being challenged. Of course, our written law is based on morality.

⁶ I have personally learned the futility of that by operating as a Soldier in a Title 10 environment downrange. Everything you can think of is illegal in such an environment, and yet, we still had infractions.

⁷ “Sometimes, the dark side overcomes what Lincoln called the better angels of our nature.” quoting Apocalypse Now

⁸ And morality is derived from faith. The United States is a Christian Nation because Christianity is the truth period, but of course, its not politically expedient to speak the truth given our insufferable arrogance. But every time any of us enter the public square, we are all bringing a set of unproven set of exclusive views to the table. So leaving faith out of this matter is completely impossible. Not all sets of beliefs are equal. Views that parallel Christianity are always drastically superior than those that do not, and the only way to make it otherwise is to attempt to snuff out Christianity, which apparently is not working out so well. The fact that we can even have a robust debate in this matter without fear of reprisal is because we living in a Christian Nation where we are required to love our enemies.

⁹ Though we have made prayer in school illegal because apparently the we apparently have a severe emotional problem with the truth, and yet we have yet to make science outlawed. The fact that authentic science conclusively backs Christianity is not grounds to ban that either and for the same reasons. For any physician to suggest otherwise is simply the same kind of doctor who will assert that nicotine is not addictive - in exchange for the right price of course. Respectfully, it is time that America grows up, and come to terms with the fact that secularism is an unproven semi-religious faith based assumption that has failed dismally as as a basis for policy making. This action is backed by the hard and fast brain science of neurology.

2. We can no longer afford to have pornography above ground. The victims of human tracking, myself, former porn stars, wives, doctors, military personnel, teachers, lawmakers, detectives, and others will attest in this case that the Honorable Courts of the United States and the state and Federal legislature MUST push pornography back underground, where it belongs.¹⁰ We can no longer afford to have pornography interfacing with global capitalism. Porn culture is now mainstream culture (see Miley Cyrus, Modern Family, 50 Shades of Gray).¹¹ Pornography can be pushed underground again by issuing an injunction to cure my personal injury. Our citizens, to include children, are walking around with x-rated theaters in their pockets in the form of cell phones thanks to the Tech companies' illegal enterprise with each other and porn industry. Our Country is losing grip on what "right and wrong" even is as there is a blurring of lines between rape, gay sex, sex with children, infidelity, prostitution.

C. "Pornography Is Driving Technology" Gail Dines from Stop Porn Culture

<https://www.youtube.com/watch?v=CJZe0jjNsxM>

3. Most people do not know the extent to which pornography is driving technology. The Defendants and their co-conspirators attend these joint conventions with Device Makers and pornographers because technology is catering to pornography, not the other way around.¹²

Thanks to the entrenched conspiring criminal enterprise, pornography is driving technology and

¹⁰ I want a system in place that does not drive pornography out of the marketplace but instead drives pornography out of the personal lives of adults, who do not want to be exposed, and children, who are barred from viewing porn for good cause in the first place.

¹¹ In terms the current state of TV commercials, where do we go from here? Should all of us just start walking around naked so that sex loses its specialness and we become like savages?

¹² Listen to NPR put porn and tech companies together at the annual conventions. <http://www.npr.org/templates/story/story.php?storyId=6810255>

interfacing with superficial “family friendly” Capitalistic Conglomerates. (1) Live Chats; (2) Anti-Fraud Security; (3) Online Payment systems; (4) Streamed Video; (5) micro-payment systems; (6) pop ups and pop unders; mobile service; and (7) traffic optimization were all developed by the pornographers and capitalized on by the Defendants and their co-conspirators. R & D money for pornography developed these things in league with the Tech companies.

D. Coca Cola And Cocaine

If the Court hands down an injunction, the Senate Judiciary committee under Senator Hatch, Cruz, and Lee will be responsive. If Coca Cola can be forced to remove the porn ingredient from its products to protect consumers, the Device Makers and ISPs can be forced to remove the porn ingredient from theirs.¹³ 1914 Harrison Narcotics Tax Act.¹⁴ Imagine what society would be like if Congress did not make coca cola remove cocaine from its products. Congress must recognize easily accessible pornography as the internal National Security threat from within. A handful of ISPs and Device Makers are poisoning us.

E. “We Are Living In The Midst Of A Sexual Holocaust” Dr. Mary Anne Layden

<https://www.youtube.com/watch?v=m-FCjBzWw34>

4. We are living in a pornified perpetrating culture that has cultivated a public health crisis, a silent epidemic, and a sexual holocaust of unimaginable magnitude. My personal injuries stem

¹³ The Federal Legislature made Coca Cola remove cocaine from its products to protect consumers. Valerie Voons studies conclusively show that Cocaine and pornography impact the same parts of the brain: <http://yourbrainonporn.com/cambridge-university-brain-scans-find-porn-addiction>

¹⁴ The situation at hand could simply parallel the Coca Cola/cocaine one of the early 1900s. When Coca Cola first came out, it was including cocaine in its product to increase addictiveness - probably intentionally. The Congress required that Coca Cola remove the cocaine ingredient from their soft drinks in order to protect American consumer’s health. Coca Cola has not suffered as a result after removing cocaine, but consumers are healthier and safer. (see 1914 Harrison Narcotics Tax Act). The same should be true here as well. The “porn ingredient” must be removed from the laptops and cell phones by Congressional action. But it will first take the issuance of the injunction. Imagine what the world would be like if Congress had not made Coca Cola remove the cocaine ingredient from its products?

from that. The lack of regulation over ISPs, Devices, and ICANN are to blame, not “parents.” The burden of regulation must be shifted off of the buyer and placed onto the ISPs and Device Makers to sell custom made filters that are preset to block pornography that can be removed if the purchaser is over 18 and shows proof of ID at an in person encounter. The entire “blame the parents” rhetoric floated by the Defendants was a manipulative conversation started by the pornography industry and the tech companies and encouraged by an entire liberalized mass media that also backed Dr. Kinsey’s implausible research in sexology.¹⁵ The motive behind the “blame the parents game” stems from ISP and Device Maker executives wanting to avoid reasonable regulation for the same reason that the executives at Bear Stern, AIG, Lehman Brothers, and Chase did - “maximizing profits at the expense of the public.”¹⁶

F. Nader’s Raiders And The Auto-Industry And Tobacco Industry Parallel

<https://www.youtube.com/watch?v=X4HuP1uumeK>

5. My friend, Bill O’Reilly, once accused me of filing lawsuits because I was “trying to get rich” on the Factor. Civil Courts have a lot more to do with consumer health than one might think. Thanks to Ralph Nader and Nader’s Raiders, we know that the auto-industry collectively “blamed the nut behind the wheel” in refusing to provide seat belts for consumers. We know that the Tobacco companies denied that nicotine was addictive before they were sued by the state’s attorney generals. Here, the ISPs and Device Makers refuse to provide safety filters that would protect the purchaser from unwanted exposure to pornography in the same way that the auto-

¹⁵ I don’t know about you but I for one do not like getting pimped, hustled, and lied to. The ISPs and Device Makers have been able to pimp, hustle, and exploit the American public for years by framing this matter under the guise of “blame the parents.” The media outlets should do a complete about face on “blame the parents game” if they want to retain a semblance of credibility.

¹⁶ These companies collapsed and injured millions of people because they too have an irrational aversion to reasonable accountability.

industry refused to provide seat belts. The ISPs and Device Makers are using the same tactics as both the Tobacco Industry and the Auto-Industry used to push the United States towards a culture of savagery, selfishness, and addiction. Consequently, a culture of intimacy, caring, connection, virtue, purity, and honor is the casualty. “Porn kills love” as Fight The New Drug coined. Furthermore, the ISPs and Device Makers refuse to provide filters because they know that pornography is addictive. The Device Makers and ISPs know that filters allow for a temporary emotional stress outlet for the same reason that Tobacco companies know that their products do. The Tobacco companies fraudulently concealed nicotine’s addictiveness at the expense of the public’s health for the same reason that the ISPs and Device Makers concern porn’s addictiveness. The ISPs and Device Makers want consumers codependent on their products. Those who join the perverse free speech rhetoric are in on the same or deceived. Consumers need to have the freedom to choose whether or not they want to be exposed to damaging and addictive content instead of having the ISP and Device Makers patronizingly place them in a position where the choice is being made for them in the most dehumanizing way imaginable. People with values and faith are being systematically targeted - namely American Christians - by people who are void of answers, inwardly miserable, and who possess an emotional problem with the truth.¹⁷ Such individuals should not be bashed, but respectfully pitted. By nonresponsiveness of the Government in the face of the relentless violations of obscenity laws, there is a silent war on Christianity that is being waged, which grossly violates the free exercise clause of the United States Constitution and dramatically hurts the country more than we would

¹⁷ Lois Lerner at the IRS proved the realities of systematic targeting of persons of faith in this country which is a rampant problem. I have been falsely and relentlessly targeted by the ethics commission in Tennessee and the District Attorney’s offices in Nashville and Houston for filing civil lawsuit against donors to the campaigns of District Attorneys.

like to admit. Therefore, nonresponsiveness of the Government amounts to a declaration of war against the Constitution and Christians itself, and it cannot be allowed.

G. If You Are Pro-porn You Are Pro-bad Sex, Child Molestation, And Human Trafficking = There Is No Freedom In That So Stop Saying That There Is

<https://www.youtube.com/watch?v=mxJK9F0SHuQ>

6. Oh yeah, let's be clear. I, like the Church, am a huge proponent of great sex - thank you.¹⁸ But I am a proponent of sex in the right context.¹⁹ As several Federal Courts have told me directly that any other sexual union besides "one man and one woman" in marriage is "removed from reality," "meritless," and "sanctionable."²⁰ What the Judges were attempting to do was to advance same-sex marriage, what they really did was gut it. All policies of the United States should advance a healthy lifestyle choice that fit with the givenness of our nature. There is a careful balance between freedom and order but it must be balanced.

H. "Burden Shifting Off Of Parents and Children and Onto The Pervs" Girls Against Pornography

https://www.youtube.com/watch?v=lgE_soUpoXA

7. The burden should shift off those who want to avoid being exposed to pornography onto those who want to see. People who want to be exposed to pornography must be ones required to take the extra steps to do so. Those who want to avoid exposure, should not be the ones burdened to do so. The existing state and Federal obscenity laws already requires this. Further, such a

¹⁸ <http://www.churchofthehighlands.com/media/message/great-sex>

¹⁹ I am not a fan of an adult masturbating to child porn in Ms. Bittman's public library for example, with children present, even though the ALA and ACLU think such activity is "wonderful" for progress. For those who are for pornography because they are pro-sex should know that the evidence in this case will show.

²⁰ *Sevier v. Cuomo et al*, 14-cv-5380; *Brenner v. Scott*, 2014 WL 1652418 (2014); *General Synod of The United Church of Christ v. Cooper*, 3:14-cv-213. I do firmly stand by the position that if sexual orientation is a class that all variations of sexual orientation must have equal protection under the law - even the most extreme kinds because the Constitution mandates it.

position is consistent with all of our zoning laws regarding strip clubs and sexual oriented businesses (SOBs). Stripclubs are pushed to the hard to reach parts of town in light of zoning laws so that a potential patrons/victims of such establishments might have the willpower to resist the urge to pay visit. The hope is that the driver will turn the car around because of the established secondary harmful effects that SOBs attract. The civilized world can no longer afford to have pornography just one click away in light of the aggressive tactics of predatory pornographers ,who are masters at making consumers interact with content that is harmful to emotional health, mental health, reproductive health, relational health, occupational health, and community health. As it was in my case, even if a customer is not looking for pornography, pornographers are looking them. This is especially true when it comes to young adults and children. The Device Makers and ISPs not only know of these dangers, they staunchly support and welcome them. The Device Makers and ISPs know that porn addiction creates codependency on their products, and yet, they do nothing to protect their customers, when they have existing civil and criminal obligations to do so. They must provide consumers with the freedom to choose to have a safe experience when using their products, as they have marketed. We are not talking censoring politics here. We are talking about protecting children from obscenity and giving adults the choice whether or not they want to be subject to exposure to it. After all, like with alcohol, pornography is harmful to persons of all ages. If an adult consumer determines that pornography is “harmless, natural, non-addictive, and healthy,” - when it is not - they should have no problem asking the ISP to remove the filter. The demand I am making establishes a reasonable burden on the time, place, and manner of unprotected and harmful speech that is cultivated a Nation of addicts in a pornified perpetrating culture of indecency.

G. “Shoehorning Obscenity Into the Free Speech Box Has Failed”

‘You may choose to look the other way, but you can never say again that you did not know.’ William Wilberforce

<https://www.youtube.com/watch?v=jtkboPgWnI>

8. The Defendants and their conspirators shoehorn their arguments into the box of first amendment protections "free speech" violating 18 U.S.C. Chapter 110, TCA §§ 39-17-901-927, 47 U. S. C. §231 with every sale. It's not "anti-sex" to expose pornography's complicit role in child abuse, divorce, violence towards women, and human trafficking. Those who support my demand are pro-healthy sex.²¹ Fighting injustice is sexier than porn itself, as Fight The New Drug is proving by rallying the youth. The youth can see that adults set them up for exploitation by leaving them to have to navigate the porn climate online. It is downright cowardly for anyone, including the media, to oppose my demands set forth here. The United States and the world community can no longer listen to the Tech companies "wait and see" arguments that they spewed forth in Congressional inquiries like OTWG in light of the porn pandemic. We have "waited" and "seen" that pornography is connected to human trafficking, giving rise to 13th amendment slavery considerations. The Federal Court that struck down COPA must now cure it through this action. We stand at a "tipping point."²² This matter belongs in Federal Court, not in public awareness campaigns, which make the matters worse without safeguards in place in accordance with Murphy's law and the sin paradox.²³ The continuous invasion of graphic,

²¹<http://www.theguardian.com/commentisfree/2014/nov/11/its-not-anti-sex-to-want-to-expose-pornography-complicit-role-in-child-abuse-and-trafficking>.

²² The vision of Enough Is Enough's "Project Wilberforce" is to abolish the Internet-enabled sexual exploitation of children and adults and restore a culture of dignity and respect. See <http://www.enough.org/inside.php?id=1GHCH052>.

²³ I will marshal in a parade of witnesses, many of whom are part of awareness campaigns, that will supply the Court with more than enough ammo to terminate the enterprise at work for the good of mankind.

hardcore online pornography into cultures worldwide has been called the “largest unregulated social experiment in human history” and represents a hidden public health hazard we can no longer ignore. The Witherspoon Institute released “The Social Costs of Pornography: A Statement of Findings and Recommendations,” the first multifaceted, multidisciplinary, scholarly review of contemporary pornography since the advent of the Internet. The report’s findings conclude that pornography, especially via the Internet, harms children, women, and men and fuels pornography addiction, the breakdown of marriage, and sex trafficking.²⁴ Other peer-reviewed studies have reached similar conclusions.²⁵

H. “Sex Trafficking Is Modern Day Slavery” Truckers Against Trafficking
<https://www.youtube.com/watch?v=PEKCM4zXV3E>

9. Although the producers from Modern Family and Hozier would have us believe that the same sex marriage quest is the modern day slavery issue, it is not. The human trafficking matter is. The falsity of “gay rights” is making matters worse by blurring lines and falsely asserting to be on par with the race plight when it is not. To equate “gay rights” to “race rights” is itself racist because these plights are not equal. Pornography is tied to the demand side of human trafficking. Prosecution of either “jons or tricks” cannot be the first response. Prevention must be. Allowing for scumbag divorce lawyers and district attorneys to maliciously seize upon the opportunity to persecute spouses who have been victimized by the lack of safety features on devices and ISPs is outrageous. The Government’s nonresponsiveness is amounts to direct culpability for the public health crisis that Dr. Cordelia Anderson has memorialized in her research. In one sense, I feel

²⁴ I can attest first hand to the accuracy of the Witherspoon Report through the Article III standing that allows me to appear here now.

²⁵ We are going to talk about some disturbing subject matter in this case. I am going to keep porn images out of this action. I am going to make this case as clinical as possible.

like I'm pushing a boulder up a hill in this case. The anti-pornography community and I that will be part of this action could use the Court's help here to assist us shoulder this effort for the good of humanity.²⁶ Easily accessible pornography is poisoning the soul of this Country from the inside out to the point that it has created an internalized National Security threat. As Lincoln Said:

"At what point shall we expect the approach of danger? By what means shall we fortify against it?-- Shall we expect some transatlantic military giant, to step the Ocean, and crush us at a blow? Never!--All the armies of Europe, Asia and Africa combined, with all the treasure of the earth (our own excepted) in their military chest; with a Buonaparte for a commander, could not by force, take a drink from the Ohio, or make a track on the Blue Ridge, in a trial of a thousand years. At what point then is the approach of danger to be expected? I answer, if it ever reach us, it must spring up amongst us. It cannot come from abroad. If destruction be our lot, we must ourselves be its author and finisher. As a nation of freemen, we must live through all time, or die by suicide." President Lincoln; Lyceum Address (quoting dinesh d'souza's documentary "American Imagine A World Without Her.")

Filterless ISPs and devices are harming the military, families, and healthy itself. Part of the definition of sanity is the ability to know the difference between right and wrong, and pornography is blurring lines and cultivating mass insanity in the United States. This battle front here is another ideological war that has manifest itself within the borders and must be seen for the National Security threat that it is. Lets not pretend that the war in the middle east is not an ideological one. I above all here can directly attest that it is.

10. Furthermore, we do not have a "Democracy For Sale," we have a Democracy that prizes human rights first. Such is the lesson from the civil war. The civil war was about exploitation. If

²⁶ I am going to bring in a stream of therapist, victims, porn addicts, porn stars, parents, teachers, and special advocates to assist the Court in reaching a sound decision. I think the Court is going to be shocked at all that is reveal and the extent of the harm being done.

prostitution is “sex work,” then antebellum slavery is “cotton work.” “Sex work” is more traumatizing and damaging than “cotton work.” Intimacy is about the greatest currency there is. The Defendants are in the business of exploitation of humans. Somehow our culture has said that it is ok to exploit people if it is “sexual,” but that is not what the existing law says. (See the existing obscenity statutes). The Courts of the United States are not instruments of the mass media or greedy corporate conglomerates. The Honorable Courts are institutions of transcultural truth and law. “Democracy for sale” stops at the doorstep of the Federal Judiciary. Our Federal Courts are designed to remedy the break down in politics between the legislature and executive. As someone who has personally been shot at for attempting to advance the rule of law in an overseas foreign theater of war, I very much look forward to the Federal Courts here advancing the rule of law in a matter that is on par with the civil rights movement of 1964. Accordingly, this is a consumer choice and safety action, and the Court must make the Defendants provide safety and protection to end the continuing exploitation.

II. CRUSHING THE PUBLIC RHETORIC WITH THE FORCE OF EXISTING LAW
CREATED BY THE UNITED STATES SUPREME COURT

“You Can’t Handle The Truth” Colonel Jessup in a Few Good Men
https://www.youtube.com/watch?v=UXoNE14U_zM

11. Before anyone in the liberal or conservative media thinks wise to sound off about their personal “feelings” on this matter, I would first recommend that they consider the existing authority that has been established by the Courts and the legislature. Law is reason without passion after all. We are at law here. This is not a dishonorable TMZ gossip forum. For the benefit of the public, the United Kingdom, the Defendants and the Court, respectfully I will give a brief legal procedural history of the law in this case so that we can really see where we are at.

TIMELINE (PROCEDURAL HISTORY)

“The destruction of morality renders the power of government invalid, for government is no more than public order. It weakens the hands by which society is kept together. The corruption of the public mind, in general, and debauching the manners of youth, in particular, by lewd and obscene pictures...must necessarily be attended with the most injurious consequences.” Pennsylvania Supreme Court Presiding Justice Yeats, in the first Obscenity case in the United States, *Commonwealth v. Sharpless* (1815)

History Of Pornography By Fight The New Drug
<https://www.youtube.com/watch?v=ys2n8NpKo6s>

12. Before I give the timeline, there are a few things that are established that should be generally understood. First, the Supreme Court already identified the secondary harmful effects of pornography.²⁷ The Supreme Court is hardcore for regulating obscenity for cause.²⁸

A.

1940s Kinsey

<https://www.youtube.com/watch?v=B-un-M2ePCg>

²⁷ In regards to porn in the analog realm, the Supreme Court and other state and federal courts have recognized the harmful secondary effects of "hard-core porn shops" and other "sexually oriented businesses" that specialize in pornography and commercial nudity and upheld the right of cities and counties to enact zoning and licensing ordinances based on reports and studies of their destructive impact. There were at least forty such studies and reports of municipalities and state agencies that have documented such crime impacts and urban blight, including those reports from such diverse communities as Los Angeles, Cleveland, New York City, Phoenix, Minneapolis, Indianapolis, Seattle, Oklahoma City, Houston, Dallas, El Paso, Las Vegas, .Alliance, Ohio, Newport News, Virginia, Manatee County, Florida, Adams County, Colorado, and New Hanover County, North Carolina. As the Supreme Court said in the *Paris Adult Theatre* case in 1973, "The sum of experience...affords an ample basis for legislatures to conclude that a sensitive, key relationship of human existence, central to family life, community welfare, and the development of human personality, can be debased and distorted by crass commercial exploitation of sex. The States [and Congress] have the power to make a morally neutral judgment that public exhibition of obscene material, or commerce in such material, has a tendency to injure the community as a whole, to endanger the public safety, or in Chief Justice Warren's words, to jeopardize, States' "right. . . to maintain a decent society." *Paris Adult Theatre Iv. Slaton*, 413 US 49, at 63,69 (1973). As noted by the Supreme Court in *Roth v. United States*, 354 U.S. 476, at 485 n. 15 (1957), and *New Yorkv. Ferber*, 458 U.S. 747, at 754 (1982), there is an international Treaty that can be used by U.S. and other Nations to cooperate in identifying and prosecuting obscenity offenses. The original Treaty is called "Agreement for the Suppression of the Circulation of Obscene Publications", signed at Paris, May 4, 1910 In the U.S, it is reported at 37 Stat. Pt. 2, p. 1511, Treaties in Force 209 (U.S. Dept. of State), Treaty Series 559. The 1949 Protocol transferred the recording and tracking functions to the United Nations. There are now over 130 signatory countries. Pursuant to the spirit of these prosecutorial treaties, other countries can follow our standard and imposed requirements that all devices be sold with filters in effect.

²⁸ "Obscenity is not within the area of protected speech or press." *Court v. State*, 51 Wis. 2d 683, 188 N.W.2d 475 (1971) vacated, 413 U.S. 911, 93 S. Ct. 3032, 37 L. Ed. 2d 1023 (1973) and abrogated by *State v. Petrone*, 161 Wis. 2d 530, 468 N.W.2d 676 (1991);; *State v. Weidner*, 2000 WI 52, 235 Wis. 2d 306, 611 N.W.2d 684;; *Ebert v. Maryland State Bd. of Censors*, 19 Md. App. 300, 313 A.2d 536 (1973). Obscenity is not protected expression and may be suppressed without a showing of the circumstances which lie behind the phrase "clear and present danger" in its application to protected speech. *Roth v. United States*, 354 U.S. 476, 485, 77 S.Ct. 1304, 1309, 1 L.Ed.2d 1498. *United States v. Gendron*, S2-4:08CR244RWS(FRB), 2009 WL 5909127 (E.D. Mo. Sept. 16, 2009) report and recommendation adopted, S2 4:08CR 244 RWS, 2010 WL 682315 (E.D. Mo. Feb. 23, 2010);; *Chapin v. Town of Southampton*, 457 F. Supp. 1170 (E.D.N.Y. 1978);; *Sovereign News Co. v. Falke*, 448 F. Supp. 306 (N.D. Ohio 1977);; *City of Portland v. Jacobsky*, 496 A.2d 646 (Me. 1985)

From the inception of the United States until World War II, the laws of the United States in the area of sex and marriage paralleled Christianity squarely. Then a homosexual sadist, Dr. Kinsey, invented the junk science field of “sexology,” in hopes to reduce shame in the same way that the push for same-sex marriage has attempted. Its the same ongoing quest. Members of the media championed Kinsey’s research as a result of their own jadedness. Consequently, the laws on sex, marriage, divorce, and obscenity have been liberalizing ever since, but the evidence shows that this liberalization has cultivated suffering, misery, and more shame - eroding liberty interests. We are destroying ourselves from within. This is because there can be no freedom without truth, and Kinsey’s work was a complete fiction that distorted reality. To maintain journalistic integrity, I recommend that the media drop Kinsey’s child molesting views on homosexuality and embrace Joyce Meyer’s take, who is victim of incomprehensible sexual assault.

B. 1964 “I know it when I see it”

<https://www.youtube.com/watch?v=XEpZhD6IPXM>

13. The proponents of easily accessible pornography will attempt to assert “what is pornography” as a defense. The ACLU and ALA love that defense. In the same way that the ALA and ACLU do not know how to define pornography, they do not know how to define the “truth” either so they are better off if they just stop talking. In *Jacobellis v. Ohio*, 378 U.S. 184 (1964), the Court stated, “I shall not today attempt further to define the kinds of material I understand to be embraced within that shorthand description [“hard-core pornography”], and perhaps I could never succeed in intelligibly doing so. But I know it when I see it.” Those who say that we should not regulate pornography because we do not know what it is are the same types who say that we should not regulate rape and murder because we do not know what those are either. We do know.

C. 1968 Ginsberg

14. Starting with *Ginsberg* (1968), the Federal Courts have already determined that statutes passed by the state legislatures that make retailers sell their pornographic materials behind a barrier/shield survive first amendment heightened scrutiny.²⁹ So, when a person walks into a 711, “girlie magazines” are found behind barrier shield. The retail clerks are key holders to the barrier/shields - not the parents or customers. The ISPs and Device Makers sell products that amount to extensions of their bricks and mortar retail store.³⁰ The ISPs is part of the distribution supply chain of obscene material and infringed copyrighted works. The devices are effectively portable handheld store. The ISP router is like a mini-store itself. Therefore, under existing shield laws that are already in place in all 50 states, Device Makers and ISPs have remained

²⁹ Over 179 cases have cited this statement in *Ginsberg*: "Statute making it illegal to sell obscene material harmful to minors, to youths under 17 years of age, did not invade the area of freedom of expression constitutionally secured to minors in view of fact that it was constitutionally permissible for state to so accord minors under 17 a more restricted right than that assured to adults to judge and determine for themselves what sex material they might read or see. Penal Law N.Y.1909 § 484-h *Ginsberg*, 390 U.S. 629, 88 S. Ct. 1274, at 1275.

³⁰ To "simply adjusts the definition of obscenity to social realities" has always failed to be persuasive before the Courts of the United States. *Ginsberg.*, 390 U.S. 629 at 1280;; *Mishkin v. State of New York*, 383 U.S. 502, 509, 86 S.Ct. 958, 16 L.Ed.2d 56;; *Bookcase, Inc. v. Broderick*, supra, 18 N.Y.2d, at 75, 271 N.Y.S.2d, at 951, 218 N.E.2d, at 671.

obligated to sell their products with barrier/shield/filters that block pornography.³¹ The Device Makers and ISPs, like the 711 clerk, are required to be the key holder of the shield.³² They are required to check for proof of ID before they remove the shield/filter for customers.³³ Its not the job of the customer - whether parent or minor - to play key holder. Therefore, every time the ISP

³¹ Ariz. Rev. Stat. Ann. ss 13-3501 to-3507 (Supp. 1986); Colo. Rev. Stat. ss 18-7-501,-502 (Supp. 1984) (held unconstitutional); Fla. Stat. Ann. ss 847.0125, .013 (West 1994); Ga. Code Ann. ss 16-12-102,-103 (1992) (held unconstitutional); Ind. Code Ann. s 35-49-3-3 (West 1986); Me. Rev. Stat. Ann. tit. 17, ss 2911, 2912 (West 1983 & Supp. 1995); Miss. Code Ann. s 97-5-27 (1994); Mo. Ann. Stat. ss 573.010, .060 (Vernon 1995); Mont. Code Ann. s 45-8-201 (1995); N.C. Gen. Stat. s 14-190.14 (1986); N.D. Cent. Code s 12.1-27.1-03.1 (1995); 18 Pa. Cons. Stat. Ann. s 5903 (1983 & Supp. 1995); R.I. Gen. Laws s 11-31-10 (Supp. 1986); S.C. Code Ann. ss 16-15-260,-290,-390 (Law. Co-op. 1985); S.D. Codified Laws Ann. ss 22-24-27,-29.1 (1979 & Supp. 1995); Tenn. Code Ann. s 39-17-914 (1991); Utah Code Ann. ss 76-10-1227,-1228 (1995); Vt. Stat. Ann. tit. 13, s 2804b (Supp. 1995). Marion D. Hefner, *"Roast Pigs" and Miller-Light: Variable Obscenity in the Nineties*, 1996 U. Ill. L. Rev. 843, 882 (1996). Ga Code Ann S 16-12-102(1) (Michie 1992). See also Ala Stat SS 13A-12-200.1(3), 13A-12-200.5 (1994) (probably prohibiting only display for sale); Ariz Rev Stat Ann S 13-3507 (West 1989) (prohibiting any display in any "place where minors are invited as part of the general public"); Fla Stat Ann S 847.0125 (West 1994) (prohibiting only display for sale); Ind Code Ann S 35-49-3-3(2) (West 1995) (prohibiting any display "in an area to which minors have visual, auditory, or physical access"); Kan Stat Ann S 21-4301c(a)(1) (1988) (prohibiting display in commercial establishments only); La Rev Stat Ann S 14:91.11 (West 1995) (prohibiting any display "at a newsstand or any other commercial establishment which is open to persons under the age of seventeen years"); Minn Stat Ann S 617.293, subd 2(a) (West 1987 & Supp 1996) (prohibiting commercial display); NM Stat Ann S 30-37-2.1 (1978 & Supp 1995) (prohibiting display only while offering for sale, "in a retail establishment open to the general public," and "in such a way that it is on open display to, or within the convenient reach of, minors who may frequent the retail establishment"); NC Gen Stat S 14-190.14(a) (1993) (prohibiting display in commercial establishments only); Okla Stat Ann SS 1040.75, 1040.76 (West 1983 & Supp 1996) (prohibiting all display, "including but not limited to . . . commercial establishment(s)"); Tenn Code Ann S 39-17-914(a) (1991) (prohibiting display for sale or rent); Tex Penal Code Ann S 43.24 (Vernon 1991) (prohibiting all display, whenever person is "reckless about whether a minor is present who will be offended or alarmed by the display"); 13 Vt Stat Ann SS 2801(8), 2804a (Equity 1971 & Supp 1995) (prohibiting display "for advertising purposes"). Eugene Volokh, *Freedom of Speech in Cyberspace from the Listener's Perspective: Private Speech Restrictions, Libel, State Action, Harassment, and Sex*, 1996 U. Chi. Legal F. 377, 436 (1996)

³² At the time of *Ginsberg*, nearly every State had a prohibition on the sale to minors of "harmful-to-minors" material. 390 U.S. at 647-648. Those state laws, or slight modifications of them, remain in effect today. Many States have found, however, that a sale prohibition is insufficient to vindicate their interest in shielding minors from the harmful effects of pornographic materials, such as the pornographic photographs that appear in *Hustler*, *Penthouse*, and *Playboy*. When such magazines are placed in a public area of a store, minors may be able to gain access to them without having to purchase them. Many States have therefore established a prohibition on the public display of material that is harmful to minors. Such laws effectively require "harmful-to- minors" material to be placed behind a blinder rack, in a sealed wrapper, in an opaque cover, in a separate room, or behind the counter.

³³ The harmful-to- minors statute at issue in *Ginsberg* covered "any description or representation, in whatever form, of nudity, sexual conduct, sexual excitement, or sadomasochistic abuse when it": (i) predominantly appeals to the prurient, shameful or morbid interest of minors, and (ii) is patently offensive to prevailing standards in the adult community as a whole with respect to what is suitable material for minors, and (iii) is utterly without redeeming social importance for minors. *Id.* at 646. The Court described the New York statute as covering "'girlie' picture magazines" that are not ob- scene by adult standards, but are obscene with respect to minors. *Id.* at 634.

and Device Makers sell one of their products without a filter shield they are molesting current obscenity laws and deserved to be prosecuted for criminal violations.³⁴ In nearly every child porn case since the explosion of the web in the 1990s, Device Makers and ISPs have played a culpable role in victimization. Their hands are not clean. I am not seeking a new right or a new law. I am seeking enforcement of existing shield laws by the issuance of an injunction against the Defendants and their co-conspirators. The unexamined assumption of the superiority of our culture moment in the area of sexuality continues to demonstrate the arrogance of mankind and the dire need for ISP filters.

D. *Miller* (1973)

The Supreme Court in *Miller* (1973), already found that obscenity is not protected speech for purposes of the first amendment. *Miller v. California*, 413 U.S. 15, 30-34 (1973). The Miller Court extensively defined pornography as to our existing state and federal obscenity statute, so the defense of “one man’s lyric is another man’s vulgarity fails.” *Cohen v. California*, 403 U.S. 15, 25 (1971). So that’s that. I mean seriously, lets be honest, “pornography,” like music and film, is not even “speech” - it is “stimuli.”³⁵ Not all speech is equal. For example, contrast Hillary Clinton’s bible the “rules for radicals” verse’s Senator Cruz’s Bible, the New Testament.

E. 1991 Secret Meeting Between Jobs and Gates

³⁴ The *Ginsberg* Court explained that “[t]he legislature could properly conclude” that parents who have “primary responsibility for children’s well-being are entitled to the support of laws designed to aid discharge of that responsibility,” *id.* at 639, “[t]he State also has an independent interest in the well-being of its youth,” *id.* at 640, and the legislature was entitled to regard the material covered by the statute as “impairing the ethical and moral development” of minors, *id.* at 641.

³⁵ My friends in the music business and filter industry need to intervene this action. <http://www.theverge.com/2014/12/12/7382287/project-goliath>

15. In 1991, the ISPs and Device Makers former the porn compact at a secret meeting between Steve Jobs and Bill Gates at Job's home in Palo Alto. This compact was further solidified and expanded at the annual conventions in Vegas where the Tech Companies and Pornography companies come together annually to give birth to this fraudulent scheme. The Device Makers and ISPs all decided not to allow one another to provide safety features so that none of them could be held accountable for violating obscenity laws. Next time, the Tech companies decide to engage in racketeering by crawling into bed with predatory pornographers at the expense of American consumers, they should be more discrete. Scheduling the worlds largest adult entertainment and technology conventions under the same roof was a bit of a dead giveaway of the marriage between these two industries.³⁶ The Tech companies will be relentlessly pursued in multiple jurisdictions for good cause until justice is served.

F. Mid 90s CDA

In the 90s, with the advent of the internet, pornography exploded. ISPs, Device Makers, and IPC took pornography that was otherwise below ground and made it above ground. Feeling pressure from consumers and the Tech companies, Congress responded by passing the Communications Decency Act (1996). The act was supposed to be a compromise between the public's interest and the tech companies but it was not. The CDA had Device Maker and ISP's pornographic fingerprints all over it. The CDA was designed to regulate consumers, not the Tech companies.

³⁶ Every year in January the single biggest porn show is in Las Vegas. It is on floor one and two. What is on floor three you might ask? The biggest electricity and technology show. It is the same industry. Time Warner, AT&T, Windstream, and all other ISPs are present. For the past two decades, the annual Consumer Electronics Show in Vegas overlaps with the Adult Entertainment Expo. These are the largest conventions in these industry. I attended SXSW music conference every year, and music and the film conference overlap for the same reasons that the porn and technology conferences do. The overlap is by no means a coincidence. The common enterprise knows that "sex sells," but this has been taken too far. These conventions used to meet under the same roof, now they overlap in the same convention center.

The statute was completely unfair in that regard, and amounted to “democracy for hire.” A parent could be put in jail if their child accessed pornography for heavens sake. The CDA was unrealistic and too harsh. The ACLU filed one of its infamous first amendment lawsuits and causes part of the CDA to be stricken.³⁷ *Reno v. ACLU*, 521 U.S. 844, 117 S.Ct. 2329, 138 L.Ed. 2d 874 (1997) (“*Reno I*”). Since then, the Tech companies have attempted to hide behind section 230 the CDA that was not challenged by the ACLU as part of a calculated move pursuant to its irrational belief system. The Communication Decency Act was passed to protect “decency,” not as a justification to encourage “indecentcy.” It is the gag of all time that this idea could be circulated.³⁸

G. 1999 COPA

16. In response to the failure of the CDA, Congress passed the “Child Online Protection Act.” (COPA). But the ACLU in keeping with a pattern of dishonest, responded by creating a information website for handicap people wanting to learn about sex, as another one of its litany of implausible ploys. The unvisited website may or may not have fallen under COPA regulation. The purpose of the site was to invent a basis for standing to challenge COPA under first amendment. The ACLU challenged the COPA before the Pennsylvania District Court. The

³⁷ Although there is no doubt that the ACLU is a highly religious organization that promotes the mindless religion of atheism and there is no doubt that they were full of bad faith in challenging the CDA, I do completely agree with them that it was unfair that the act attempted to regulate individuals. It should have been crafted to target the Device Makers and ISPs. But Congress at the time was paid off by special interest under the wall street Government mentality.

³⁸ For the public to be able to understand the effect of Section 230. Section 230 effectively prevents a member of the public from filing a lawsuit against an interactive service provider due to acts of a third party. So for example, here is how section 230 of the CDA works: if a Ms. Bittman posted a defamatory comment on youtube about Megan Fox. Mrs. Fox could not sue youtube, but she could sue Ms. Bitman. ISPs are often covered in such litigation, section 230 does not apply to protect against copyright right infringement, (which should cause the ears of Sony to perk up, since if it wants to salvage the music business, this case provides the answer), nor does the CDA protect the ISPs for violations for distributing child pornography and obscenity, which means that the defense is not going to work here. It is that ISPs have not been sued for distributing obscenity until now.

Pennsylvania District Court reluctantly struck down COPA, as it expressed tremendous concern for children in doing so. Yet, I agree that the ACLU was right in that case. Like with the CDA, COPA was crafted to regulate individual consumers and not the Tech companies, which was completely abusive. Importantly, before striking down COPA, the Honorable District Court of Pennsylvania repeatedly stated that legislation that mandated that ISPs and Device Makers sell their products with filters would survive first amendment heightened scrutiny. In sum, the Court said that my lawsuit is plausible. COPA case was appealed twice, and the United States Supreme Court said that although COPA was barely unconstitutional that Congress could pass filter legislation that would regulate the ISPs and Device Makers. A Congressional findings committee that was involved with the case supported the same conclusion. Because the Device Makers, ISPs, and certain websites have done such an outstanding job shaming consumers into believing in the “blame the parents game,” Congress’s hands have been completely tied to pass regulation to make filtering a reality. The media has a lot to do with that the proliferation of that false gospel. Pimps who groom children for sex trafficking, greezy divorce lawyers, and Backpage.com couldn’t be happier. Meanwhile, the Federal Courts of the United States and the consumers have been totally left out to dry, as if they are both pro-pornography when they are not. We have left children and young adults to have to navigate a porn filled landscape that is rife with enticements and traps. The Device Makers and ISPs are laughing their way to bank and pretending to be “anti-porn,” when they “above all others,” they are for it because they are benefiting the most. (see exhibits). It is time that they be held accountable for the injuries inflicted upon the United States and the Global community.

H. 2002 Ashcroft v. Free Speech Coalition

17. In *Ashcroft v. Free Speech Coalition*, 535 U.S. 234 (2002), things take a further turn for the worse. The United States Supreme Court said that it was lawful for adults who resembled minors to be featured in pornographic materials. While the Supreme Court likely made the right decision in *Ashcroft*, what has been terrible wrong is for the ISPs and the Device Makers not to provide consumers with the choice as to whether they want to be exposed to such harmful content that cultivates sexual preferences for children.³⁹ The states do offer a viciously dysfunctional criminal justice system and a domestic court system that is ready to tear to pieces any member of the community who is victimized by the lack of safety measures on ISPs and Devices. It is the CEOs of ISPs and Device Makers, domestic lawyers, and prosecutors, who themselves need to be prosecuted. Not whistle blowers like Dinesh D'souza, who sits in jail now, for attempting to promote the truth to the American public.

I. 2013 Apple

18. This is where yours truly steps into the timeline. I was personally injured by the joint enterprise between ISPs, Device Makers, and Pornographers who maliciously failed to provide safety filters that would have prevented my exposure to damaging pornography. Neither the ISPs nor the Device Makers provided warnings of any kind of the addictiveness and dangerousness of interacting with pornography. The Defendants knew that pornography was damaging and addicting but fraudulently concealed that information to myself and all other consumers. In fact, they falsely marketed their products as safe and family friendly, when they knew that they were not.

³⁹ Ms. Bittman and the ALA think that sex with children is a matter worth celebrating to such an extent that harassment lawsuits have been filed in District Court in Illinois where the ALA is headquartered against the honorable Megan Fox, Dan Klieman, and others. I will be intervening.

19. In June 2013, I filed a lawsuit against Apple. The case made international news and allowed for a public debate which enabled the Honorable British to push forward with the UK's filter initiative over ISPs.⁴⁰ Unlike President Obama, Prime Minister Cameron understand a concept we in the United States Military call "leadership."⁴¹ The original lawsuit amounted to a "love letter" to Apple, in which I was asking that the Device Maker "sua sponte" give me the relief I was demanding. However, Apple's Tim Cook, is a confused and sexually broken homosexual, who wants to distribute pornography at will to kids so that they will grow up sympathetic to the distorted gay conquest that is spearheaded by the ACLU through our Courts. Apple responded to the lawsuit in the same way that Backpage.com did when a team that I was part of asked that they discontinue their adult service section.⁴² Apple dug in tooth and nail to fight the litigation at all cost, regardless of the impact on the public's health and human trafficking. In fighting Apple, it was uncovered that all of the other Device Makers and ISPs have formed a joint enterprise that involves lobbying groups like Planned Parenthood, Divorce lawyers, strip clubs, predatory pornographers, who are part of a seamless continuum of immense evil. There is an existing nexus that advances a sleepless malice that is dead set on distorting the truth for personal

⁴⁰ See article in the UK social reader: "Last week, a man in the U.S. sued Apple for not including a default "safe mode" that prevented him from accessing porn. Chris Sevier said his Macbook led him to a serious porn addiction that resulted in depression and his family leaving him. While many initially mocked the case, the UK is now asking tech companies to do exactly what Sevier asked for, showing how serious lawmakers around the world are taking the issue of online pornography." <https://socialreader.com/me/content/XULox>

⁴¹ I wouldn't trust our present commander in Chief to be able to successfully tie his own shoe, but I do have faith in the redemptive quality of this Honorable Federal Court to provide me with an injunction to cure COPA.

⁴² I was volunteering with a former Special Ops and FBI group to combat sex trafficking. We called Backpage.com and pleaded that it drop the adult section of their website. Backpage.com refused, and confirmed that is made most of its money from the adult section

financial benefit, regardless of the cost of Governments and the welfare of billions of consumers.⁴³

J. 2014 Google

20. Accordingly, I filed a subsequent lawsuit against Microsoft, Google, Android, Samsung, Verizon, Dell, Planned Parenthood, Governor Haslam, and State Attorney General Cooper - (who resigned). Furthermore, in the midst of the Federal litigation, Apple's counsel unsurprisingly threw the ISPs for being a part of the enterprise. In the Military, we call those kinds of finger pointers "Blue Falcons." The device makers in these actions have attempted to hide behind section 230 of the CDA, but that strategy has failed completely because we are dealing with obscenity violations, which does not support preemption. Furthermore, even if the CDA applied as a defense - which it does not - the CDA does not cover the Federal fraud violations or racketeering claims. Therefore, the litigation against the Device Makers and ISPs here is completely valid, and motions to dismiss should be subjected to rule 11 sanctions.

K. Math Formula:

<https://soundcloud.com/ghostwars/the-battle-is-won>

21. There is a math formula at play in this case that is going to cause the Defendants to lose, I would like to end the suspense and share it upfront: *Ginsberg* (1968) + *Am. Civil Liberties Union* (1999) + *Ashcroft* (2004) = the Defendants will be enjoined to encourage consumer safety and consumer choice.⁴⁴ The *Ginsberg* court established that state statutes that requiring vendors

⁴³ Sex trafficking, pornography, strip clubs, homosexual marriage, child molestation, abortion clinics, slimey divorce lawyers are all part of the same part of a wicked seamless interconnected continuum. At the head of this snake are the manufacturers of devices that connect to the web. The best way to kill a snake is to cut its head off. The tech companies are the head of the snake, as a result of their racketeering initiatives.

⁴⁴ *Ginsberg v. New York*, 390 U.S. 629, 639–40, 88 S.Ct. 1274, 20 L.Ed.2d 195 (1968) and *Am. Civil Liberties Union v. Reno*, 31 F. Supp. 2d 473, 476 (E.D. Pa. 1999); also aff'd, 217 F.3d 162 (3d Cir. 2000) vacated sub nom. *Ashcroft v. Am. Civil Liberties Union*, 535 U.S. 564, 122 S. Ct. 1700, 152 L. Ed. 2d 771 (2002); *Ashcroft v. American Civil Liberties Union*, 542 U.S. 656 (2004)

to provide smut behind shields in their retail stores are Constitutionally sound.⁴⁵ The *Am Civil Liberties Union* court resolved that to require individual “self-censorship” is “itself an injury.” The court championed filters as a Constitutionally sound solution under the 1st Amendment to help cure the porn pandemic and placed the burden to provide filters on the device makers, not the customer. The Supreme Court in *Ashcroft* backed the filter solution that I champion here in the same way that Prime Minister does in the United Kingdom. The USSC effectively yelled at Congress to pass filter legislation, as it was forced to strike down COPA that was infected by the Device Maker’s and ISPs influence. Therefore, any more of this rhetoric from ISPs that my claims are implausible should be met with rule 11 sanction. Such false rhetoric should be seen for the same kind of bullying that caused them to be sued in the first place.

L. Solution

22. The Courts in Pennsylvania and Tennessee should issue an injunction that requires the device makers and ISPs to both sell their products with their own custom made pre-set filters that make a reasonable attempt to block pornography. We are not talking about perfection, we are talking about making ongoing efforts to block pornographic content under the “we know it when we see it standard.” If the purchaser is over 18 and wants to access ponrography, he should be required

⁴⁵ In High School, I really liked Math, thanks to an outstanding math teacher who pushed me to believe that getting a wrong answer was an act of laziness.. To me this case can be reduced to the following formula. *Ginsberg* (1968) + *Am. Civil Liberties Union* + *Ascroft* = the Defendants will be required to sell their products with filters by this Court. The Ginsberg Court established that statutes that require retailers to sell their products behind a preset shield do not offend the United States Constitution. Am Civil Liberties Union Court indicated that self-censorship by individuals is "its self an injury." In championing the filter system that I too advance, the Court seems to championing that it is the device makers to provide consumers with preset filters that automatically block porn and are pre-set. Its not the duty of the purchaser to seek out third party filtering solutions, when those companies lack insider knowledge to begin with. In striking down COPA, the United States Supreme Court established that filters on devices was the least restrictive means to blocking obscenity for purposes of surviving First Amendment Scrutiny. It is inferable from the case that the USSC was pressing Congress to pass filter legislation, but Congress hasn’t because of lobbying groups funded by the Defendants who provide massive campaign contributions and false information in order to allow them to continue to distribute highly addictive pornography without consequence.

to show proof of ID in person to the ISP and the retail stores. Perhaps the service man who provides the router box can check the ID so that the customer does not need to leave the house. The retailer can then issue a warning of the hazards of the pornography that is being distributed for those who opt out. That's what is happening in the UK and that is what must happen in the United States - or we are no longer the world leader in human rights. The Defendants will actually have clean hands in the transaction and for once can be free from fraud. Moreover, all of the criminal fallout and victimization that happens subsequently to that will rest on the individual perpetrator, who assumed the risk and made the choice to have access to pornography in the first place. (Pro-choice and Pro-life supports should all agree with me on this topic - we should have the freedom to be choose to be free from pornography). Intentionality should shift onto those who want to see porn to have to take the extra steps to do so. The idea that an individual consumer has to be burdened to take the extra steps to avoid pornography is outrageously unjust. We are punishing schools for making them filter and rewarding the proponents of human trafficking. Furthermore, the Government cannot legitimately pass laws that are harsh on sex related crimes, without first taking proactive steps to curb the unlawful distribution of obscene stimulus that inspired the criminal act to begin with. Currently, the state and federal Government are to some degree culpable for the lack of regulation in this area. The burden should not be imposed on those who do not want to be subjected to pornography whether they be for religious, scientific, or marital reasons. The Defendants and their co-conspirators must be forced to reimburse all of the purchasers of third party filters and their inventors.

L. [I'm Already Working On A Bill For Filter Legislation At The State Level In Alabama](https://www.youtube.com/watch?v=XAdex-qcvJM)
<https://www.youtube.com/watch?v=XAdex-qcvJM>

23. I've been in some interesting situations throughout life, but there is a current one that I must disclose that is relevant. I have been asked by the Alabama state legislature to immediately draft a Bill that will mandate filters for Device Makers and ISPs. The is another state who reached out to me this week wanting the same. If the purchaser is over 18 and wants the filter removed, it can be done by showing proof of ID to a retail clerk, who will remove the filter. This legislation is supported by the rationale in *Ginsberg + Am Civil Liberties Union + Aschcroft*. So, while I am asking the Federal Courts to enforce the law, I am literally writing the law in state legislature. I am asking the court to tell me the law while creating it on the state level.⁴⁶ That is quite a unique position to be placed in but one that the Court and the Defendants need to be aware of here. Once the bill is presented by the state representatives, all of the other southern states will pass something similar. So, it is my position that the writing is on the wall: (1) the American public wants this and (2) the enterprises continuous proliferation of a porn pandemic at the expense of consumer health is coming to an inevitable demise. Our Nation has been poisoned from the inside out due to the distortistic tactics of liberal atheistic radicals, who have no basis for defining right and wrong other than the fact that they believe something is right because they feel that it is. Such is the same mindset of a pedifile.

III. PRELIMINARY INJUNCTION FACTORS

The Heart Of The Matter Documentary <https://www.youtube.com/watch?v=G1GHeoBWg6I>

24. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. This section of the complaint is likely the

⁴⁶ This circumstance raises the question what is the law really? The answer is that the laws of the United States are transcultural and shaped off of Christianity. It is transcultural position to assert that the seller must provide the seat belt.

most important because it centers on a primary form of relief that I am requesting. It is my intent to keep this case very clean and simple - especially for the Court's sake. I am going to keep pornographic images out of this case, as courtesy to the Court and defense counsel. But the primary form of relief I seek for my personal recovery is an injunction. The 12th step of the classic 12 step program to recover from addiction is for the addict to help others avoid addiction. Accordingly, it would constitute immeasurable healing if the Court would hand down a preliminary injunction to make the ISPs and all other device makers sell their products that connect to the internet with pre-set filters.⁴⁷ I have lost my family as a result of the porn scamming enterprise at work here. But if I could rest my head at night knowing that my suffering caused other people to not have to suffer, I could find restoration in such thoughts. I make no apology in asking the Court to use my personal injury to inflict a crippling blow to sex trafficking demand.

25. Injunction Elements: In determining whether to grant a preliminary injunction, a court considers the following four factors: (1) whether the plaintiff is likely to succeed on the merits,⁴⁸ (2) whether the plaintiff is likely to suffer irreparable injury absent an injunction,⁴⁹ (3) whether

⁴⁷ Pornography is the nicotine ingredient of the device makers product. This is why the device makers are defending their right to distribute it so zealously, even if doing so is completely inconsistent with the falsified family friendly marketing scams. Pornography is destroying sex. Causing arousal addiction and erectile dysfunction in males of all ages. Pornography has created a destructive public health crisis.

⁴⁸ Pornography is part of a nefarious inter continuum that includes sex trafficking, strip clubs, human trafficking, abortion, and LGBT. Pornography is a 95 billion dollar industry that earns more than the NFL, NBA, and Major League Baseball combined. The United States is responsible for approximately 13 billion of that number. 3 Billion associates with child pornography.

⁴⁹ Although it is illegal to distribute pornography to minors, many people in jail for sexual related crimes began looking at pornography before they were 18, thanks to the greed of device makers. The device makers simply do not think that they are subject to the law, and the executive branches lack of enforcement of unambiguous obscenity laws has supported the device makers false believe. The developing brains of testosterone saturated young adult males, like myself, and teenagers are especially susceptible to the perilous injuries of pornography.

the balance of equities tips in the plaintiff's favor,⁵⁰ and (4) whether the public interest would be served by granting the injunction.⁵¹ All of these factors inescapably resolve in my favor entirely. If there was ever a case involving bad forms of sex where an injunction should issue to preserve human rights, it is this case.

26. Statistics: Lets consider some statistics before considering the injunction. First, Porn sites get more visitors each month than Netflix, Amazon And Twitter Combined.⁵² Second, 30% of the Internet industry is pornography; The online porn industry makes over \$3,000 per second.⁵³

⁵⁰ There are literally hundreds of treatment facilities in the United States with waiting list to receive treatment for porn addiction. Anti-human trafficking groups are sprouting up everywhere to combat the growing demand for sex trafficking and child prostitution. Adult sections of prostitution hubs, like backpage.com, is making prostitution explode in all major cities in response to the growing demand thanks to easily accessible pornography. Updated FBI reports conclusively show that following the prospect of the legalization of marijuana, more cartels are shifting into the sex slavery industry in light of the demand. Show studies show that approximately half of the marriages that end in divorce reference pornography being involved in some degree.

⁵¹ Generally, in determining whether to grant a preliminary injunction or a temporary restraining order, courts in this Circuit review four factors: (1) the likelihood that the applicant will prevail on the merits at the final hearing; (2) the extent to which the plaintiffs are being irreparably harmed by the conduct complained of; (3) the extent to which the defendants will suffer irreparable harm if the preliminary injunction is issued; and (4) the public interest. *Shire US, Inc. v. Barr Labs. Inc.*, 329 F.3d 348, 352 (3d Cir. 2003) (citations omitted). “[W]hile the burden rests upon the moving party to make [the first] two requisite showings, the district court ‘should take into account, when they are relevant, (3) the possibility of harm to other interested persons from the grant or denial of the injunction, and (4) the public interest.’” *Acierno v. New Castle County*, 40 F.3d 645, 653 (3d Cir. 1994) (citation omitted); see also *Adams v. Freedom Forge Corp.*, 204 F.3d 475, 484 (3d Cir. Pa. 2000) (noting that “[i]f relevant, the court should also examine the likelihood of irreparable harm to the nonmoving party and whether the injunction serves the public interest.”) All four factors should favor relief before an injunction will be issued. *S & R Corp. v. Jiffy Lube Int’l. Inc.*, 968 F.2d 371, 374, (3d Cir. 1992)(citing *Hoxworth v. Blinder, Robinson & Co.*, 903 F.2d 186, 192 (3d Cir. 1990))

⁵² http://www.huffingtonpost.com/2013/05/03/internet-porn-stats_n_3187682.html (accessed June 6, 2014).

⁵³ Stephen Yagielowicz, “The Internet Really is Porn,” <http://www.xbiz.com/news/146703> (accessed 6/11/14). “Anthony compiled data from Google’s DoubleClick Ad Planner to reveal that XVideos is currently the largest adult website, boasting 4.4 billion page views per month; with other adult sites, such as LiveJasmin, YouPorn, Tube8 and Pornhub all commanding vast expanses of market share, ‘that dwarf almost everything except the Googles and Facebooks of the Internet.’” “. . . that sets adult sites apart from non-adult sites; with Anthony comparing a 15–20 minute average porn site visit to a three–to–six minute visit on a news site as evidence of adult’s stickiness. . . . Anthony states that ‘while the amounts vary, typical adult websites contain 50 to 200 terabytes of porn and are responsible for nearly a third of all Internet traffic.’” “Anthony stated, ‘It’s probably not unrealistic to say that porn makes up 30 percent of the total data transferred across the Internet.’” See Sebastin Anthony, “Just how big are porn sites?” *Extreme Tech* (Apr. 4 2012), <http://www.extremetech.com/computing/123929-just-how-big-are-porn-sites>.

Third, Mobile porn is expected to reach \$2.8 billion by 2015.⁵⁴ Forth, The United States is the largest producer and exporter of hard core pornographic DVDs and web material.⁵⁵ The House and Senate are aware that this is matter cannot be passed off as an overseas issues. Fifth, Google Trends analysis indicates that searches for “Teen Porn” have more than tripled between 2005–2013. Total searches for teen–related porn reached an estimated 500,000 daily in March 2013 — one–third of total daily searches for pornographic web sites.⁵⁶ Sixth, Of the 304 scenes analyzed, 88.2% contained physical aggression, principally spanking, gagging, and slapping, while 48.7% of scenes contained verbal aggression, primarily name–calling. Perpetrators of aggression were usually male, whereas targets of aggression were overwhelmingly female.⁵⁷ A Google search for ‘bestiality’ generated 2.7 million returns. Google (accessed April 28, 2014). As Americans, how can we sit back and allow this to continue, when we have the power to change this trend and reduce the suffering?

A.

PUBLIC’S INTEREST

<https://www.youtube.com/watch?v=RfxSalJ2y5g>

⁵⁴ Juniper Research, “Videochat and subscription services to drive mobile adult revenues to \$2.8bn by 2015, Juniper Report finds,” Oct. 14, 2010. <http://www.juniperresearch.com/viewpressrelease.php?pr=210> (accessed December 27, 2012).

⁵⁵ http://familysafemedia.com/pornography_statistics.html#important_countries (accessed June 6, 2014). Pornographic web pages by country are U. S. 244,661,900 (89%) and Germany 10,030,200 (4%)

⁵⁶ Gail Dines, “A rare defeat for corporate lobbyists,” (August 1, 2013), <http://www.counterpunch.org/2013/08/01/a-rare-defeat-for-corporate-lobbyists/> (accessed June 6, 2014). Dr. Dines also analyzed the content of the three most popular “porntubes,” the portals that serve as gateways to online porn, and found that they contained 18 million teen–related pages—again, the largest single genre and about one–third of the total content.

⁵⁷ Ana Bridges, et al., “Violence Against Women,” *Sage* 16, no. 10 (October 2010): 1065–1085. This current study analyzes the content of popular pornographic videos with the objectives of updating depictions of aggression, degradation, and sexual practices and comparing the study’s results to previous content analysis studies. Findings indicate high levels of aggression in pornography in both verbal and physical forms.

27. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. An injunction should issue because the public interest resolves in my favor to such an extent that CEOs of the companies named here should go to prison. There are several major sectors of society that need the injunction imposed.

(1) **THE MILITARY NEEDS THE INJUNCTION**

28. I am a former Army Officer, who went to combat basic training in response to 911, who attended Officer Candidate School, and Officer Basic Course at TJAGLCS in Virginia. Although I remain a First Lieutenant, I served in Operation Iraqi Freedom in an O6, Colonel's slot and worked with the U.S. Attorney's office on the Rule of law mission through 3rd ID. So it should be of no surprise that in May 2014, I was inside the Pentagon to meet with officials regarding my litigation in the Apple case. In the United States Military sexual assault is a major problem that is growing.⁵⁸ There is no question that sexual assault is being encouraged and inspired by accessible pornography that the Defendants' distribute on their filterless devices and by the false shame based rhetoric spewed forth by the immoral same-sex advocacy groups. The United States Military prides itself on having Soldiers who are held to higher disciplinary standards than members of the civilian sector. Officials at the Pentagon told me directly that they "need me to win this case." They did not stutter. I need the Court to appreciate the significance of that contention, regardless of how impressed the ISPs are with their brand name and fraud scheme. We are dealing with the safety of Soldiers here who protect the very freedom interest that the Defendants openly abuse. If this Court were to hand down an injunction against the device

⁵⁸ Instances of sexual assault amongst members of the same sex has become out of control, thanks to the President's repeal of "don't ask, don't tell," which has completely demoralized our troops, and caused a mass exodus from within our ranks of Soldiers who being strongly in morality and Christian faith.

makers, then the different branches of the Armed Forces would be able to promulgate regulations to require that all Soldier's to have preset filters activated on their laptops and cell phones, even if the purchaser was over 18. The evidence shows that this would (1) encourage good order and discipline, (2) decrease distractions, (3) boost morale, (4) cut back on UCMJ actions, (5) improve safety, and (6) make our Armed Forces Stronger. To oppose my request would be service discrediting misconduct and amount to a quasi-act of treason. The Nation and the world's freedom interest would be greatly advanced by encouraging the enablement of a more honorable and moralistic Military, which would be accomplish by issuing an injunction. Accordingly, the public's interest is advanced by the issuance of the injunction from benefit of the Armed Forces and National Security interest.⁵⁹ Make no mistake that I am in contact with the Joint Chiefs of staff on this matter. I am pushing Colonel Stice and Colonel Cofey to have TJAG provide authorization to permit me to collect testimonials from Fort Hood, Fort Bragg, and Fort Campbell so that the Court can understand what the pornography that the ISPs distribute at will is doing to weaken our National Defense.

(2) **CHILDREN, TEENAGERS, YOUNG ADULTS OF THE CURRENT GENERATION AND FUTURE GENERATIONS NEED THE INJUNCTION**

"As for whoever causes these little ones who believe in me to trip and fall into sin, it would be better for them to have a huge stone hung around their necks and be drowned in the bottom of the lake. Matthew 18:5

Fight The New Dr. Pat Love on Adolescents & PornographyDrug <https://www.youtube.com/watch?v=L7hJvWKwfOc>

⁵⁹ Sexual assault is an escalating problem in the military. To combat this, the implementation of a filtering system would allow commanders and Judge Advocates to require their Soldiers to maintain filtering programs on their personal laptops and computers that are brought onto military installations. This would hold Soldiers to higher disciplinary standards and provide them with a source of pride and dignity that makes them stand out from the civilian world. Additionally, the filter program would help for security reasons. Many Soldiers use their personal laptops and cell phones for military purposes. While the military has heighten secure networks like NIPER and SIPER, personal cell phones and lap tops are not secure, and yet they are used for paramount operational practices, which will escalate into a problem if cyber terrorism grows. Since pornography is married to corruption and organized crime the implementation of the filtering program could better safeguard against information leaks and security breaches in the preservation of National Security interest. Given the military connection that this litigation has, I will seek an immediate injunction to make the military stronger.

29. Every child deserves a protected age of innocence and the opportunity to thrive during childhood. Their hearts and minds are innocent, tender, and trusting and need to be safeguarded from the negative influences of increasingly violent and sexualized media. Unfortunately, online pornography damages children, and the consequences are mostly irreversible. Pornography is deforming the sexual development of young viewers and is used to exploit children and adolescents. As Dr. Cordelia Anderson will attest, “we have gone from Dr. Seuss to porn.”⁶⁰

31. Lets consider some statistics surrounding pornography and minors. First, among youth 12–years to 14–years, 88% in the United States used the Internet.⁶¹ Second, 37% of 3 and 4 year olds use their parent’s tablets and smartphones as do 87% of 5 to 7 year olds.⁶² Third, the mean age of first exposure to Internet pornography is 14.8 (girls) and 14.3 (boys).⁶³ Forth, 93.2% of boys and 62.1% of girls have seen online pornography before age 18. Sixth, “Boys aren’t the only ones affected by our porn culture. Girls, who make up a portion of the 12–to–17 year olds that

⁶⁰ Pornographers are the sex educators of our children. As a result of the Defendants porn compact, children have gone from “Dr. Seuss” to “porn.” We hand our children over to the media and the pornographers as the sex educators. They know it. Everyone is worse off as a result. We can no longer allow this. We have to fix a breakdown in Democracy and justice in this case. The fact that the ISP and Device Makers are selling filterless devices mean that the mobile devices are not rendered impossible for parents to monitor their kids.

⁶¹ “2008 World Internet Project survey of 13 countries revealed that among youth 12–years to 14–years, 88% in the United States used the Internet,” http://www.cdmc.ucla.edu/KS_Media_biblio_files/Guan%20%26%20Subrahmanyam%202009.pdf (accessed June 6, 2014).

⁶² http://www.familysafemedia.com/pornography_statistics.html (accessed June 6, 2014).

⁶³ Chiara Sabina, Janis Wolak, and David Finkelhor, “The Nature and Dynamics of Internet Pornography Exposure for Youth,” *CyberPsychology & Behavior* 11, no. 6 (December 2008): 691-693. “The current study used an online survey to question a convenience sample of college students about experiences with online pornography before age 18. . . . Overall, 72.8% of participants. . . . Most exposure began when youth were ages 14-17, and boys were significantly more likely to view online pornography more often and to view more types of images. . . . Girls were significantly more likely than boys . . . to report never looking for pornography on purpose. . . .” <http://online.liebertpub.com/doi/pdfplus/10.1089/cpb.2007.0179> (accessed June 6, 2014).

comprise the porn industry's largest consumer base, have internalized these messages too.⁶⁴

Seventh, 53% of boys and 28% of girls (ages 12–15) use sexually explicit pornography, most often via the devices sold by the Defendants and their co-conspirators.⁶⁵ Eighth, At least 44,000 primary school children and 473,000 children between ages of 6 and 17 accessed an adult website, mostly offshore, in the month of December 2013 from a computer.⁶⁶

30. Pornographers understand that the sexually exploitive pornography they produce and distribute is highly addictive. Like Tobacco Companies, they know that if they can get children hooked at a young age when their hormones are raging and their brains and bodies are underdeveloped, they will likely have a consumer for life unless the addiction cycle is broken.

31. The research could not be anymore clearer that children are suffering immeasurably because of the circumstance selfish technology companies have mercilessly put them in. Children are walking around with x-rated theaters in their pockets in the form of an iphone. The thousand testimonials provided by Fight The New Drug in this case could not be any clearer that children

⁶⁴ R. Henes, "Internet porn is ruining your relationship," *NY Daily News*, January 2, 2011.

⁶⁵ J. Brown and K. L'Engle, "X-Rated: Sexual attitudes and behaviors associated with U.S. early adolescents' exposure to sexually explicit media," *Communications Research* 35, no. 1 (February 2009):129–151. See also <http://www.unc.edu/depts/jomc/teenmedia/pdf/xrated.pdf>.

⁶⁶ <http://www.atvod.co.uk/news-consultations/news-consultationsnews/Atvod-publishes-research-showing-scale-of-underage-access-to-adult-websites> (accessed June 6, 2014). The AVTOD (Association for Television on Demand) research tracked the actions of youth using the internet from a desktop or laptop in December 2013. The research did not track youth accessing Internet pornography from smart phones. Most of the major offshore adult services are unregulated and allow free, unrestricted access to hardcore porno to visitors of any age, including children. This includes 23 of the 25 adult websites most commonly accessed from the UK.

are crying out for help and don't know where to turn or what to do.⁶⁷ It is sicking and outrageous that Device Makers are allowed to carry on business of as usual and fanny about with "freedom" arguments through vile lobbying groups.⁶⁸ The Defendants and their co-conspirators are targeting teens and enslaving them to perverse sexual lifestyles that is oppositional to individual and collective human flourishing. Pornography, like alcohol, does not discriminate on the basis of age when it comes to damaging the brain and reproductive system. Geriatric porn addiction is on the rise, like never before seen, given the easy access. However, the impact pornography has on the developing adolescent brain is worst of all. Accordingly, for the sake of future generations and in order to help prevent the creation of more testimonials like those provided by Fight The New Drug, the Court must issue the injunction for the sake of children, if not my own. There is nothing "adult" about pornograph, when device makers are enabling predatory pornographers to target children.⁶⁹ Pornographers giving out free samples is like a

⁶⁷ Trolling: The Defendants and predatory pornographers stalk testosterone-saturated teenagers and younger adult males, like myself. Pornographers and the Defendants know that if they can expose their images to as many as possible, eventually they will catch someone's interest. Like trolling for fish, they know if they just keep putting out their lure, their particular brand of porn will trigger in certain viewers a specific fetish or fancy. The Defendants intentionally failed to warn us about these hooks because it benefits them to promote the falsities about porn in conjunction with the warped gospel of Planned Parenthood and the homosexuals. As Patrick Carnes says, "that which is most private is most public." Porn addiction does not stay behind closed doors. It spills out into pop culture and commercials, giving us Lady Gaga's "Monster," who we should agree to oppose for our collective best interest and not just because its bad because we say its bad. The distribution of pornography converts its victims into stimulation addicts, deviant thrill seekers, voyeurists with sexual compulsive syndrome, who are led by their glands and are hateful. (Most people I know who live in the self/adult-centric reality are hateful and led by their glands - they do not make me want to be like them). You should see the death threats I collect. . Curiosity turns to arousal, then to lust, and before we realize what has happened, we are sucked into addiction and sexual conduct that beings to condition us adversely, which makes maintaining relationships down the road more difficult.

⁶⁸ Life is like a relay race. And the current generation has a duty to set the next generation up for success and prosperity. The weight of the domestic law in all 50 states says as much. It was vital that we abolish slavery to protect the current and subsequent generations of slaves from vicious cruelty and oppression (even if we sustained an inconvenience to the current economic systems). The porn litigation boils down to the the interest of children. It is a glorified domestic case, where the interest of children must be put first.

⁶⁹ While the same-sex marriage proponents saying that "love kills love" is too circular to be true, "porn kills love" championed by the Fight The New Drug is empirically correct.

tobacco employee handing out free cigarettes on a school play ground.⁷⁰ Just like in the case of Tobacco, the youth could rally to take down the Tech companies. Fight the New Drug is making fighting porn “cool.” To which, I say to the Defendants “tick tock.”⁷¹

⁷⁰ The free samples that the pornographers provide amounts to someone knocking on your door and saying, “excuse me is there a child here, I would like to give them a pack of cigarettes.” I would not be allowed to do that. Will someone explain to me, why are they the only company that gets to do that are the members of this enterprise? This is a system that is unregulated and deregulated that must be shut down by this Court or the rule of law is not governing, and we as a nation are in trouble.

⁷¹ Here is song my production team made to support them. Because they are worth supporting and are inspiring, unlike the tech companies who have no interest in humanity. <https://www.youtube.com/watch?v=m-FCjBzWw34>

32. Additionally, pornography is not just a male problem. Teenage Girls are struggling with pornography addiction at record rates.⁷² The best way to summarize this matter in a no nonsense manner could be: if the Courts want to continue to see children watching pornography and acting out some neighbor's daughter, then by all means deny the injunction. Such a scenario just played out in August 2014 in the the UK before a criminal Court, where a 15 year old boy watched porn and then acted out on his 10 year old neighbor. The court in that case was crying out for

⁷² Pornography warps our morals and erodes our ability to resist temptation, infringing on our consent, allowing us to be hustled, making it harder for the prior exposed not to visit porn that is just one click away. All it takes is a single exposure. The Enterprise knows that. The pornography that the Defendants support and distribute installs destructive permission giving beliefs. Here are some of the other lies that the Defendants are perpetrating onto society which erodes personal and collective freedom: (1) "I'll never get free of sex addiction" (2) "Pornography helps my marriage sex life" (3) "I can't live without my porn" (4) "God made me this way" (5) "God won't accept me because I keep falling to temptation" (6) "All sex is good" (7) "Forbidden sex is more enjoyable" (8) "If it feels right it must be ok" (see child molestation and homosexual conduct) (9) "The Bible teaches that sex is dirty" (10) "Pornography doesn't hurt anyone" (11) "Martial Sex is boring" (12) "Have as many partners as possible before you get married and trapped" (13) "Porn will teach you how to have great sex"(14) "Getting married will stop my pornography addiction" (15) "Strangulation during sex is normal and healthy" (16) "Lust is the same as love" (17) "There is nothing wrong with cultivating and acting upon lust" (18) "Masturbation is harmless and healthy" (19) "God is unfair and unloving to restrict sex to marriage." (20) Abstinence is unhealthy and unrealistic" (21) "Lots of sex with different partners brings satisfaction and fulfillment" (22) "I want regret putting pornographic images on the web" (23) "its cool to make porn" (24) "my past sexual history will not manifest problems in my marriage" (25) "having sex with different people does not impact my ability to bond" (26) "there is no such thing as porn addiction" (27) "there is no such thing as shame addiction" (28) "Pre-marital sex is ok as long as you're planning to marry the person" (29) "Sex is Ok as long as you are committed to one another in a monogamous relationship." (30) "Eric Holder is free from checks and balances" (31) "watching porn does not hurt anyone" (32) "God doesn't care about what I do with my body" (33) "I've committed the unforgivable sin" (34) "Your body is not good enough to be sexually successful" (35) "I cannot be loved unless I can compete with porn stars, I think I'll buy sex stimulants that I saw on the late night infomercial" (36) "I cannot be loved unless I can compete with the girl in the porn video: I think I'll get lip implants, breast implants, and a nose job" (37) "the actresses in porn are having fun and want to be there - they are clearly not faking it" (37) "porn has no connection to prostitution and sex-trafficking that is something that Chris Sevier single handedly invented to promote his EDM band and to become a famous fashion model in GQ and Esquire Magazine" (38) "Google, Samsung, Apple, Dell, Verizon are against pornography and are family friendly" (39) "this situation is hopeless" (40) "there is no withdraw from porn" (41) "love is love; and porn does not kill love;" (42) "Planned parenthood's sex education program is helping society and is not a form of religious doctrine itself;" (42) "keeping Christianity out of the schools - including prayer - has really been a smart move that has made us so much happier." All of these things are patently false and outrageous and are all part of the adult centric reality that has no place in the United State's laws and policies. We need to oppose the doctrine of lies to defend liberty. We have a duty to humankind to untwist the lies that are not setting us free, they are eroding freedom and putting us into darkness and bondage. There is no freedom in the absence of truth. Our policies must be reshaped by the Courts, executive, and legislature to enable us to return to the values that are in tune with the master narrative of the founding father's, which is a euphemism for Christianity.

something to be done on the legislative end of things to prevent such occurrences.⁷³ This case represents that “something” and this Court must “do” it. It is in the public's best interest that an injunction issue for the sake of children for generations to come.

(3) THE VICTIMS OF HUMAN TRAFFICKING NEED THE INJUNCTION

Learn to do good; Seek justice, Reprove the ruthless, Defend the orphan, Plead for the widow. Isaiah 1:17

Fight The New Drug Sex Trafficked Woman Reveals The Dark Reality of Porn

<https://www.youtube.com/watch?v=Wv4xVourQ9g>

33. Females are living in a perpetrating cultures that the Defendants and their co-conspirators have cultivated. Girls are being forced into an early ratification of sexuality that is not of their own making by the Defendants and their co-conspirators that is supported by an entire mass media. We have a “Female flesh loathing culture,” who understands humanity and exploits it selfishly. The average woman is left to live a life of invisibility. What does it mean to be visible in a hyper sexualized culture? As a female or male you have to become sexualized to look and act like a porn star or fashion model. Shelley Lubben and Jan Villarubia, two former Porn Stars from the Pink Cross Foundation have attested in these cases that no woman is designed for pornography type lifestyle. After escaping pornography, they spend their lives trying to rescue girls so that they can avoid the suffering that they experienced.

⁷³See Olsen, “Natural Rewards, Neuroplasticity, and Non-Drug Additions”; Hilton, “Pornography addiction—a supernatural stimulus considered in the context of neuroplasticity”; John A. Hunter, Aurelio Jose Figueredo, Neil M. Malamuth, “Developmental pathways into social and sexual deviance,” in *Journal of Family Violence*, 25 (September 2009): 141–148. See also a 2010 study conducted by the Internet Solutions for Kids and funded by the Centers for Disease Control Prevention, which finds viewing violent x-rated material may contribute to sexually aggressive behavior among 10–17 year olds. <http://is4k.com/press-releases/violent-pornography-linked-to-sexually-aggressive-behavior-in-children-and-adolescents/>

34. No one can deny that the pornography that the Defendants and their co-conspirators distribute have been the primary factor in ramped up the demand side of human trafficking.⁷⁴ (See the Declaration provided by M.A.T.H). The Defendants are more guilty than the individual content creators because they provided the platform to unleash this horror in the first place. Therefore, this is true: impose the injunction = impact a blow to human trafficking and compliance with the 13th amendment, since human trafficking.⁷⁵ Pornography is doing the grooming for human traffickers.⁷⁶ Abundant pornography is giving the false impression that

⁷⁴ 11 facts about human trafficking: 1. Globally, the average cost of a slave is \$90.2. Trafficking primarily involves exploitation which comes in many forms, including: forcing victims into prostitution, subjecting victims to slavery or involuntary servitude and compelling victims to commit sex acts for the purpose of creating pornography.³ According to some estimates, approximately 80% of trafficking involves sexual exploitation, and 19% involves labor exploitation.⁴ There are approximately 20 to 30 million slaves in the world today.⁵ According to the U.S. State Department, 600,000 to 800,000 people are trafficked across international borders every year. More than 70% are female and half are children.⁶ The average age a teen enters the sex trade in the U.S. is 12 to 14-year-old. Many victims are runaway girls who were sexually abused as children.⁷ California harbors 3 of the FBI's 13 highest child sex trafficking areas on the nation: Los Angeles, San Francisco and San Diego.⁸ The National Human Trafficking Hotline receives more calls from Texas than any other state in the US. 15% of those calls are from the Dallas-Fort Worth area.⁹ Between 14,500 and 17,500 people are trafficked into the U.S. each year.¹⁰ Human trafficking is the third largest international crime industry (behind illegal drugs and arms trafficking). It reportedly generates a profit of \$32 billion every year. Of that number, \$15.5 billion is made in industrialized countries.¹¹ The International Labour Organization estimates that women and girls represent the largest share of forced labor victims with 11.4 million trafficked victims (55%) compared to 9.5 million (45%) men.

⁷⁵ The sad reality is that Internet pornography, particularly that of an extreme, deviant and violent nature, fuels the demand for sex slaves. Dr. Richard Land, President of Southern Evangelical Seminary and former President of the Southern Baptist Convention's Ethics & Religious Liberty Commission, told this author that unquestionably, "I believe that Satan has discovered that the most powerful weapon he has to destroy individuals, families, and American society is hard core internet pornography. Hard core pornography is the propaganda and advertising campaign that generates epidemics of sexual exploitation of women and children and creates an ever increasing demand that is fulfilled through sex traffic."

⁷⁶ Laura J. Lederer, "Sex trafficking and illegal pornography—Is there a link?" (Pornography Harms: Capitol Hill Briefing, June 5, 2010). See <https://www.pornharms.com>. 1. Some types of pornography actually are sex trafficking. . . . Pornography industry insiders note that the production of pornography often matches the very definition of "severe forms of trafficking,"—force, fraud or coercion are used to prompt the performance of those featured in pornography. . . . 2. Some men are trafficking and/or exploiting women and children and recording the acts they perform. . . . In a study by the Poppy Project in U.K., women had photographs taken of them by traffickers/pimps . . . while a gang-rape was taking place. Women also reported that in the places where they were trafficked pornography was constantly available to men buying sex. 3. Pornography is used in sex trafficking and the sex industry to train women and children what to do. . . . In another survey in the U.K., 35% of trafficked women were exposed to pornography, including being shown pornography to 'groom' them into prostitution. 4. Pornography creates and provides rationalizations for exploiters as to how and why their sexually exploitive behaviors are acceptable. . . . Norma Hotaling . . . believed that pornography . . . normalize[s] prostitution and commercial sexual exploitation . . . , allowing men to more freely engage in these criminal activities."

“everybody is making it.” Once any form of pornography is uploaded, it is easier to groom the subject of the porn into stripping and then prostitution. The evidence is overwhelming that pornography amounts to an advertisement for prostitution and human trafficking.⁷⁷ The victims of human trafficking need the injunction; and this Honorable Court of the United States must give it to them. As a testosterone fueled male, allow me to explain, a person watched porn and eventually thinks to himself, “I want to have a real porn like experience - sex with no strings attached. That looks fun.” The next thing you know the male is converted into a prospective jon and finding himself visiting backpage.com and Tinder. Of course, none of those girls want to engage in prostitution, they might just be hard pressed for money or have been forced into prostitution.⁷⁸ Many of these girls have been raped, abandoned, and abused thanks to the culture. They are completely damaged and in need of a healer.

35. After normal prostitution no longer accomplishes the drug like fix, the jon might fly to Thailand or Malaysia to rent the bodies of 12 year olds - depending the depravity to accomplish the same high. From there, the deceived might digress farther into insatiable depravity by visiting infant farms in Bulgaria. Eventually, they will go to jail or died because innate justice is part of the fabric of the laws of the universe - see cause and effect. Meanwhile the shameful common progression provided could have been avoided if the Device Makers had complied with the existing obscenity laws and sold their products with pre-set filters. Instead of tolerating this kind

⁷⁷ Make no mistake, we have a public health crisis on our hands and a silent epidemic, as a result of the distribution of hardcore pornography through the products sold by the Defendants. "The Defendants provide the crack pipe and the cocaine." Even Eric Holder, despite all of his best efforts to sabotage the United States, acknowledged that pornography is fueling sex trafficking (<https://www.youtube.com/watch?v=8E5ITLcGaqY>)

⁷⁸ <http://fightthenewdrug.org/an-ex-porn-actress-story-the-dark-reality-of-porn/#sthash.IRtBGucI.dpbs>

of cultural under the false banner of freedom, we need to restore a culture of character, honor, and truth.

(4) THE VICTIMIZERS OF SEX RELATED CRIMES NEED THE INJUNCTION

Of the 304 scenes analyzed, 88.2% contained physical aggression, principally spanking, gagging, and slapping, while 48.7% of scenes contained verbal aggression, primarily name-calling. Perpetrators of aggression were usually male, whereas targets of aggression were overwhelmingly female. Violence Against Women October 2010. vol. 16 no. 10, 1065-1085.

36. There is a growing trend where the men engaging in sex related crimes are being overly dehumanized and punished, as the “new target.” This is the wrong response and a bad solution, manifesting the slippery slope of the heart to dehumanize. “Prevention,” not “prosecution” is the answer! This is true even if being tougher on crime is politically expedient by rightwing conservative self-righteous types, who are just as dangerous if not worse than the atheistic liberals. Men should not have to apologize for being born with the reproductive organs that we possess - thank you very much.⁷⁹ (There are a host of radical feminist who want in on this case, and my response is no way.) We are sexual beings. As my old foe Assistant District Attorney Antoinette Welch said recently to my friends at the Tennessean, “*We used to prosecute the seller; now we prosecute the buyer. If not for the buyers, no one would be selling these girls. We want to send the message that we will not tolerate the buying and selling of children.*”⁸⁰ While that sounds valid on the surface, the truth is that the demand side that inspires such criminal conduct should be the paramount target - not the buyer or seller both of whom are victims of a

⁷⁹ Easily accessible pornography found on our mobile devices and laptops creates an atmosphere of overwhelming temptation that hijacks intimacy, depletes oxytocin levels, alters the reward cycle adversely, exploits our biological makeup, and damages children (see the testimonials of FTND). Men are stimulated by sight. To suggest otherwise is the continuation of the suppression of the truth. The manufacturers have no right to partner with predatory pornographers, misguide us with false advertising about the “family friendliness of their products,” and leave us exposed to be injected with perilous pornography addiction. Over time, Pornography steals man power and produces impotency in all men because it conditions us to need the aid of more extreme images to get off.

⁸⁰<http://www.tennessean.com/story/news/crime/2014/11/10/tennessee-prosecutes-sex-trafficking-customer-first-time/18827181/>

perpetrating culture that the Defendants have cultivated. As terrible as rape is, rape at this point can be defined as the over conformity to culture's messages; it is not necessarily a form of deviance, given the fact that pornography is above ground and on our persons due to the Defendants' greed.⁸¹ When it comes to prioritizing prevention over prosecution, my fellow church member at Hillsong, U2's Bono, correctly said, "*this is not a right and left issue, it is a right and wrong issue.*" This is not an opportunity to engage in "man hating" nor "woman hating." Neither is tolerable. First and foremost the emphasis must rest on the fact that both men and women need to be protected from the perilous lie of pornography. People who become child molesters were not born that way. They did not grow up thinking - "hmmm someday I'd like to molest children." Serial killer Ted Bundy,⁸² in his final interview with Focus On the Family's James Dobson, explained that exposure to pornography was the dominating factor that encouraged him to go on a murderous spree of women. As a formerly trained prosecutor by the United States Military, make no mistake, I am not opposed to prosecutions for following such outrageous evil act to established deterrence and justice. But the United States has a mercy-centric justice system. (I've sued the Nashville DA here to help reinforce that point). The Government and the device makers must first have cleaner hands before placing emphasis on prosecuting sex related crimes, no matter how much an cruel prosecutor is interested in increasing their numbers because of their prideful ambition to get ahead. The priority objective can be accomplished by making the decision to access pornography fall on the individual

⁸¹ This is a quote by Marxist Agnostic Feminist Gail Dines who has argued extensively as a feminist that men are not born rapist and jons but culture can make them become that way. She is no "man hater." She is a cheerleader for men.

⁸² <https://www.youtube.com/watch?v=pEzgBk-iYC>

consume to making an intentional choice to access pornography; instead of taking that choice away from him only to prosecute him later for it, (as if Assistant District Attorney's playing a "got ya games" somehow can be passed off as legitimate activity.) Not only do potential victimizers need the injunction, the Government needs the injunction so that it can remain beyond reproach and respectable in the minds of the public instead of being culpable, as it is now. Furthermore, the children and parents of men who may otherwise commit a sex related offense need the injunction so that their family member can stay out of prison.⁸³ Children need their fathers and parents need the sons out of jail.⁸⁴ We owe society a duty to make it so, or otherwise we are guilty collectively of false imprisonment. I am a major proponent of prison reform. For the sakes of sons, fathers, and brothers, the Court should issue the injunction in keeping with the public's interest. Porn provides false permission giving beliefs that lead to

⁸³ The correctional facilities in the United States are not bastions of reformation. Instead, they are confined tanks that keep individuals away from society and cause them to come out worse than before they went in. The church has a monopoly on transformation of the heart.

⁸⁴ I think about a quarter of the state prosecutors in the United States need to spend a week in jail so they can see where they are sending somebody's son or daughter. They might agree with me that we all have a duty to engage in prevention, as human rights matter. I think we have done a great disservice to ourselves and prosecutors for not providing them with more checks and balances.

victimization.⁸⁵ By not forcing on prevention and by treating the symptom, our government has become part of the perpetrating culture itself.

(5)

SCHOOLS AND TEACHERS NEED THE INJUNCTION

Acquire wisdom! Acquire understanding! Proverbs 4:5

37. The injunction should issue for the benefit of teachers and schools. As of late, I've been calling schools guidance counselors to discuss the implications of injunctions from the teachers perspective. Teachers are completely for it. The guidance counselors are unanimously saying the same thing: the pornography the the Defendants distribute is having devastating impact on students and educational objectives. Although many of the private schools have incredibly advanced filtering and cell phone detection software that is costly to them, the burden should not even be on them in the first place to filter. Further, the real problem occurs the second the students leave school and can access whatever they want or whatever wants them. They can access damaging and destructive pornographic content at will in the same way that the predatory pornographers can access them. Students are then bring that knowledge and hyperarousal back into the academic environment, where which is causing disciplinary problems and insurmountable distractions. To top it off, students are becoming "porn ready for dating," which is leading to disastrous traumatization, self-esteem disorders, emotional problems, cognitive impairments, abortions, depression, anxiety disorder, and teen suicide. Students are learning

⁸⁵ Pornography includes performers who never say no and never reject sexual advances. This can increase unrealistic expectations about others, entitlement to have sex, increased frustration with others who do say no, reduced awareness and skill of noticing the unwillingness of partners. Too many cases of men saying that the woman was consenting, when the woman was blacked out and drunk. Here are some false permission giving beliefs that the pornography that the defendants distribute encourage. (1) What I am doing is normal; it doesn't hurt anyone; and everyone is doing it. Therefore, I don't need to change my behavior. (2) Those who have a problem with my behavior are wrong, crazy, prudish, ect (3) .All men go to prostitute. (4) All people want sex with all people all the time. (5) Women enjoy being raped. (5) Women enjoy degrading sex. (6) Children enjoy sex with adults. (7) How bad can child pornography be the library has it as a result of the American Library Association efforts. (8) Sex is not about intimacy, caring, love or respect; sex is not about marriage or having children; sex is recreation; you don't need to know your partner; sex with strangers is stye best and most intense kind of sex. (9) Sex is right (sexual entitlement); sex is a need (myth of need); my please is more important than someone else's pain (sexual narcissism); it doesn't cause anyone a problem (denial).

false permission giving beliefs thanks to the nefarious values of the tech companies and then acting out on one another sexually. Students and teachers have been left to drown in this perpetrating porn cultural that has been permitted by the deregulation of obscenity distributors. This can end.⁸⁶

38. Exposing students to pornography is child sex abuse. As Internet pornography has proliferated, clinicians, psychologists, teachers, and law enforcement officials have noted an increase in the number of children seeking clinical help for issues relating to sexual exploitation, the number of children “acting out” sexually, the number of incidences of child– on–child sex attacks, and the number of incidences of child–produced child pornography. There is a growing body of peer–reviewed research supporting the unequivocal harm to youth from exposure to Internet pornography.⁸⁷ Our teachers are having to deal with the fallout of these things and it is completely subversive to the educational goals of the states. Accordingly, it is the public's interest to allow the injunction to issue for the sake of educators, who perform critical and difficult job.

(6)

MARRIED COUPLES NEED THE INJUNCTION

Ghost WARS Born To Be Mine: https://www.youtube.com/watch?v=K65I_UrPFPQ

"For I hate divorce!" says the LORD, the God of Israel. "To divorce your wife is to overwhelm her with cruelty," says the LORD of Heaven's Armies. "So guard your heart; do not be unfaithful to your wife." Malachi 2:16
<http://www.churchofthehighlands.com/media/message/ancient-family>

⁸⁶ Pursuant to their ongoing pattern of fraud, the members of the porn compact are putting out this false idea that “the jury is still out on whether pornography is harming children.” This is the same unoriginal play undertaken by the Tobacco companies. The teachers, mainly middle school guidance counselors, who I am asking to testify in this case are incredibly persuasive.

⁸⁷ Maryann Laden, PhD, Director of Sexual Trauma and Psychopathology Program Center for Cognitive Therapy, University of Pennsylvania has prepared an extensive compilation of peer reviewed research results on Sexualized Media and Kids, Pornography and Sexual Violence, Pornography and Relationship Damage, Pornography and Criminal Behavior and Attitudes. <http://www.enough.org/inside.php?id=1PCE0227W>.

39. Being married in today's cultural climate is harder than it has ever been, since the inception of our Nation.⁸⁸ The culture literally has an emotional problem with marriage, and assaults it constantly. (I above all can attest that the same-sex marriage proponents do not want marriage. They want to destroy it because it is a Christian institution.) There is nothing more life giving and rewarding than a reciprocal loving relationships between committed members of the opposite-sex. No relationship is like that. The evidence is overwhelming that pornography is wreaking havoc on marriages. Real women are less clickable than ageless porn stars. This was true of my former wife, whose beauty made Christie Brinkley look bad when she was in her prime. The bottomline is that unbroken homes involving married persons of the opposite sex make up the backbone of the United States. Traditional marriages are worth protecting, at the expense of the malicious scam by greedy device makers, whose business practices are arguably doing more harm than good in society as a result of their total indifference to obscenity and copyright laws.

⁸⁸ The anticipated argument of "Anti-censorship" and "total freedom" sounds sexy but ultimately amounts to reducing us to "a fish on the grass." A fish on the grass is not free at all. The fish will be paralyzed and will effectively die. It is only when the fish is restricted to the water that it will be able to move like lightning and flourish. The current way that Defendant's sell their products opens the door to and invites humanity to become a fish on the grass in the area of sexuality and life in general. Total freedom appeals to our pride and makes us slave, by violating the essence of our humanness. The proliferation of viagra type drugs has correspondingly increased with exposure to pornography for good cause. Pornography does not just create crushing expectations for men and women in the area of sex, it produces sexual anorexia, sexual compulsive activity, a concrete fear of intimacy, objectification of women, and sexual dissatisfaction in the long term. Codependency of sex stimulates can form. The images we see leave an impression on us - so shielding our eyes is necessary. Real women are less clickable than porn stars, and every woman and man in the United States should help me push a very large rock back over the black hole in the cosmos if they want to promote hot and healthy sex in a functional relationship. To oppose my demand is to support inferior sex, impotency, loneliness, and personal bondage. (See the Declaration of former Porn Star Shelley Lubben). As it turns out, we simply were not designed to look at pornography, any more than we were designed to use cocaine. A short terms fix at the expense of long term happiness should be discouraged by a collective effect. If great sex is what America really wants, we should promote mystery, modesty, purity, and sex within the confines of marriage. It will take a concerted collective effort by all of us to push our society back in that direction, but we will all be a lot happier and more satisfied if we can united and do so. Doing the wrong this in easy. I don't really like working out, but I don't like being passed on for a gig for being out of shaped. It is doing the right thing that deserves our collective applause. We should foster a culture of merciful accountability that capitalistic conglomerates should ratify not assault.

(7) **THE INTERNATIONAL COMMUNITY NEEDS THE INJUNCTION**

“It really boils down to this: that all life is interrelated. We are all caught in an inescapable network of mutuality, tied into a single garment of destiny. Whatever affects one destiny, affects all indirectly.” Martin Luther King Jr.

<https://www.youtube.com/watch?v=99RGE4OEqlg>

40. The United States is the world’s only superpower.⁸⁹ We are the world’s leading champion on human rights.⁹⁰ I joined the United States Military because I believe in the value system of this County was founded on. It makes us, the US, objectively the “good guy;” not imperialist as the currently President advances in keeping with Alinsky’s “Rules For Radicals.” In order, to remain the world’s leader on human rights, the Government must clamp down on the demand side of human trafficking, by providing me the relief I seek, and not address the symptoms first. As the COPA Courts indicated, prosecuting individuals is not the answer. Filters are. *Am. Civil Liberties Union v. Reno*, 31 F.Supp. 2d 473, 476 (E.D. Pa. 1999).

41. The reason that Eastern traditionalist societies hate the west so bad is because our post modern relativistic values pose a threat to their way of life. It is ironic that the Middle East is one of the largest consumers of pornographic content. But in order to cut down on terror attacks against the United States, the device makers and ISPs must be forced to sell their products with

⁸⁹ Regardless of the fact that President Obama is merely the product of a fatherless home, who subscribes to atheistic radicals like Saul D. Alinsky, and has some outrageously delusional beliefs about America being imperialistic, the United States is the world’s only superpower, and it must continue to operate under the values that allowed it to become that way. Moving out from underneath the truth will not allow us to thrive. It will crush us.

⁹⁰ For anyone in the media, in government, or in the device making field to oppose me is to admit to being a proponent of sex trafficking. There are only a few key players, who at the helm of this sex trafficking racket, who must be held accountable. Our Country has suffered enough humiliation and embarrassment because of horrific decision to endorse racial slavery. To oppose me is to tear open the wound of our Nation’s most egregious scar. Racial slavery, like sex slavery, were both predicated on economic justifications. Yet, we the people of the United States must collectively oppose and resist all forms of slavery, even if it presents a momentary apprehension of an inconvenience on our economic systems. The 13th Amendment commands as much. The economy will get over it, and actually improve, just like it did when we abolished slavery, and later instituted the Civil Rights Act of 1964. History has repeatedly taught us that only a moral capitalistic society can survive. Character development must be made paramount in influential policies. If the implementation of the filtering system saves one girl from being sex trafficked, if it prevents one family from divorce, if it prevents one more young person from having a testimonial like the ones found in the FTND document, then it is worth it. We should all do our part to end suffering, not encourage it. The manufacturers will not go belly up by the implementation of my reasonable and sensible demand.

preset filters. This will constitute an act of good will that will communicate to enemies of this Country that we care about their honor, safety, family integrity, and civil rights, as much as we do about our own. What is a true act of imperialism would be to not be responsive to this problem that we have unleashed onto the world, and do something like send ICANN overseas to make regulating it more difficult. If a terroristic Country acquires weapons of mass destruction, the chances of it using it against us will decrease if the injunction is imposed. The injunction is an affirmative step in right direction towards peace in the war on terror and to suggest otherwise is too simplistic.

42. After filing this lawsuit, the United Kingdom implored the United States to join a joint task force with it to combat pornography.⁹¹ How dare we not be responsive!⁹² We have no excuse in joining the United Kingdoms in curbing back the darkside of technology that our companies

⁹¹ In the summer of 2013, Great Britain's Prime Minister, David Cameron, who proclaimed that pornography was 'corroding childhood', proposed a voluntary national filtering program in the UK, that would not deny access to pornographic content but would require subscribers to take an affirmative step to get it. Key aspects of the UK proposal include the following: "Internet enabled device or internet-based service sold or supplied into the consumer market and likely to be owned or used by children or young people should, by default, come with filtering and blocking software preinstalled and operational to provide protection against exposure to adult content. An age-verified adult ought to be able to modify the preinstalled protective program settings or abandon them altogether, otherwise the defaults should remain; . . . UK-based web hosting companies should ensure publishers making pornography available within the UK have an effective age verification process in place." All four major ISPs in the UK, which account for approximately 95 percent of the market, have implemented the new sign-up procedure for new customers. Existing customers can also ask for the new filters/arrangements to be applied to their account immediately. By the end of 2014, every existing customer will have been asked by their ISP whether or not they want to use the filters—and they will have to make a decision. All this is at zero cost to the customer. See John Carr's blog at <http://johnc1912.wordpress.com/2013/11/18/online-child-safety-big-things-happening/citing-Prime-Minister-David-Cameron-s-speech-outlining-the-UK-initiative>. Entire speech can be found at <https://www.gov.uk/government/speeches/the-internet-and-pornography-prime-minister-calls-for-action>. As of the writing of this article, not all the measures called for by Cameron have come to pass.

⁹² I understand that the first move that President Obama did when he came into office was to return a bust of Winston Churchill to the UK. That was an act of treason in kind.

have unleashed on the international community.⁹³ The President is a coward in this regard, if he does not support legislation that makes ISPs and Device Maker's provide filter options.

(8) THE TRADITIONAL PORN INDUSTRY NEEDS THE INJUNCTION

"The corporatizing of porn isn't something that will happen or is happening, it is something that has happened. It's the Las Vegas all over again: the independent owners, renegade mobsters and visionary entrepreneurs pushed aside by mega-corporations...."
Adult Video News 2009.

43. The traditional porn industry needs the injunction. This lawsuit is not meant to constitute an absolute prohibition on pornography. The hope is to push it back under the dark rock from whence it came. The traditional pornography industry that was monetizing the content and paying taxes has been greatly reduced given the rise of amiture porn sites and free content. The ISPs and Device Maker really are the pornography and music industry rolled up into one.

44. In 2014, only one album has gone platinum. This is because the music business cannot compete with free. The traditional pornography industry that was more regulated, controlled, and complicit with the laws is facing the same fall out that the traditional music business is. The Tech companies have "screwed" the porn business, and in the process, they have become the porn industry itself in the same way that they took over music. They want to take over film and print media as well. The pornography industry, especially bricks and mortar porn shops, should be jumping up and down along side of me screaming for the imposition of the injunction. The Government is missing out on valid taxable revenue streams as a result of the Tech industry's belief that their brand name makes them above the law, when it does not.⁹⁴ For the sake of

⁹³ I wish the Court could attend some of these anti-sex trafficking anti-pornography meetings. There are people from other countries present who are desperate for answers. They feel completely helpless. It is incredibly tragic and totally unacceptable because the porn epidemic is a result of the United States' failure to be responsive this seething evil.

⁹⁴ The moguls of porn are not Hefner and Flynt. Those are small potatoes. We are in the world of porn Billionaires. Fabian Thylmann. He revolutionized the porn industry. Mindgreek is going to have to be taken out.

taxable revenue streams and for pornographers who at least attempt to follow the law better, the Court should issue the injunction.

(9) THE VICTIMS OF AMATEUR, REVENGE, IMPULSE, THEFT PORN, AS WELL AS FORMER PORN STARS NEED THE INJUNCTION

“It is not a scandal. It is a sex crime,” Lawrence told Vanity Fair contributing editor Sam Kashner. “It’s a sexual violation. It’s disgusting.”

45. Here is one that the media can understand, requiring filters on ISPs and Devices would mitigate the damage of pornography leaks and revenge porn. There is a saying, “porn is forever.” Once pornography is uploaded, it can be next to impossible to remove it. Revenge porn is a serious problem. People have lost their jobs and committed suicide after pornographic videos of them were posted, thanks to the “open and share” model that the Defendants and their co-conspirators advance.⁹⁵ The whole Jennifer Lawrence leak scandal that broken in August of 2014, after naked pictures of the actress were intercepted and uploaded without consent, could have been greatly mitigated and minimized if the filter system was in place because the majority of prudence people in society will likely not have the filters removed.⁹⁶ There opinions typically count the most. To discourage porn theft and invasion of privacy, the Court should issue the injunction.⁹⁷

45. There are teenagers and young adults making amature pornography and uploading it,

⁹⁵ Straight-A College Student, 19, Commits Suicide After Bullies Pummel Her For Appearance In Porn Flick. <http://radaronline.com/videos/alyssa-funke-suicide-porn-suicide-bullying/>. For the sake of Alyssa Funke and her family, the Court should issue an injunction.

⁹⁶ <http://www.mirror.co.uk/all-about/jennifer-lawrence-leaked-nude-pictures>

⁹⁷ As someone who lives in Hollywood part of the time. The Court should trust me on this one. If the Court issues the injunction, it should deliberately reference the Jennifer Lawrence matter. The media will back up the Court on that. What I am asking for in this case is inherently right, and the public will come to respect the Court for curbing injustice in this case.

only to then break up with the person they performed with. 90 years from now, the children of the grandchildren could go online and watch their great grandparents engaging in sexual acts with someone other than “grandma or grandpa.” This is more significant than getting a regrettable tattoo. What kind of legacy message does it send? What will that do to a person’s identity to confront such content? Somethings were meant to be private. We simply cannot have a civilized society that operates in this manner without it completely self-destructing under the weight of its lack of insight, morality, and depravity. The Pink Cross Foundation, who attested in Apple, provided an example of a former porn star who got married. Then her husband inadvertently encountered her in porn video online, and he becomes completely traumatized to the point that he left the marriage. Where is the promised freedom in that scenario in the false narrative spewed forth by the device makers and ISPs?⁹⁸ The filter system I seek would have prevented that accidental contact in that scenario. Despite “the religion of evolution,” we have not evolved beyond the fact that we are spiritual beings. We cannot get away from the truths of the New Testament. To mitigate the damage of defamation, invasion of privacy, and shameful conduct, the Court should issue the injunction in keeping with the public’s interest for the victims of leaked pornography.

10.

THE CHURCH NEEDS THE INJUNCTION

“For our struggle is not against flesh and blood, but against the rulers, against the authorities, against the powers of this dark world and against the spiritual forces of evil in the heavenly realms.” Ephesians 6:12

*Discussion with D.A. Carson, Tim Keller, and John Piper
<https://www.youtube.com/watch?v=EIC7cRnzZ3Y>*

46. We are not merely animated pieces of meat, a bundle of chemicals, or accidental particles.

We are beautifully and wonderfully made beings worthy of protection. At this point in history, it

⁹⁸ The word “mom” and “porn” do not belong in the same sentence together. Think about Anna Nicole Smith. Her son committed under the weight of the embarrassment of his mom, who herself was raped by her mother’s boyfriends while growing up. Anna committed suicide a few months after her son died.

takes more faith not to believe in the God of Lincoln, Washington, and the Bible, referred to expressly in the Bill of Rights, than it does to believe in Him. As the world gets darker and darker, the Church gets brighter and brighter. Even quantum mechanics teaches that “what we see is unstable” and that “what we see” is not all there is. Cosmological and teleological deduction points to a Divine Father and savior embodied in the absolute truth in the form of a person - Jesus Christ - not a relativistic truth, invented off the top of the head of some arrogant narcissist, who hopes to lead us towards disintegration. The impact of pornography on the Church should not be written off for benefit of the palpable idols of money and pride. The Church has the truth. The Bible makes up the yardstick of reality in the United States. It is the source that tells us what is right and wrong at the expense of the peculiar individual sentiments of a selfish person. Even Richard Dawkins admits that, the master narrative of the United States Constitution unquestionable is derived from the New Testament. Therefore, the Bible is our Nations compass regardless of anyone’s personal beliefs to include my own. The United States Supreme Court long since established that "America is a Christian Nation" in *Church of the Holy Trinity v. United States*, 143 U.S. 457 (1892). This is true regardless of how groups like the GLAD, American Library Association, ACLU, ect feel. These groups simply have emotional problem with God and have no basis for even seeking what they call justice in the first place. They do not even know how to define truth. The fact that the United States is a Christian Nation does not mean that people of other beliefs are not welcomed. It means that the policies of the United States should mirror Christianity because the principles produce human flourishing. Libertarianism and dictatorship fails. What is clear is that all of us are arguing a set of exclusive claims and trying to convert the other side, but Christianity involves a man who claimed to be

God dying on a cross and loving his enemies for their atonement. No other belief system offers anything like that. This allows us to live along side our neighbor who disagree with us, instead of beheading them like ISIS is doing right now in the Middle East.

47. Let's consider some statistics regarding pornography and the church. First, one study showed that 50% of all Christian men and 20% of all Christian women are addicted to pornography.⁹⁹ Second, 30% of pastors in a certain area viewed pornography within the last 30 days. Third, 41% of women said they had deliberately viewed or downloaded pornographic pictures and movies.¹⁰⁰ Forth, 34% of Christian women struggle with an addiction to pornography.¹⁰¹ 56% of divorces involve one party having "an obsessive interest in pornographic websites."¹⁰² Before ISPs and the porn compact, these numbers were unheard of.

⁹⁹ Leadership Journal, "The leadership survey on pastors and internet pornography," Christianity Today, January 1, 2001, <http://www.christianitytoday.com/le/2001/winter/12.89.html> (accessed June 9, 2014); Survey, "ChristiaNet poll finds that evangelicals are addicted to porn," ChristianNet, 2007, (<http://christiannews.christianet.com/1154951956.htm> (accessed June 6, 2014).

¹⁰⁰ Pamela Pail, *Pornified: How Pornography Is Damaging Our lives, Our Relationships, and Our Families* (NY: Henry Holt & Co, 2005).

¹⁰¹ Ramona Richards, "Dirty Little Secret," *Today's Christian Woman*, September 2003, <http://www.todaychristianwoman.com/articles/2003/september/5.58a.html> (accessed June 9, 2014).

¹⁰² The Effects of Pornography on Individuals, Marriage, Family and Community. Marriage and Religious Inst., Family Research Council, Love and Responsibility Project: Center for Study of Catholic Higher Ed. Scribd. <http://newsbusters.org/blogs/matthew-balan/2010/07/28/cnn-highlights-pornographys-destructive-effects-society>.

48. Christians are especially susceptible to the perils of pornography.¹⁰³ By not being responsive to this matter, it amounts to a declaration of war on Christians by the Government itself, which was founded at Plymouth rock on Christian values in 1620 (see Mayflower Compact). Scientific studies have conclusively shown that Christians per capita have more oxytocin than non-Christians. Christ Followers are not individuals who are trying to act morally because they must or because they are under compulsion, like the Islam followers, but because they get to. Christians seek to live a moral life in response to what God has done for them through sacrificing His son, Jesus Christ, not because they are trying to earn God's approval under fearful coercion. Christians are lovers, not just fighters, because through the power of the Holy Spirit, they have the capacity to love with God's love. This is why areas dealing with "sex" are especially tempting for Christ Followers. In modern day society, nearly everyone is required to have devices that connect to the internet for school or work related purposes. The anonymity, affordability, and aggressive nature of predatory pornographers causes Christians to have terrible struggles with pornography.¹⁰⁴ There have been pastors whose entire family, future, and life was

¹⁰³ This problem is especially bad in the religious communities. Believers have discover an easy way to escape the pressures of life: self-medication. All we have to do is push a button on the Defendants' devices and, at no cost, we have access to an endless supply of an incredibly potent drug. And no one knows that we are doing it, and no one said anything about the psychological and biological costs involved. We can self-medicate daily and still retain our reputation and standing in our family, church and community for a time being, until the addiction spirals, as they tend to do. The non-responsiveness of the government is direct evidence of the silent war on Christianity and an attempt to stamp it out. Specifically, here is how it played out for me. I have never smoked a cigarette. I have never taken an illegal drug. I rarely if ever drink alcohol. But members of the opposite sex are a palpable weakness because Christians like myself have a whole lot of oxytocin built up. We are lovers, filled with God's love. Pornographers know that and they target the religious, converting laptops and cell phones into a cocaine-type cross, after pornographic pop ups erode our ability to deny consent.

¹⁰⁴ Many Christians and non-Christians alike stay trapped in sexual addictions, including pornography, because the church has not historically been a safe place for the sexually broken to bring these struggles into the light of Christ's unconditional love and forgiveness and to receive the pastoral help, counseling, and healing needed for restoration. Instead, many remain stuck in their shame, for fear of harsh judgment.

crushed as a result of interaction with pornography on devices because of the failures of the ISPs. (Some of these victims have been asked to provide declarations for this case.)

49. Christians, by and large, desperately want there to be a filter system in place that will allow them to resist temptations and enticements, as I have demanded here. They do not want this door open, despite how bad the ISPs wants to convert them to their sadistic homosexual and perverse beliefs. Such Christian believers deserve the fundamental right to be free from guilt and shame that comes from in conduct that violates the givenness of our nature. They must have the freedom to practice their religion in keeping with the principles of the First Amendment. This is true despite the radical left's irrational war on Christianity. Atheistic attack Christians but provide no logical answers to almost anything. Secular Humanism is a religion itself. What we have seen is that it is impossible to leave religion out of the public square because we are all advocating a set of exclusive unproven faith based assumptions. For the Government to refused to act in the face of the damage that pornography continues to inflict on persons of faith, such nonresponsiveness amounts to a violation of the exercise clause. In turn, it also amounts to a violation of the establishment clause, as secular-humanism-post modern relativism is ratified as a National religion at the expense of the one truth religion that our Nation was founded on.¹⁰⁵ For the sake of Christians and their constitutional right to believe in the Bible, the injunction must

¹⁰⁵<http://globalchristiancenter.com/mens/overcoming-temptations/16765-pornography-in-the-church-a-new-epidemic>. The use of pornographic material among Christians continues to rise, reaching near epidemic proportions in the church. Shocking statistics released by Net Accountability reveal that 50 percent of evangelical pastors viewed pornography last year. A study by Internet Filter Review revealed that 53 percent of Promise Keeper men viewed pornography the week before the survey, and 17 percent of women admitted to struggling with pornography addiction. Focus on the Family recently reported that one in seven calls to their pastoral care line concern Internet pornography. Why the recent rise in pornographic use among Christians? Many blame the Internet, which affords users anonymity, affordability, and accessibility. Individuals reluctant to purchase pornography at a local convenience store where others might see them can now indulge their fantasies in the privacy of their own home, sitting in front of the computer. Some delude themselves into thinking that it's "no big deal."

issue in accordance with the First Amendment, otherwise the Court is ratifying the unconstitutional enforcement of obscenity statutes perpetrated by a lawless executive.¹⁰⁶

(11) PARENTS NEED THE INJUNCTION

Train up a child in the way he should go; even when he is old he will not depart from it. Proverbs 22:6

50. Besides targeting teens, misleading the public about the amount of porn accessible on their products, twisting the first amendment, scapegoating content makers, fingerprinting content providers, the most fraudulent tactic employed by the Defendants and their co-conspirators has been to “blame the parents” in unison with device makers. It is not the job of the parents to make the Defendant’s products safe, any more than it is their responsibility to bring the seat belts to the amusement park to the make the roller coast ride safe either. It’s the sellers duty. It is common sense. The ISPs distribute obscene content to filterless portable devices with inept parental controls. The ISPs products are designed make the parents ability to monitor impossible; hence the name, “mobile devices.” The products are not stationary. And even if they were, the Defendants are still charged with providing the safety mechanisms and the default to opt-in to adult material.

51. Steve Jobs himself did not allow his own kids to use Apple products, but Apple has no problem selling their products to everyone one elses children.¹⁰⁷ I should not be the only one with a problem with that here in this case. When Steve Jobs was acting as a parent, even he himself would have been a beneficiary of the filtering program that I am pushing. As the declarant John Gunter from Clean Services Foundation established, “parents do not know what kind of filtering software to get for their widget that comes from the varying device makers.

¹⁰⁶<http://ministrytodaymag.com/index.php/ministry-leadership/ethics/20339-pornography-the-pink-elephant-in-the-church>

¹⁰⁷ <http://elitedaily.com/news/technology/steve-jobs-limited-kids-technology/756277/>

Parents don't know if it the filters really work. They don't know if their children know the 'work arounds.' If the device makers make one little change to their products, the filters become obsolete." The Device Makers and ISPs can constantly send out filter updates. The Device Makers and ISPs can custom make filters based on their insider knowledge to help remove the outlandish the emotionally distressing pressure placed on parents that never should have been there in the first place. The ISPs can reinforce the filters on devices by zoning pornography by providing filters and zoning pornography to the unused ports, as Ralph Yarro from Think Atomic has established in the attached exhibits. The Defendants can apologize to parents and the spouses of divorce by paying out the nose in this action. It is in the public's interest that the injunction issue to help parents do their job more effectively, starting by taking the unfounded burden off of them through the issuance of an injunction.

(12) THE DEVICE MAKERS AND ISPS NEED THE INJUNCTION

Aragorn: "Open war is upon you whether you would risk it or not" Lord of the Rings: The Two Towers

52. Device Makers and IPSs need the injunction because they are setting themselves up to be as hated as the Tobacco Companies as the culture gets more in touch to how their filterless products are doing to society. Groups like Fight The New Drug, Pink Cross, Beggars Daughter, Enough Is Enough, Stop Porn Culture are spreading the truth about the Device Makers and ISPS that is cultivating well deserved animosity. There are children who do not have fathers because pornography desensitized the dad. These children are ready to fight the ISPs and Device Makers.¹⁰⁸ The Nation is getting poisoned from the inside out the ISPs and Device Makers are to blame - they have created the platform for content providers maliciously. The tech companies are setting themselves up to have the public completely turn against them. The injunction will

¹⁰⁸<http://www.faithit.com/an-open-letter-to-the-dad-looking-at-porn/#.VIIti0P3S8Fh.facebook>

actually allow the members of the porn compact to finally sell products that are actually “family friendly.” The tech companies will actually no longer be violating obscenity laws and engaging in fraud on a colossal scale. Employees at the ISP and Device companies can finally **bring their conscience to work with them.** That will be a first for many.

53. Furthermore, the Defendants are missing out on an opportunity to charge a sin tax against the perverted who engage in damaging conduct that the states have to pay for. The very idea that individuals who want to avoid looking at porn are being tasked to pay geek squad to install filters is completely ridiculous. Instead, the device makers and ISPs should charge either an annual or a one time flat fee to have the porn filters deactivated. This money can go towards improving filters. It can also be taxed by the Government to help pay for the prosecution of sex trafficking and the fallout from divorce.

54. Device Makers and ISPs need the injunction because they cannot afford to piecemeal break the porn compact. Like the Mafia, the member of the porn compact are holding each other from breaking away. In the auto-industry, Ford attempted to break the compact with the other dealers by being the first to provide a “safety packet.” There was a huge demand for them, and the packets sold like mad, but under pressure from GM, Chevy, Chrysler, Ford was forced to stop offering safety packets. Its was only when Nader and Congress stepped in and said “enough is enough” that Ford was free to act in accordance with its conscience.¹⁰⁹ In considering the cases here, I believe that some of the ISPs in America perhaps do want to take a hardcore stand against pornography in some sector of the company by breaking away from the enterprise. This is what has occurred in the UK after all. But as it stands now in America, if any ISP or Device Maker

¹⁰⁹ US Department of Transportation National Highway Traffic Safety Administration (January 1, 1968). "Title 49 of the United States Code, Chapter 301, Motor Vehicle Safety Standard No. 208 - Occupant Crash Protection Passenger Cars"

“breaks away,” those who do not will have a competitive advantage because pornography is such a shame based matter that the adults who want porn will switch to the ISPs that don’t make them opt out. Even though the tech companies have formed the porn compact, they still compete for business. Therefore, it is in the device makers interest as well as the publics that the injunction issue. To the Honorable Senator Hatch and the Honorable Court, I say that we need blanket policy. Just like “no” soda company should be allowed to sell their products with cocaine. No ISP should be allowed to automatically sell their products with the porno ingredient. Adult customers need to opt-in after receiving a warning from the seller.

(13) THIRD PARTY FILTERING COMPANIES NEED THE INJUNCTION

55. Since filing this lawsuit, I have spoken directly to the CEOs of Covenant Eyes, Net Nanny, and Content Watch. I predict that some of them will participate in this action. None of the founders of these companies got into the filtering business to become rich. They launched third party filtering companies because they are outstanding patriots, who are concerned about the welfare of families and children. They are trying to curb the poison that the Device Makers and ISPs have unleashed into society because they are American patriots. The testimony of Covenant Eyes founder, Ronald J Dehaas is especially compelling.¹¹⁰ All of these men would love nothing more than to be put out of business by Court order or statute that made all Device Makers sell their products with custom made preset filters. The porn pandemic is not their problem to solve any more than it is the parents job. It is the sellers responsibility. Outside third party filtering companies cannot develop a “silver bullet” because they lack insider knowledge. The ISPs have

¹¹⁰ In 1992, Mr. Dehaas lost his entire family, his wife Pat, his daughter Anne, and his son Stephen, in a terrible car crash, which caused him to suffer immensely. He relied on his Christian faith to get him through the experience. After experiencing the suffering of losing his family, he wanted to make sure that no one else experienced that kind of pain and suffering needlessly. Given the correlation between watching porn and divorce and the dangers that porn presents to developing teens and young adults, Mr. Dehaas launched Covenant Eyes with the intent of benefiting the greater good.

the ability to turn “porn on and off,” in the same way that the water companies can turn the water “on and off.” The same is true of the electric company. At best, the third party filter companies are engaged in “guesswork,” regarding the devices. (The filters do not apply to ISPs who can control their own products.) Any time the tech companies make a single change in updating operating systems, filtering programs can become completely obsoleted on devices. The Device Makers and ISPs want to keep the conversation in the area of parental controls and third party filter solutions because they know that neither work. The mere presence of the third party filtering companies points towards the ISPs liability; their presence does not mitigate it. Somehow the American public has bought “the blame the parents” scam, like they bought into the fiction of “gay rights.” The enterprise is laughing its way to the bank at the consumers expense. This scenario involving third party filters and parental controls parallels the Tobacco industry marketing cigarettes as containing “low tar” as if to give the impression that the brand was “safer.” Device Makers are pulling plays right and left out of the Tobacco Industry’s playbook. In speaking with the CEOs of the main third party filtering companies, one thing was crystal clear, if the Device Makers were Court ordered to work with them directly, they could develop filtering software that would be 98% more effective. I have no objection to the Device Makers being required to partner with them to ensure that hardcore attempts to solve this problem are accomplished. But like Nader with seat belts, I want the problem solved as most effectively as humanly possible, even if it means eradicating all third party filtering companies without compensation. Yet, in the interest of justice, I would like to see the Defendants and their co-conspirators be required to reimburse and buy out the third party filtering companies for taking the initiative to hold at bay the incalculable evil that the device makers have unleashed

into the world by bringing porn aboveground, into our homes, and onto our persons. But even with the Device Makers being regulated, the ISPs themselves must be required by the Court to allow for opt-in so that the existing obscenity laws are not reduced to blue law.

56. As it stands now, third party filtering companies are in a position where they are in a persistent state of customer dissatisfaction and breach because they cannot deliver. This is because they lack the insider knowledge of devices they are trying to provide solutions for. Additionally, they lack the ability to send filter updates, as certain aggressive pornographers create “work arounds.” For the sake of third party filtering companies the injunction should be imposed.

(14) ANTI-PORNOGRAPHY AWARENESS GROUPS NEED THE INJUNCTION

57. I have a tremendous respect for awareness groups to educate the public on the harmfulness of pornography. We all should. One thing that I hope that the Court appreciates is that I am not fighting pornography as a lifestyle. I am not part of an anti-porn organization that is fighting pornography and asking for handouts, not that there is anything wrong with that. The ISPs and Device Makers must be required to pay out millions to these patriotic groups. Dr King stated, *“make a career of humanity. Commit yourself to the noble struggle for human rights. You will make a greater person of yourself, a greater nation of your country, and a finer world to live in.”* *Martin Luther King, Jr. , 18th April, 1959.* I am merely a victim of the Defendants porn scam, who was personally injured due to the malicious scheme between ISPs, Device Makers, and predatory pornographers. There are all of these “family groups” who sincerely believe that they are fighting pornography and human trafficking, when they may be making the problem worse without knowing it under the current condition. A lot of these anti-porn groups are engaging in

the “awareness” and parental control narrative, which is the box that the tech companies and the pornographers want to keep them in. Consider the Tobacco fight. The awareness campaigns are effective, when taken in conjunction with the fact that (1) the purchaser has to be 18 and up to buy at the store; (2) there are warning labels on the cigarette packets; and (3) there is a sin tax imposed. Awareness campaigns without effective safeguards may turn people onto damaging smut. The Cook the Putnam County stings on MSNBC regarding prostitution busts following stings surrounding backpage.com is making backpage.com prostitution business dramatically increase. If an awareness group was to go into a school and say whatever you do don’t visit youngpornmovies.com, barelylegal.com, and tortureporn.com the odds are by that afternoon the students just might do that exactly. Its like saying “don’t think of a pink elephant.” But if the awareness campaigns are coupled with actual filter safeguards, “now we are cooking with peanut oil,” as my fellow church member at Whites Ferry Road, Phil Robertson says.¹¹¹ For the sake of the “awareness” anti-trafficking and anti-porn groups, the injunction should issue so that they can know that they are doing more good than harm.¹¹² We have to come to terms with the nature of the human heart and stop lying to ourselves. At the same time, I am not a fan at all of making pornography outright illegal. By way of analogy, people should not go to jail for being “homosexual,” like in Russia, but Russia is right in that the lifestyle should not be encouraged by

¹¹¹ I think about the examples of Twisted Sister “Under the Blade” or Easy E’s “Cop Killer Record” with Tipper Gore’s initiatives regarding parental advisory stickers. No one can deny that Mrs. Gore was well intended by encouraging teens not to buy Easy E and Twisted Sister type records. But because there were no material safeguards in place, Mrs. Gore did caused these kinds of record to sell more than otherwise. Spreading awareness in the absence of real safeguards can literally accomplish the exact opposite desired result. (To not pick on Gore too much, it was Bush Senior, who dropped Easy E’s name at a press conference, which really caused album sales. It is Murphey’s law to tell a man not to touch the wet paint, he will touch it to make sure. It’s also called the “sin paradox.” “To err is human; to forgive, divine.” Alexander Pope (1688-1744)

¹¹² I’d like to make it clear in the record that if the Court will provide me with the injunctive relief that is requested, I will deflect all credit onto these anti-pornography groups who are in this fight for the long haul. Make no mistake, I am relying on a lot of their materials and resources in litigating this action to remedy a personal injury.

law because it is subversive to human flourishing and irredeemably nasty. To discourage activity lifestyle choices that produce injury is not an act of hate. It is an act of sacrificial love for one's fellow neighbor.

(15)

LAW ENFORCEMENT NEED THE INJUNCTIONS

<https://www.youtube.com/watch?v=O6PykRIIBFg>

58. The Defendants and their co-defendants' pornographic distribution network are exposing law enforcement to increased risk and wasteful expenditure of excess resource. As the writing on the wall becomes clearer that marijuana may become legalized in the United States and as the demand side of sex trafficking continues to rise thanks to the greed of the Defendants and their co-conspirators, more and more cartels and organized crime groups are moving into human trafficking. The data is horribly terrifying and Device Makers and ISPs are to blame. I am asking FBI agents to testify to this in this case if permissible from higher is authorize. Mexico is becoming out of control in this manner in areas just outside our borders of Texas.¹¹³ This is exposing law enforcement to increased risk. As the penalties for human trafficking violations increase, traffickers will go to more extreme measures not to get caught. Consequently, law enforcement is exposed to increased risk. Prostitution is becoming more rampant and yet harder to track because of the communications through the internet. This is causing law enforcement to consume more resources and time in setting up prostitution stings. By requiring the Defendants and their co-conspirators to sell their products with filters will serve as a major benefit to law enforcement in variety of ways. The Court owes it to these civil servants alone to provide me with the relief requested. The Attorney General's office should go after the Device Makers and

¹¹³ <http://www.insightcrime.org/news-briefs/human-trafficking-drug-cartels-mexico>; <http://world.time.com/2013/07/31/the-mexican-drug-cartels-other-business-sex-trafficking/>; <http://www.cnn.com/2010/WORLD/americas/08/26/mexico.human.trafficking/>

ISPs for having cultivated a platform for sex trafficking to thrive at the expense of the taxpayers. To save on enforcement cost, the injunction must issue against ISPs.

59. Lets consider the cost of regulating child porn. Although substantially undermanned and underfunded, the Justice Department and FBI have focused their enforcement efforts almost exclusively on violations of child pornography and child stalking laws. Despite these efforts, child pornography is one of the fastest growing industries on the Internet. There has been a 774% increase in the number of child pornography images and videos reviewed through the National Center for Missing and Exploited Children's Child Victim Identification Program from 2005 (1.98 million images/ videos) to 2011 (17.3 million images/videos) Most victims of child pornography are prepubescent with a growing trend towards depicting younger children, including, horrifyingly, infants. The burden out in enforcement is a serious problem and regulating this matter is incredibly difficult and costly for tax payers. Therefore, prevention should be the focus. Issuing the injunction will serve the public's interest.

(16) THE FEDERAL COURTS AND CONGRESS NEED THE INJUNCTION

<http://www.churchofthehighlands.com/media/message/breaking-the-spirit-of-asherah>

60. The Federal Courts need the injunction to improve its reputation with the American public and to strengthen the rule of law. When Courts hand down decision that offend transcultural law, they lose respect and authority amongst the reasonable people of ordinary prudence within

society.¹¹⁴ The Federal Courts struck down the CDC and the COPA, which were theoretically designed to shield the world from pornography but amounted to an intrusive assault on individual consumers for the failures of the Tech companies.¹¹⁵ The Tech companies' "greedy little fingerprints" were all over those pieces of legislation, where "individual users" were regulated, instead of the tech companies themselves in keeping with the false "blame the

¹¹⁴ Here is one example that is especially bad: in *Ashcroft v. Free Speech Coalition*, 535 U.S. 234 (2002), the USSC struck down two provisions of the child Pornography prevention act of 1996 because they abridged "the freedom to engage in a substantial amount of unlawful speech." The provision was struck down prohibited "any visual depiction" that "is or appears to be, of a minor engaging in sexually explicit conduct." Overnight arrive hundreds of thousands of teen look alike porn videos with titles like "Daddy's Little Whore;" "Pigtail Teens Pounded;" and so forth. Google trend search interest index from 2004-2013 shows that "teen porn" has gone up 215% since the Ashcroft decision. While I understand the USSC's controversial decision in Ashcroft, what I cannot tolerate is that these kinds of videos are not just readily available, they are being shoved in our faces. These kinds of videos need to be behind the filter/shield that I seek. Otherwise, the Courts are impeaching the legal profession that I went to school for. This situation invokes: "Acquitting the guilty and condemning the innocent-- the LORD detests them both." Proverbs 17:15

¹¹⁵ For the Court's benefit, here is the litigation history of COPA, the federal government was enjoined from enforcing COPA by a court order around 1998. In 1999, the United States Court of Appeals for the Third Circuit upheld the injunction and struck down the law, ruling that it was too broad in using "community standards" as part of the definition of harmful materials. In May 2002, the Supreme Court reviewed this ruling, found the given reason insufficient and returned the case to the Circuit Court; the law remained blocked. On March 6, 2003, the 3rd Circuit Court again struck down the law as unconstitutional, this time finding that it would hinder protected speech among adults. The government again sought review in the Supreme Court. On June 29, 2004, in *Ashcroft v. American Civil Liberties Union (ACLU)*, the Supreme Court upheld the injunction on enforcement, ruling that the law was likely to be unconstitutional. Notably, the court mentioned that "filtering's superiority to COPA is confirmed by the explicit findings of the Commission on Child Online Protection, which Congress created to evaluate the relative merits of different means of restricting minors' ability to gain access to harmful materials on the internet." The court also wrote that it was five years since the district court had considered the effectiveness of filtering software and that two less-restrictive laws had been passed since COPA, one prohibiting misleading domain names and another creating a child-safe .kids domain, and that given the rapid pace of internet development those might be sufficient to restrict access by minors to specific material. The court referred the case back to the district court for a trial, which began on October 25, 2006. In preparation for that trial, the Department of Justice issued subpoenas to various search engines to obtain Web addresses and records of searches as one part of a study undertaken by a witness in support of the law. The search engines turned over the requested information, except for Google, which challenged the subpoenas because it apparently has something to hide. The court limited the subpoena to a sample of URLs in Google's database, but declined to enforce the request for searches conducted by users; Google then complied. On March 22, 2007, U.S. District Judge Lowell A. Reed, Jr. once again struck down the Child Online Protection Act,[7] finding the law facially in violation of the First and Fifth Amendments of the United States Constitution. In addition to the plaintiffs ACLU et al., several witnesses testified in defense of first amendment rights on the Internet, including the director of the Erotic Authors Association, Marilyn Jaye Lewis.[8] Reed issued an order permanently enjoining the government from enforcing COPA, commenting that "perhaps we do the minors of this country harm if First Amendment protections, which they will with age inherit fully, are chipped away in the name of their protection." The government again appealed, and the case was heard before the Third Circuit. On July 22, 2008, the 3rd U.S. Circuit Court of Appeals upheld the 2007 decision. On January 21, 2009, the United States Supreme Court refused to hear appeals of the lower court decision, effectively shutting down the law.

parents” rhetoric that influenced Congress. Yet, the Courts’ decisions to strike down these laws as unconstitutional creates the appearance that our Courts are proponents of pornography, when they never have been. The Courts struck down these laws to protect individual consumers from prosecution and persecution, as a result of a lawless platform created by the greedy Tech companies and their pornography partners. The Courts were “reluctant” in striking COPA, which was a fact that the general public tragically missed.¹¹⁶

61. The Federal Courts not only reluctantly struck down COPA, they provided a better alternative solution - “filters.” *American Civil Liberties Union v. Reno* (E.D.Pa.1996) 929 F.Supp.824, 832–833, *affd. sub. nom. Reno v. American Civil Liberties Union*, (1997) 521 U.S. 844, 117 S.Ct. 2329, 138 L.Ed.2d 874; *Ashcroft v. Am. Civil Liberties Union*, 542 U.S. 656, 669-70, 124 S. Ct. 2783, 2793, 159 L. Ed. 2d 690 (2004). The “filtering solution” that the United States Supreme Court and the other Federal Courts championed as the better alternative is the same filtering system that I am demanding here and now. The American public did not pick up on the fact that the Court provided a better alternative and that Congress has not been responsive because it has been bought off by the ISPs and Device Makers with porn money. As a result, I cannot count the number of “so called family groups,” who I have personally heard besmirch the reputation of the Federal Courts for their decision to strike down COPA, when the Court’s decisions were Constitutionally sound. It is totally infuriating; Congress has left the Supreme Court out to dry,

¹¹⁶ "The protection of children from access to harmful to minors materials on the Web, the compelling interest sought to be furthered by Congress in COPA, particularly resonates with the Court. This Court and many parents and grandparents would like to see the efforts of Congress to protect children from harmful materials on the Internet to ultimately succeed and the will of the majority of citizens in this country to be realized through the enforcement of an act of Congress. Despite the Court's personal regret that this preliminary injunction will delay once again the careful protection of our children, I without hesitation acknowledge the duty imposed on the Court and the greater good such duty serves. Indeed, perhaps we do the minors of this country harm if First Amendment protections, which they will with age inherit fully, are chipped away in the name of their protection."

and so I am here with my personal injury, saying here is your chance at redemption - even if it's an inferior secondary consideration.

62. The public failed to see that the Supreme Court in Ashcroft that ratified the striking down of COPA was pretty much at the same time screaming at Congress by saying: "*Congress undoubtedly may act to encourage the use of filters*" [emphasis added].¹¹⁷ Hello! We call that being "passive aggressive" in the military. Seriously, how does it get any clearer that the USSC was telling Congress to pass filter legislation? So, what's the problem? Why are we here? Why has Congress not protected us? The answer: "fraudulent lobbying groups" paid for and controlled by the the Defendants and their co-conspirators, which forms a this racketeering Enterprise predicated on obscenity violations. Also, another problem is huge campaign contributions paid out by the tech companies and their success in duping the public with their shallow "blame the parents" rhetoric. Congressional Representatives, Republicans and Democrats alike, have been bought off with porn money. We have "Democracy for hire" problem, but that is where the Court come in to save the day, like in the civil rights movement of 1964, where Rev. King did not argue that our Nation was "too Christian." He argued that our Nation was not Christian enough.

¹¹⁷ Not only did COPA wrongfully target individual consumers, COPA had two other fatal flaws that the United States Supreme Court identified in striking down COPA. First, a Congressional Commission found that "filters" were a more effective and least restrictive solution to the porn problem. So, in light of that what was the Court supposed to do? Additionally, the United States Supreme Court recognized that COPA did not have the ability to regulate overseas porn websites. The USSC stated: "Filters, moreover, may well be more effective than COPA. First, the record demonstrates that a filter can prevent minors from seeing all pornography, not just pornography posted to the Web from America. That COPA does not prevent minors from accessing foreign harmful materials alone makes it possible that filtering software might be more effective in serving Congress' goals. COPA's effectiveness is likely to diminish even further if it is upheld, because providers of the materials covered by the statute simply can move their operations overseas." The Court also stated: "First, a filter can prevent minors from seeing all pornography, not just pornography posted to the Web from America. The District Court noted in its fact findings that one witness estimated that 40% of harmful-to-minors content comes from overseas. *Id.*, at 484. COPA does not prevent minors from having access to those foreign harmful materials. That alone makes it possible that filtering software might be more effective in serving Congress' goals."

63. We saw how much power and mind control the Tech companies have over the public when they responded to SOPA causing the bill to fail.¹¹⁸ It has been my first hand and personal experience that Congress wants to do something about the porn problem but Congress is afraid of public backlash because there is a false apprehension that to regulate music and obscenity violates the freedom interest of individual consumers, when that is false narrative that has been floated by the predatory pornographers and the Tech companies to such an extent that they are rightfully being sued for wire fraud under the racketeering statute here in this action.

64. Therefore, the Senate and House need the Court to hand down an injunction so that they can look everyone in the eye and say that “they had no other choice but to pass uniform legislation” that makes all Device Makers and ISPs sell their products with custom made filters as sought here with in person accountability system.¹¹⁹ The injunction ties the hands of the Tech companies and frees Congress to act as it really wants to inflict a serious blow to human trafficking in the defense of a severe internal threat to national security.

65. Furthermore, I would like to see the legislation cover “Top level down domain naming,” where all porn sites are required to register “.porn” not “.com.” Such a requirement is a low burden. This would make filtering easier for the device makers and ISPs. Such a burden is very minimal on individual domain holders. I want to see music sites require “.music” and film sites

¹¹⁸ Since SOPA failed, there has not been a single record to go platinum in 2014. The incentive to make or buy art is not there. This has decimated the music economy in music city and across the globe. See my interview with the Nashville Scene <http://www.nashvillescene.com/nashville/the-sopa-bill-may-be-dry-docked-but-the-battle-over-online-piracy-rages/Content?oid=2797644>

¹¹⁹ For Congress’s sake in drafting legislation, I want to see internet zoning as set forth by Think Atomic incorporated, as part of the solution. The ISPs have additional portals that are not being used. Music and pornography must be zoned to these portals by force of law so that there can be actual control. By the flip of a switch, ISPs can help determine if porn is allowed to flow into a home or not. The UK is focusing on that concept as a solution. But internet zoning must be coupled with filters because the device makers are the head this venomous snake.

with “.film” not “.com,” so that infringement can be regulated in keeping with the Copyright Act.¹²⁰ And revenue streams for the arts better monetized. Also, as part of the legislation, I want to see Federal Government encourage all states to pass the Covenant Marriage Act, given the unbelievable assault on marriage in this Country with answerless atheistic liberals who have an extreme emotional problem with the idea that they are not god.¹²¹ As this case will demonstrate the politic of medicine is a nasty business. But encouraging more christian marriage counseling is medicine working at its finest. On balance, to repair the Federal Court’s reputation in this area and to free Congress to act against sex slavery, the Court must issue the injunction.

B. BALANCING EQUITIES

The LORD detests dishonest scales, but accurate weights find favor with him. Proverbs 11:1

66. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. All the ISPs in America have to do is to follow the UK’s ISPs in providing filtering options. The plan presented by Ralph Yarro at Think Atomic is more than reasonable. The IPSs have a duty to provide consumers a choice as to whether or not they want to be forced to interact with pornography or not. The ISPs have a duty to honor the community standards and not distribute pornography into a person’s home without consent. The ISPs can zone pornography to the unused ports. Literally by the flip of a switch the

67. Furthermore, the “its too hard” to implement the face to face accountability password/warning program is merely another falsity in keeping with a lengthy record of fraudulent

¹²⁰ The evidence suggest that President Obama saw that idea being cultivated, and he attempted to send ICANN overseas in keeping with a pattern to subvert the best interest of the Nation due to his radical delusional value system.

¹²¹ In three states (Arizona, Arkansas, and Louisiana) of the United States, a covenant marriage is a legally distinct kind of marriage, in which the marrying couple agree to obtain pre-marital counseling and accept more limited grounds for later seeking divorce. Generally, covenant marriage statutes prohibit no-fault divorce.

misdirection championed by the ISPs. The ISPs send out a technician to the customers house. The Technician can check for proof of ID at that time or the purchaser drive to the ISPs offices and show proof of ID there. For these reasons, reasons cited throughout the complaint, and for reasons that will be prevented at trial, the equities balance in my favor completely. Accordingly, a preliminary injunction must issue. The Court should in no way respect the Defendants and their co-conspirators contempt for humanity and the laws of the United States.

C. IRREPARABLE HARM

<https://www.youtube.com/watch?v=aVXmzZdRcNE>

68. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The irreparable harm factor is where thing get a bit messy. Without the filter, I remain in a state of irreparable harm for several reasons.

69. First, I am continually subject to relapse. Pornography is one click away. The tactics of the predatory pornographers do not cease. My attraction and love of the opposite sex is a potent force built within me that subjects me to malicious exploitation as the result of the deliberate lack of safeguards.

70. Second, the District Attorney's office in Nashville is completely out to get me for being a whistleblower. To be fair, the District Attorney's office has been maliciously poisoned by the relentless scheming of John Rich's civil attorney, Cyndi Sherwood. If the BPR would target her instead of me, then I would not likely have to accuse the District Attorney's office of so much unethical misconduct. Also, to be fair, the atmosphere of the District Attorney's office is subject to change with replacement of a prior immoral one, DA Johnson, with newly elected one, who is honorable. But as it stands at the time of this filing to say that Assistant District Attorneys, like ADA Meed, are stalking me is an understatement. This ADA is being bullied to do the will of

Sherwood and Rich, and it would be great if she would shut them down, and stop allowing her office to be abuse in the same way that the BPR under Nancy Jones did. I've threatened Governor Haslam through the Courts relentlessly to do something, but his office pretty much told me that I needed to sue the responsible District Attorney. As a former prosecutor, I cannot bring myself to do that, but Mrs. Sherwood is a different story. Yet, under Torrence Johnson's regime, the DA's office has gone so far as to literally invent crimes to accuse me of committing in order to extract payback for having sued Nancy Jones, Krisann Hodges, ADA Sexton, ADA Welch, ADA Jackson, and Neal & Harwell, in matters relating to unknown community bully, tireless scoundrel, and F list Celebrity, John Rich involving corruption that admitted looks like childs play compared to what is taking place in this case by the Enterprise but the targeting is relevant nevertheless. The Nashville District Attorney's office under Johnson, like several others in the country, are in the business of inventing crimes against people it deems to be enemies of the state. This is the same kind of prideful spirit that surfaces in the Tech companies refusal to filter. This is a result of an acute actual checks and balances over the District Attorney's office and the Board of Professional Responsibility. Where is the ACLU on that matter? No where to be found.¹²² To demonstrate who is really producing and quarterbacking the John Rich stalking litigation through the criminal courts, Mrs. Sherwood attends every single hearing. Not only that she often sits with the state Court's staff or at the table with the prosecutors. To really drive home the fact that she is in charge of the harassment circus, she often interjects in proceedings and addresses the Court. The Court, the Courts staff, and the ADA allow this total abuse of combining criminal courts with civil courts. The message to me is that the criminal courts can be

¹²² Instead of targeting Christian groups and Judges who aptly want to display, the ACLU should fiercely focus on prosecutors and BPR officials, who abuse the power of their office in order to keep them fair and honest.

used as an instrument of the rich to victimize civil litigants whose life ambition is not the accumulation of wealth and accolades. What is even more miraculous is that the state expects me just to absorb blow after blow as if victimization for the use of the federal civil courts by criminal state courts¹²³ is routine business.

71. The District Attorney's office knows that there is not a lot of accountability over it and that it has far too much power.¹²⁴ In January 2014, one of DA Johnson's assistants threatened me, after a hearing before General Sessions Judge, to have me charged for possible accessing illegal pornography, as could be inferred from filing this lawsuit, once I was inevitably acquitted of the phony Rich and 17 year old girl stalking charges that the D.A.'s office simply invented with Mrs. Sherwood and Mrs. Rogers as a form of vindictive payback in light of my demand before the District and state Courts that they at least pretend or attempt to be honest. The ADA's threat was issued as part of a continuing agenda to extort me into taking some kind of plea so that the Johnson's District Attorney's office could save face after knowingly bring false charges to

¹²³ For the record, the State Court Judge presiding over the Rich stalking case is by far the most honorable and capable justice in Davidson County. In normal proceedings, he is both fair and kind. Yet, in the fake case floated against me, he has completely failed to see how Sherwood has misused his Court and staff to pervert civil litigation. He should not be trying me; he should be trying Sherwood for false reporting. The state court's lack of perception amounts to victimization entitlement that is completely intolerable and warrants immediate reporting. The Judge in that case swore me in as a Court officer in 2007, and then in this grossly false stalking action, he miraculously expects me to lay down and not to honor the very Constitutional Oath that he administered. It is utterly outrageous; and I expect better from this Justice in particular. I think that the Courts actions amounts grounds to require all justices to have prior military service so that oaths are not treated in a flimsy manner. I should not be placed in a position where I am forced to report Judges for violating the petition and access clause. In the Courts defense, the Judge should not be put in a position where one of his Court officers is on trial. It makes me wonder if the takeaway is that I should apologize for having gone to law school and believe in the sanctity of the rule of law. No such apology will be offered. Instead, I will strictly enforce every single solitary law in keeping with the very oath that the Court administered. If that Court cannot understand why I am not happy about being victimized unjustifiably, then the courts understanding in all things is entirely questionable. There is no doubt that I am advocate of Judges, but he cannot allow his court to be used in the manner in which it has. It reduced the Court and its staff to a perpetrator of injustice.

¹²⁴ Mandatory minimum sentencing caps must be eliminated. The criminal justice system is way too powerful and dysfunctional. The United States is supposed to have a Mercy-centric system, not a vicious victimizing one, where wealth and position in life is dominating.

promote leverage in an existing civil case before the Honorable Senior Judge Harris and to get personal payback for my accusations of corruption against several Assistant District Attorneys. See 10C4568; John Rich v. Chris Sevier in the 2nd Circuit in Davidson County. Johnson's ADA threat to investigate regarding pornography violations followed minutes after I had accused her of "being an witless scoundrel who was serving as a puppet for a delusional F list celebrity and who amounted to a disgrace to the prosecution profession" in open Court before a very entertained packed courtroom, which my pals in the media were present. Apparently, the fact that I am fighting sex trafficking and child pornography apparently has no impact on the District Attorney's office desire to establish its out of control egoism and propensity to politically target those whom it deems to be adversaries of the state in the preservation of a "good ole boy network" that smells of corrupt enterprise that is being tried here.¹²⁵ If the Defendants had sold me their products with preset filters, the threat of prosecution as an extortionistic political tool in the area of pornography would be removed from the desperate District Attorney's office toolbox of immoral tactics.¹²⁶ The Defendant's greed has exposed me to criminal liability by political adversaries, not because I recommend to the misguided Celebrity Apprentice victor that he drop his frivolous \$20,000,000 lawsuit against me.¹²⁷ The threat of criminal prosecution constitutes

¹²⁵ Now that Glenn Funk is the District Attorney, I predict that the targeting will end, but it is not certain. It is my impression that he is an honorable man. But it is not certain given the polluted carry over from the lawless regimes of the past.

¹²⁶ In November 2014, my former civil litigant, Assistant District Attorney Antoinette Welch, charged Michael Kohlmeyer for sex trafficking, after having a conversation exchange through online chat. Mr. Kohlmeyer faces from 15 to 60 years in prison for acts that does not even remotely amount to sex trafficking. There is no doubt that my former civil litigant means well. But the District Attorney's office is too powerful, too corrupt, and too untrustworthy to be viewed carelessly.

¹²⁷ If the BPR would hold Sherwood accountable, it would be best for the Nashville Bar.

irreparable harm for purposes of this case. If the Defendants had honored the law and sold their products with filters, I would not be in this position. Accordingly, immoral state Assistant District Attorneys would not be able to readily threaten to bringing false charges relating to pornography that the Defendants unlawfully distribute without any choice involved by the consumer. As it stands, I and others stand in a position of irreparable harm.¹²⁸ The DA's office can use the phony criminal charges to gain leverage in a civil case regarding pornography. COPA and the CDA were struck down because they could have lead to increased prosecutions relating to pornography. However, here in the instant case to not make the ISPs and Device Makers sell their products with filters, also unduly exposes the public to criminal prosecution. The circumstance is grossly unjust. There is no doubt the Mrs. Sherwood has been pushing the ADAs would were present under Johnson's reign of terror to have me falsely investigated with every pornography violation imaginable.

¹²⁸ This Court knows first hand that I have been involved with litigation against F list celebrity John Rich. Rich can be proud that my litigation with him comes a close second to my efforts to clamp down on the sex trafficking epidemic. Rich falsely accused me of stalking because I sent him an email in 2013, encouraging him to spend time elsewhere besides litigating against me. This request came after I had naturally made him waste well over a million dollars in litigation expenses. Two girls who I do not know, Nila Frederick and Justus Dobson, read about this litigation. They then had the apprehension in there mind that I must be a pervert, even though I am fighting to put a dent in perversion. This detail was apparently missed by the two opportunist. These girls apparently saw me at Bongo Java and Ben and Jerry's Ice cream shop on the same day. They assumed that I must be stalking them, even though my bank records demonstrate that I go to coffee and ice cream shop in the past on days when they are not there. Desperate to make John Rich's charge seem more credible. On of District Attorney Johnson's ADAs squeezed the two girls report into a new felony stalking charge. In December 2013, Mrs. Dobson and her father called the Court and said that I was lying in wait outside of her high school. Fortunately, the GPS a fixed to my person demonstrated that I had never been their highs chool and the report that was made was entirely false. Additionally, in January 2014, Mrs. Fredericksen posted on my facebook page, regardless of a no contact order, which tends to substantiate the position that these opportunistic females are stalking me and not the reverse. But the true kicker came in January 2014 at a hearing before Judge Moreland, there Mrs. Fredericksen took the stand and admitted that before reporting, she had read all about this case and it influenced her decision to file a stalking report with the police. If the Defendants' Enterprise did not exist, and they had sold their products with preset filters, then I would not have needed to file this lawsuit. If I had not filed this lawsuit, Mrs. Fredericksen would not have come up with the idea of falsely reporting me for "stalking." Furthermore, what is to stop other actresses from coming out of the wood works and accusing me with the stalking. Accordingly, I am in a state of irreparable harm. If the Court would issue the preliminary injunction, then others with the same malicious mindframe as Mrs. Fredericksen and Mrs. Dobson may be less inclined to file phony police reports.

72. As if the above consideration was not bad enough, there is another factor relating to irreparable harm that associates with a terminations of rights in Domestic Court in Tennessee before the Senior Judge Ash. See 14A31. In April 2014, through attorney Helen Rogers, who received her law degree from the YMCA school of law, filed a petition to have my parental rights to my only son, John Sevier, terminated.¹²⁹ In the petition for termination, the Petitioner asserts that my parental rights should be terminated because of a statement I made in an email in September 2010, which read, *“you can have 100 percent exclusive custody in perpetuity because the way I feel about it is that if I am not given permission to love you, I cannot permit myself to love the child...”* Clearly, this statement is direct proof of the lack of the inability to keep and maintain meaningful bonds as a result of exposure to hardcore pornography on the Defendants’ products which depleted oxytocin levels. In the Petition for termination and at telephonic hearings, Mrs. Rogers argued on behalf of the absentee Petitioner that I deserve to have my rights terminated because I admit to having been exposed to pornography on filterless devices, in part due to Comcast’s refusal to allow customers to opt-in to being exposed to pornography. Because I admitted in 3:13-cv-0607 to having a porn addiction for no fault of my own, Mrs. Rogers has floated a Petition for termination. The threat of having my parental rights terminated as a result of exposure to pornography in a scenario where I wasn’t given a choice in the matter establishes a status of irreparable harm for myself and other parents who find themselves in similar termination proceedings. If ISPs were required to make adults opt-in, it could serve to impact domestic proceedings that would likely yield better results for children. Given the overwhelming evidence of the presence of irreparable harm, the Defendants’ and their co-

¹²⁹ Mrs. Rogers proves why the YMCA law school must be closed down.

conspirators must be enjoined. There are other inferrable reasons for irreparable harm that should compel the Court to issue the injunction that I will set forth in the motion for an injunction.

D. LIKELIHOOD OF SUCCESS ON THE MERITS

For the weapons of our warfare are not of the flesh but have divine power to destroy strongholds. 2 Corinthians 10:4

73. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. I am not sure how anyone could question likelihood of success on the merits with a straight face after reading this complaint, exhibits, and declarations, given the overwhelming evidence of the Defendants and their co-conspirators malicious conduct. If the ISPs in the UK can provide filters so can the ISPs in the United States. Are the Brits more concerned about human rights and the defense of children than we are? Only a proponent of fraud would believe that the ISPs could succeed in this action in light of so much evidence of wrongdoing. The Defendants are boxing themselves by their own arguments and irrational responses to this litigation. The Defendants are inescapably guilty of fraudulent concealment, negligent failure to warn, negligent failure to test, and strict liability.¹³⁰ Probably the most straightforward violations perpetrated by the Defendants is the fact that they sold their products without filters and placed an unfair obligation on the purchaser to seek out third party filters in order to make the Defendants' products safe to use.¹³¹ The burden to filter rest solely on

¹³⁰ Adhered to their common scheme of deception and falsehood in lawsuits, including, among other things, destroying and concealing documents, scapegoating the internet, blaming the consumer for their own injuries that would not have come about "but for" the use of their dangerous products, and using shame to keep whistle blowers silent. Nearly all of the Defendants responses in this action have amounted to a grossly dehumanizing personal attack on myself in hopes that they can shame me into backing down.

¹³¹ Creating the imposition of the purchaser to have to seek out third party filtering companies who lack privity to the original sale is itself an injury, an undue burden, and a manifest material breach of duty by the device makers. The onus should be on the device makers to sell their products with activated, custom made, preset filters, that make an reasonable attempt to block pornography.

the Defendants. It is not the duty of the purchaser to make the Defendants' products conform with obscenity laws. For all of the reasons set forth in this complaint, the Court will see that the merits will resolve in my favor in the same way it did with the Auto and Tobacco Companies conspired. The section 230 of the CDC defense is without merit.¹³² The CDC is relevantly in so far as Congress amended the federal obscenity laws in the 1996 CDA to criminalize distribution of obscene content on the Internet. The Defendants and their co-conspirators are lucky that they are not jailed for their crimes in criminal court, but here in civil Court, the the likelihood of success prong resolves in my favor like the rest.

IV. FRAMING THE FACT THAT PORNOGRAPHY ADDICTION IS REAL

<https://www.youtube.com/watch?v=3UcTcd0efVs>

"This could be heaven or this could be hell....we stable it with our steely knives but we just can't kill the beast....the last thing I remember I was running for the door I had to get back to the place that I was before. Relax said the night man, we are programed to received, you can check out any time you like but you can never leave." The Eagles, Hotel California.

74. The ISPs and Device Makers must both be required to provide filters on their products that can be opted out of if the purchaser is over 18 because like with gambling, nicotine, and so forth, pornography addiction is real.

75. Porn Addiction Generally:¹³³ My Defendants in *Apple* 3:13-cv-0607 and in *Google* 3:14-cv-1313 love to pretend that my position that pornography is addiction a position that I single

¹³² Section 230 of the communication decency act does not protect the Defendants products. Section 230 of the communication decency act is unconstitutional because it violates the due process rights of consumers under the 5th Amendment of the United States constitution and allows for an lawful taking through state action in the form of a shield-like- statute that is subversive to justice to protect special interest groups. To bring about internet zoning to hold ISP's accountable, the Constitutionality of section 230 will be challenged by the Plaintiff.

¹³³ The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

handedly invented. So, this matter should be addressed in the complaint to sufficiently support the claims. "Addiction represents a pathological, yet powerful, form of learning and memory."¹³⁴ "The same part of the brain lights up with cocaine, heroine, and pornography light up."¹³⁵ "At its core, addiction isn't just a social problem a moral problem, or a criminal problem. It's a brain problem whose behaviors manifest in all those other area. It's about underlying neurology, not outward actions[.] Addiction is a chronic disease of the brain affecting the reward/motivations/memory systems. Addiction includes food, sex and gambling. In other words, sexual addiction, including pornography addiction is a chronic disease of the brain affecting reward, motivation, and memory."¹³⁶ Natural or process addiction can include sexuality, food, and gambling, whereas Drug addiction involves cocaine, methamphetamine, and opioids. Addiction also affects neurotransmission and interactions between [memory] circuits and brain reward structures, such that the memory of previous exposures to rewards (such as food, sex, alcohol and other drugs) leads to a biological and behavioral response to external cues, in turn trigger craving and/or engagement in addictive behavior."¹³⁷

¹³⁴ Dr. Kaurer Malenka. "Synaptic plasticity and addiction." Socio-effective neuroscience and psychology. "

¹³⁵ Doctor Valery Voon's study at Cambridge, brain study of porn addiction is extremely persuasive. <http://yourbrainonporn.com/cambridge-university-brain-scans-find-porn-addiction>
<http://www.socioaffectiveneuroscipsychol.net/index.php/snp/article/view/20767/29179>

¹³⁶ Michael Miller, MD. ASAM. American Society Addiction Medicine. The American Society Addiction Medicine is a biology based group and does not suffer from confirmation bias due to monetary incentives. Like the Courts, ASAM can afford to major in the truth.

¹³⁷ "Growing evidence indicates that the VTA-NAc pathway and the other part, the acute positive emotional effects of natural rewards, such as food, sex, and social interactions. These are the same regions have also been implicated in the so-called "natural addictions" (that is, compulsive consumption of natural reward) such as pathological overeating, pathological gambling and sexual addictions." Nestler EJ "Is there a common molecular pathway for addiction?" Nature Neuroscience 9(11): 1445-9, Nov 2005.

76. In my case, and in the case of millions of others, in dealing with the pornography distributed at unlawfully by the Device Makers and ISPs, harder content becomes needed because of a downgraded dopamine system. Addicts have fewer dopamine receptors, and less dopaminergic input from the ventral tegmental area due to an over use of a natural or process reward. The brain literally changes to crave pleasure. New normal means harder content. The addict needs something else to kick the brain back up to speed. This creates a decreased frontal response, with an increased salience/craving and it provides the drive to use.¹³⁸ (I experienced such things thanks to the Enterprise at play and the lack of regulation.) It is totally devastating to one's life and their personal goals as a progress is repeated due to a subversive hijacking beyond one's personal control.

This case is exciting insofar as we are going to cover some great science, which unsurprisingly backs the New Testament squarely. This case will be reduced to the politics of medicine.

Americans are "fed up" with being lied to in the areas of food and sex. (See the Documentary Fed Up). In this case I will invite honorable Neurologist and Doctors to discuss (1)

Dopamine¹³⁹, (2) Dopamine Receptors, (3) Delta Fosb,¹⁴⁰ (4) molecular switches, (5) DNA

¹³⁸ This is why sex within the confines of marriage should be championed. It is scientifically healthy.

¹³⁹ Marc Lewis, who was addicted to just about everything, wrote a book about it when he became a neurologist. Regarding dopamine, he said: "Good old dopamine, the chemical move that gets us to chase after whatever it is we want, whatever spells relief. For starving animals, dopamine makes the brain a vehicle for seeking food, for addicts, it sends the brain hunting for drugs. In fact, dopamine-powered desperation can change the brain forever, because its message of intense wanting narrows the field of synaptic change, focusing it like a powerful microscope on one particular reward. Whether in the service of food or heroin, love or gambling, dopamine forms a rut, a line of footprints in the neural flesh. And those foot prints harden and become indelible, beating an intractable path to a highly specialized - and limited - pot of gold." "Memoirs of an Addicted Brain: A Neuroscientist Examines His Former Life on Drugs. Public Affairs, New York, 2011 pg 156.

¹⁴⁰ In looking at dendrites new wires are formed as the addiction hardens. Delta Fosb is one of the most powerful molecular switches. Delta Fosb is an important concept for this case that will be explained at trial by neurologist. The way DNA is expressed becomes an addictive transcript.

transcripts,¹⁴¹ (6) Mirror Cells,¹⁴² (7) super normal stimulus,¹⁴³ (8) Nucleus synapse, (9) pheromones, and (10) other neurotransmitters. Further, we will also see that our brains change as we learn.¹⁴⁴ "The brain is the source of behavior, but in turn it is modified by the behaviors it produces...learning sculpts the brain structure." Zatorre et. al. Nature Neuroscience 2012. Also, We will discover that pornography addiction, like drug addiction, shrinks the brain.¹⁴⁵ Brain Shrinkage is the true legacy of the Defendants filterless devices. Pornography is causative, it is not correlative. Every study of the brain regarding addiction shows shrinkage. Atrophy seen in reward-associated pathways in both natural (process) addictions and drug addiction.¹⁴⁶

¹⁴¹ The same DNA strands that turn on with salt cravings turn on with DNA stands with cocaine and sex. Drugs and pornography usurp natural pathways and natural reward systems. Drugs and pornography hijack and rewires the brain adversely.

¹⁴² Lets consider Mirror Cells. In Mouras et. al. Neuroimage, 2008 study, Doctors looked at the mirror image cells of persons watching the kinds of erotic films that the Defendants distribute. They found: "We suggest that...mirror-neuron system prompts the observers to resonate with the motivational state of other individuals appearing in visual depictions of sexual interactions." The viewer was resonating. Literally projected into the film.

¹⁴³ Breast Augmentation female genital surgery - super normal stimulus - our western version of female mutilation. It is part of the sexualization of women. Plastic Surgeon specializing in cosmetic labiaplasty, as quoted in the New York Times, Fashion & Style, The Most Private Makeovers "Now women shave...Now they see porn. Now they're more aware of appearance."

¹⁴⁴ Elbert et. al. Science 1995 - Increased use of the left hand in string players increases the corresponding cortical grey matter representing the fingers of the players; this finding is increased with earlier onset of training.

Sckwenkreis et al. Eur J NeurSic 2007: "cortical asymmetries are the result of use-dependent plasticity as a specific consequence of extensive musical practice."

Draganski et al. gray matter increased in medical students after a 3 month period of intense studying in both the hippocampus and the parental lobes.

¹⁴⁵ "Gray matter volumes of [multiple brain areas] were significantly correlated with the duration of Internet Addiction in the adolescents with Internet Addiction disorder. Our results suggested that long-term Internet addiction would result in brain structural alterations, which probably contributed to chronic dysfunction in subjects with Internet Addiction Disorder." Yuan K. Quin. W Wang, Zeng F., Zhao L, et al. (2011) Microstructure Abnormalities in Adolescents with Internet Addiction Disorder. PloS One 6(6): e20708. doi: 10.1371/journal .0020708.

¹⁴⁶ Here are studies dealing with brain shrinkage. Cocaine (Franklin, 2002 Biol Psych); Methamphetamine (Thompson, 2004) J Neurosci); Opiates (Lyo, 2005 Psychopharmacology); Obesity (Pannaccuilli, 2006 Neuroimage); sexuality (Schiffer, 2007 J Psych Research); Internet Addiction (Zhou, 2011 Eur J Rad)

The Truth vs. The Lie:

<https://www.youtube.com/watch?v=qBtgA0ZLWo0>

77. The medical profession, the United States, and the Defendants are fully aware that pornography addiction is real. It has already been proven that pornography addiction is real if you understand the evidence. The real question is not whether or not the ISPs and Device Makers are distributing pornography that is addictive or not. The question is whether we want to confront the truth? The Defendants do not want to do so because it's bad for business. But why are we as a people allowing them to push us around. Pornography can become an addiction in the brain changing sense of the word, like heroin or cocaine addiction. The press loves to publish anything that says "pornography is great" because sex sells, and the press largely is dastardly atheistic due to some emotional problem with Christianity. The apologetics in academic sexology is appalling.¹⁴⁷ I look forward to tearing apart quacks on the stand. Sexologists are paid to be biased and are operating in a dishonest fantasy land. They advance a large lucrative system that is backed by the Enterprise here, just like the doctors for the Tobacco industry. I'm sure that the ISPs will go crawl in bed in with the sexologist in this case in trying to advance their agenda. But what they will likely accomplish is the impeachment of the entire sexologist field in light of the insurmountable evidence. America has sex fatigue, as sex is losing its specialness. Kim

¹⁴⁷ The DSM, the diagnostic statistical manual, doesn't claim to describe etiology or biology, only behavior. The DSM said that gambling was addictive, but did not include pornography. The DSM says nothing about the biological underpinnings of mental disorders. The DSM has said emphatically that it is going to stay out of the biology field. But bullies like Apple advance the DSM's superiority for the same reason they advance the false narrative of parental controls because it advances their greedy agenda. There are still Doctors today who say nicotine is not addictive. That is because it apparently pays to lie to one's fellow man. For any quack doctor who would say that pornography is not addictive. I would point them to General Washington on this death bed. He had a throat infection and fever so his doctors bled him. They removed half the blood that was in his body and he died. They bled him to death on a false theory that by bleeding him out, his fever would be reduced. If you get the hot out the fever leave. General Washington was bled to death by his doctors. Those are the same kind of doctors who today would say that porn is good for you. Sexologists who say porn is good for you are no different than the Ear Nose and Throat Doctors who said that "smoking was good for you."

Kardashian latest photo shoot for paper magazine. "I'm bringing sexy back," by pushing pornography underground if the Court will allow it.¹⁴⁸

78. We humans have emotions. We have emotional assess. Emotional access is the basis for much of our tort law - outrageous conduct, invasion of privacy, false imprisonment, attempted murder. The Courts have recognized the reality of emotional damage that since the inception of our Nation. In fact, we can sue in civil court for negligent and intentional infliction of emotional distress, as I have pled here for good cause. The pornography that the Defendants and their co-conspirators distribute violate our emotional access and so requiring that they provide filters should be a "no brainer" from the Court's perspective as the public's interest is considered.

79. Pornography is not just about what it harms but what we lose. Waller Newell, Ph.D said "The best way of convincing young men to treat women with respect is to educate them in those traditional virtues of character that make it a disgrace to treat anyone basely, dishonestly, or exploitatively. Moreover, the surest way of raising young men to treat young women as friends rather than as objects for sexual exploitation is to appeal to their natural longing to be honored and esteemed by the young women who they are attracted."

80. We are not here to lie to one another, make the world a worse place and die. That is what Dr. Kinsey and Hilter did. What is the upside to that? Dr. Kinsey, who the Defendants side with advanced "outlet" sex. The idea that "sex is all about organism and not about a person." But to quote Dr. Hilton *"We are designed to bond, feel, and connect. It is not Kinsey's hook up. We are*

¹⁴⁸ Justin Timberlake FutureSex/LoveSounds (2006) vs. <https://soundcloud.com/ghostwars/straight-up>. It is a fact that in summer of 2014, this track was positioned to be a on compilation with Timberlake so I've earned the right to make fun of a fellow Tennessean.

better than that.” We are not just animals. We are spiritual beings.¹⁴⁹ As Cicero, On Friendship, stated: “*Yet more, if emotion be eliminated, what difference is there, I say not between a man and a brute, but between a man and a rock, or the trunk of a tree, or any inanimate object?*” Or consider William Shakespeare Hamlet, Act 3, Scene 4, “*Refrain tonight, and that shall lend a hand of easiness to the next abstinence; the next more easy; for use almost can change the stamp of nature.....*”. The pornography that the Defendants distribute leaves a stamp on the brain. It is time that the Enterprise at play here be stamped out by the Courts by hardcore responsiveness to such outrageous evil. The Pornography that the Defendants and their co-conspirators distribute is addicting. They have failed to warn, fraudulently concealed, failed to protect, and engaged in racketeering as the paramount piece in a criminal enterprise.

¹⁴⁹ Regardless of one’s personal belief, it is almost frightening how applicable this is in describing America currently: Romans 1:22-32. Although they claimed to be wise, they became fools 23 and exchanged the glory of the immortal God for images made to look like mortal man and birds and animals and reptiles. 24 Therefore God gave them over in the sinful desires of their hearts to sexual impurity for the degrading of their bodies with one another. 25 They exchanged the truth of God for a lie, and worshiped and served created things rather than the Creator--who is forever praised. Amen. 26 Because of this, God gave them over to shameful lusts. Even their women exchanged natural relations for unnatural ones. 27 In the same way the men also abandoned natural relations with women and were inflamed with lust for one another. Men committed indecent acts with other men, and received in themselves the due penalty for their perversion. 28 Furthermore, since they did not think it worthwhile to retain the knowledge of God, he gave them over to a depraved mind, to do what ought not to be done. 29 They have become filled with every kind of wickedness, evil, greed and depravity. They are full of envy, murder, strife, deceit and malice. They are gossips, 30 slanderers, God-haters, insolent, arrogant and boastful; they invent ways of doing evil; they disobey their parents; 31 they are senseless, faithless, heartless, ruthless. 32 Although they know God's righteous decree that those who do such things deserve death, they not only continue to do these very things but also approve of those who practice them. Although they claimed to be wise, they became fools 23 and exchanged the glory of the immortal God for images made to look like mortal man and birds and animals and reptiles. 24 Therefore God gave them over in the sinful desires of their hearts to sexual impurity for the degrading of their bodies with one another. 25 They exchanged the truth of God for a lie, and worshiped and served created things rather than the Creator--who is forever praised. Amen. 26 Because of this, God gave them over to shameful lusts. Even their women exchanged natural relations for unnatural ones. 27 In the same way the men also abandoned natural relations with women and were inflamed with lust for one another. Men committed indecent acts with other men, and received in themselves the due penalty for their perversion. 28 Furthermore, since they did not think it worthwhile to retain the knowledge of God, he gave them over to a depraved mind, to do what ought not to be done. 29 They have become filled with every kind of wickedness, evil, greed and depravity. They are full of envy, murder, strife, deceit and malice. They are gossips, 30 slanderers, God-haters, insolent, arrogant and boastful; they invent ways of doing evil; they disobey their parents; 31 they are senseless, faithless, heartless, ruthless. 32 Although they know God's righteous decree that those who do such things deserve death, they not only continue to do these very things but also approve of those who practice them.

82. Simple Negligence Might Be The Most Important Cause Of Action: I am going to make this clear right out of the gate. One thing that I want the court to decide is whether under the conditions the Device Makers shifting the onus onto the buyer is “itself an injury” under simple negligence. Given the addictiveness, affordability, aggressiveness, anonymity, accessibility, and abundance, I think the law says that it is. To require the purchaser to install filters in order to make the Defendants' products safe is itself an injury, an undue burden, and evidence of breach of duty on behalf of the seller. To say that no censorship is freedom is too simplistic. No matter what there is a censoring taking place.

V. FRAMING PRODUCTS LIABILITY

“Shut your eyes Marion don’t look at it. No matter what happens.” Indiana Jones Raiders Of The Lost Ark https://www.youtube.com/watch?v=ND_yAPJsef

83. Because the technology is so complex and the ISPs have done such an outstanding job with the Device Makers misframing the matter that for the sake of the Courts, defense counsels, the public, and myself, I feel the need to specifically plead some of the elements of products liability, racketeering, and fraud. My Defendants in 3:13-cv-0607 and 3:14-cv-1313 have mounted a huge effort to suggest the these causes cannot rest against the Defendants. They are incorrect.

Cigarette Vending Machines

84. In terms of strict liability, *Greene v. Brown & Williamson Tobacco Corp.*, 72 F. Supp. 2d 882, 893 (W.D. Tenn. 1999) we learned that distributors are liable for the harm caused by the content they distribute. In *Greene*, cigarette vending machine owners were liable under strict

liability for damaging content found within their machine.¹⁵⁰ The same legal principles apply here. The Device Makers are liable for the damage caused by the illegal content that they distribute. Furthermore, venders of cigarette machines must sell their machines to retailers who will ensure that minors do not access their products.¹⁵¹ The same is true with the Defendants and their co-conspirators, whose products are like a porn vending machine that involves content that, like Tobacco Products, can only legally be legitimately accessed by persons over the age of 18.

85. Device Makers Products Amount To An Electronic Playboy Magazine: Beside Tobacco

vending machines, it could also be accurately stated that the Device Makers products are like an electronic version of an adult “girlie magazine” itself. The device itself constitutes bookends, with some legal material and some illegal content within. The front and back of the device itself

¹⁵⁰ In *Richardson v. Phillip Morris Inc.*, 950 F. Supp. 700 (D. Md. 1997), a tobacco case involving distributors, the Court held that a distributor of product may be held liable to ultimate consumer in strict products liability if product was in defective condition at time that it left possession or control of seller, it was unreasonably dangerous to user or consumer, defect was cause of injuries, and product was expected to and did reach consumer without substantial change in its condition. Restatement (Second) of Torts § 402A. Under § 402A of the Restatement (Second) of Torts (1965), which has been applied by the courts, a distributor may be liable to the ultimate consumer if four elements are shown: “(1) the product was in a defective condition at the time that it left the possession or control of the seller, (2) that it was unreasonably dangerous to the user or consumer, (3) that the defect was a cause of the injuries, and (4) that the product was expected to and did reach the consumer without substantial change in its condition.” *Phipps v. General Motors Corp.*, 278 Md. 337, 344, 363 A.2d 955, 958 (1976); see also *Owens-Illinois v. Zenobia*, 325 Md. 420, 441, 601 A.2d 633, 643 (1992).

¹⁵¹ Tenn. Code Ann. § 39-17-1507 ((a) It is unlawful for any person to sell tobacco products through a vending machine unless the vending machine is located in any of the following locations:(1) In areas of factories, businesses, offices, or other places that are not open to the public;(2) In places that are open to the public but to which persons under eighteen (18) years of age are denied access;(3) In places where alcoholic beverages are sold for consumption on the premises, but only if the vending machine is under the continuous supervision of the owner or lessee of the premises or an employee of the owner or lessee of the premises, and is inaccessible to the public when the establishment is closed; and (4) In other places, but only if the machine is under the continuous supervision of the owner or lessee of the premises or an employee of the owner or lessee of the premises, or the machine can be operated only by the use of a token purchased from the owner or lessee of the premises or an employee of the owner or lessee of the premises prior to each purchase, and is inaccessible to the public when the establishment is closed. (b) In any place where supervision of a vending machine, or operation by token is required by this section, the person responsible for that supervision or the sale of the token shall demand proof of age from a prospective purchaser if an ordinary person would conclude on the basis of appearance that the prospective purchaser may be under twenty-seven (27) years of age.). I'll let the Court deduce the analogous parallels extended by this statute.

amount to “bookends,” like the front and back of a playboy magazine. Inside of the device is a bundle of content, some of which is legitimate (like the sports articles which are also found in playboy) and some of which is not, like simulated rape porn of barely legal teens, who are dressed to look like children. But the ISPs are playing a role in the distribution of pornography onto filterless devices. Both the ISPs and the Device Makers are acting in partnership in violating obscenity laws. The Device Makers products should never reach the hands of children nor adults in their current condition according to the existing Federal and State laws. The products cannot leave the retail store or the manufacturing plant in their current condition.¹⁵² With both the Device Makers and ISPs being required to sell their products with preset filters that block pornography. These filters will reinforce and back one another up.¹⁵³ Accordingly children will be protected and adults who do not want to be exposed to pornography will be protected.

86. The Internet Is Merely Part Of A Sum That Is the Device The ISP and the Device work together like wheel and axle. They are both guilty. The internet is not a cube in the desert that glows. The internet is a part of a sum. The ISPs sell physical boxes with tangible routers that are part of the distribution network at delivering obscenity onto Device Maker’s products for consumption. The Device Makers and the ISPS are both part of a money making scheme and profit off one another in knowingly distributing obscenity and infringed upon copyrighted works.

¹⁵² In a grossly exploitative fashion, the device makers have taken something that is an amazing gift from God - "sex" - out of context and perverted in a manner that exploits consumer biological makeup adversely and hijacks oxytocin to the point of destroying our Nation’s most precious asset - "families and children." Human beings were simply not made to view pornography in the same way we were not designed to ingest cyanide. Porn removes the intimacy factor from sex and has internalized consequences to the essence of a human that are horrific in a myriad of ways. For the Government to allow the status quo to continue to persist and spiral out of control is an immense act of cruelty towards its own people. The Tech companies have bullied society into an environment where pornography is no longer underground by above the surface through “blaming parents” and false first amendment claims.. Obscenity on electron devices must be sent back to the dark abyss where it belongs for the betterment of humanity.

¹⁵³ “A few of the most enterprising and disobedient young persons”ambitions to skirt the filters I propose does not negate the legitimacy or need. *Fabulous Associates, Inc. v. Pennsylvania Public Utility Commission*, 896 F.2d 780, 785 (3d Cir.1990).

The sum total is the devices sold and created by the Defendants. Without a device that powers on and off, there is no internet. (See the movie Don Jon). The internet's very existence is dependent on the device being turned on and the ISP box being plugged into the wall and turned on. The exclusive ability to access the content on the internet is an essential selling point for the Defendants. Both the Device Makers and ISPs have the ability to block pornography. That's two chances to get it right. Instead of working together to distribute child porn and obscenity that violates the community standards, the Device Makers and ISPs can jointly work to have a reinforcing filter system. They can help each other comply with the law instead of breaking it for a change. Accordingly, the Defendants have a duty to account for the content they are distributing, just like all other manufacturers in the analog world, who are not any less responsible for the content they distribute. It is the duty of the Defendants, and their duty alone, to make sure their products are sold in a manner that is lawful and safe. The Defendants have a civil and criminal obligation to not violate obscenity laws.

87. False Apprehension Of Safety And The Misdirection Embodied In Inept Parental Controls

On Device Maker Products: Like the ability to turn water on and off, the ISPs can zone pornography to the unused ports, as Ralph Yarro at Think Atomic has explained in his declaration. As it stands now, the parental controls sold by the device makers are flaunted as the saving grace when they are not. They are more along the lines of a picture of seat belt than an actual seat belt. The parental controls in their current state mislead the consumer in giving a false sense of safety in the same manner in which they mislead me which caused personal injury. The current deficiency with Parental controls can be found in the fact that there is no "third-party-keeper" of the password, making self-accountability impossible and unrealistic. Even if an

individual consumer is tech savvy enough to create a guest account and track down parental controls that are inconveniently hidden in the "applications" folder, there is not a third party entity to be the password holder. The Device Makers and their co-conspirators purposefully created parental controls that are dysfunctional because they want their customers exposed and addicted to pornography and codefendant on their products for philosophical and monetary reasons. Meanwhile, the ISP's provide no safety features whatsoever. They are scapegoating the parental controls on device makers and hoping no one sues them. It is time that their hope expire so families can have hope once again about the health of their family. For the tech companies to turn on the flow of pornography to a home, they the purchaser must first opt in and show proof of ID. The special treatment of Tech companies must terminate for the benefit of humanity.¹⁵⁴

88. Parental Controls Provide No Safety For the Primary Purchaser: Another serious problem with parental controls on Device Maker products is the fact parental controls provides do not safety mechanism for the primary purchaser. Apple and their co-conspirators maliciously ignore that fact. From a legal and common sense standpoint, the device makers have no credible grounds for assuming that anyone other than the purchaser will be using the device. And yet, there are no safeguards in place for the purchaser at all, when there could be. The parental controls theory assumes that the primary purchase can have self-control in the face of the onslaught of attacks by aggressive predatory pornographers, but whoever is on the guest account

¹⁵⁴ This has gone on for long enough. Innate, transcultural justice demands this in keeping with the realities of Americanism that is built on institutional checks and balances and accountability. This accountability is not evidence of cumbersome dogmatic control as the device makers pretend, it is the evidence of a wise Government that is concerned with the health, safety, and welfare of its citizenry, and that understands the difference between right and wrong. The idea of self-accountability is predicated in narcissistic pride that is itself a chief problem with a human race. There is no question, imposing a preliminary injunction would amount to a love letter to the American people, as it would reduce victimization and incarceration. Failure to be responsive in the face of so much fraud, destructive, and lawlessness would amount to an extreme act of cruelty towards consumers - especially children who have been completely left out to dry and targeted. The jury is out: porn harms.

cannot. This rationale amounts to an appeal of arrogant superiority of the primary purchaser and proves to be the same narcissistic reasoning that is the hallmark of the Tech companies, who deserve to be disgorged of assets completely. The enterprise uses pride and shame as a powerful weapon to advance a self-serving agenda. Their own conduct demonstrates that man is a spirit being, not just an animal, that needs protections of the heart. The fact that the Defendants and their co-conspirators sell their dangerous and defective products to non-parents, only to point to parental controls as the saving grace, demonstrates how outrageously flawed their arguments are. In truth, parental controls amount to a possible seat belt of some measure for a person riding in the back of the car. There is no seat belt provided for the driver. Therein lies the problem. And why is this the case? Because like Tobacco Companies, the Device Makers want the user addicted to pornography and codependent on their machinery. But this rape of the American conscience can begin to end with the issuance of an injunction. The ISPs are helping provide the ingredients for the porn cocktail that is polluting our National conscience, and ISPs must be regulated.

89. **FIDUCIARY RELATIONSHIP**: The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. For purposes of products liability tort, there are a set of elements that I must establish in the complaint (1) fiduciary relationship; (2) violation of perfect good faith; (3) breach of duty; (4) instrument of control; (5) outrageousness. There was unquestionably a fiduciary relationship established between myself and the Defendants in satisfaction of this element. I do not have any technical training whatsoever regarding ISPs and their ports. I do not have a computer science degree. I relied on the technical expertise of the Defendants in purchasing products, and they

assured me that their products were safe for use through word and action. The agents at Comcast, who sold me the products held themselves out as having specialized knowledge and training. Their field of work painted the picture of "tech experts" and "specialized knowledge," which effectively caused me to let my guard down, as they intended.¹⁵⁵

90. **VIOLATIONS OF PERFECT GOOD FAITH**: The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. Additionally, the Defendants violated the perfect good faith element of products liability for several reasons. Due to (1) the false assurances, (2) the lack of warning, (3) the technical expertise of the Defendants, (4) lack of preset outed out filters, and (4) the Defendant's partnership with predatory pornographers perfect good faith requirement was grossly violated.¹⁵⁶

91. **FAILED TO OPERATE AS EXPECTED**: The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The Defendants products failed to operate as expected. I did not expect that I could be tricked into encountering such highly addictive computer pornography purposed to overpower my senses, through a deliberate design flaw and partnership with pornography and false marketing campaigns. I did not know that these Defendants, who held themselves out as being

¹⁵⁵ (The products alone scream "technological advancement.") The Defendants are in the best position to sell their products in a safe condition, and I assumed that they would, based on their marketing campaigns, in which they portrayed themselves as proponents of community and family. The Defendants are in the best place to sell their products with filtering systems because they know their own complex products best. The manufacturers pride themselves on making products that are on the cutting edge of technology.

¹⁵⁶ It is no wonder that sex addiction clinics around the country are full and have waiting lists. Additionally, the rise of geriatric porn addiction is dramatically on the rise, which serves to symbolically violations of perfect good faith alone. I don't know anyone in America, other than those inside the circle of greed here, who want their Grandfather stumbling into pornography due to the porn compact, design defect, and aggressive tactics of pornographers. The Defendants are operating at the height of bad faith, but masquerading to have clean hands only to be completely aligned with predatory pornographers at the expense of all of mankind. The elements of a fiduciary relationship and bad faith are both present in this case, and the products sold by the Defendant are in contempt of products liability laws.

law-abiding-proponents of morality, would leave me vulnerable to predatory pornographers, who tactics they capitalize on. I did not know that the computer pornography the Defendants subjected me to was addicting or bad for my marriage and biochemistry. I did not expect to form an unnatural connection with the product and the propulsion of sexual deviance. I did not expect that in using the product, as it was currently designed, that I would be exposed to the disease of addiction and adverse biological alterations. I did not expect that the products would constitute a threat to personal relationships, the manufacturer and retailer told me through word and advertisement that the technology would improve my relationships that matter most, not destroy them. I did not expect the Defendants had an agency relationship with pornographers. I did not know how addicting this brand of pornographic content was or the kinds of impressions that it leaves on the cerebral cortex.¹⁵⁷

92. THE TECH COMPANIES ARE IN BED WITH PREDATORY PORNOGRAPHERS AND EACH OTHER.

The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. Upon information and belief, the Defendants have an implied and direct partnership with predatory pornographers. Given the Coolidge effect, the manufacturers stand to be the primary beneficiaries of the predatory pornographers tactics due to the refusal of manufacturers and retailers to sell the machines in a safe condition. The Defendants are aware that predatory pornographers employed a litany of techniques that cause customers like myself to interact with pornography by trick only

¹⁵⁷ Yet, every time the Defendants sell one of their filterless smut boxes to a customer, they know that they the customer will be hunted down by predatory pornographers and exposed to obscene content that highjacks the capacity to experience intimacy. They expect this to occur. Their expectations are especially high when it comes to children, hoping they will fall prey to their misdirection tactics. The United States has recognized that there are more important things in life than making money to include following the written state and federal law and the welfare of children. The fact that children are being targeted is completely outrageous and violates the spirit of Americanism. To set the next generation of Americans up for success, I expect the Court to impose the injunction immediately.

to then cause sensory overload. Pornographers intentionally use misleading domain names like watersport.com, boyz.com, and disney princess themes in targeting children and adults alike. Pornographers use mouse trapping and misleading pop ups to target males, only to overpower their ability to resist desirous free samples through a series of enticements and seductive methods that exploit our biology. Meanwhile, both the manufacturers and the executive branch are turning a blind eye to this outrageous conduct because like slavery trade industry of old, the topic is unpleasant and connected with global capitalism and money making considerations under the business judgment rule on the surface. But the fact that pornography is just one click away makes self-accountability arguments unrealistic. Pornography is not a victimless crime. Even after one encounter with pornography, consent to resist can be said to have been eroded and infringed upon.¹⁵⁸

93. ESTABLISHING THAT THE DEFENDANTS' PRODUCTS WERE DEFECTIVE UNDER TENN. CODE ANN. § 29-28-102(2). The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The Defendants sold or allow to be sold a defective product under TENN. CODE ANN. § 29-28-102(2). Given the condition the products were in when they left the plant, the Defendants foresaw my injury. TENN. CODE ANN. § 29-28-102(2), states that a “defective condition is a condition of a product that renders it unsafe for normal or anticipatable handling and consumption.” Given the Defendants' alignment with predatory pornographers and their knowledge about the addictive qualities of the pornography, the Defendants product was grossly

¹⁵⁸ Therein lies the paramount problem. The manner in which the manufactures sell their products erode the users ability to not consent to interacting with obscene content (which breeds illegal activity). Pornography is merely too abundant and too accessible online, and the pornographers are too immoral and aggressive for us to sit around and not do anything about it. Therefore, we owe to each other and to our society to have policies in place that make it harder to access. All of us want community. But our ability to have community will be impaired until we roll back immorality.

defective and amounted to deliver of obscenity. The fact that (1) the Defendants were falsely advertising their products as safe, that (2) the Defendants were aware of how addicting nature of the obscenity they distribute, that (3) the Defendants did not provide warnings, that (4) the Defendants commissioned pornographers to lure me into addiction, that (5) there was a fiduciary relationship based on the Defendants' technical expertise of cutting edge electronics, and that (6) the Defendants products never left their control are just a few of the many factors that cause the Defendants products to be categorically defective for purposes of TENN. CODE ANN. § 29-28-102(2).¹⁵⁹

94. **BREACH OF DUTY ELEMENT**: The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The Defendants have a duty to sell safe products. The purchaser nor third party filter companies have a duty to make the Defendants dangerous products safe. By selling their products in the current fashion, the Defendants violated that duty. The Defendants have a duty not to blame the users for injuries that follow from the normal use of their device in light of the defects. The Defendants breached that duty. The Defendants had a duty to test for the adverse impact of pornography on users. Upon information and belief. The Defendants either failed to accomplish that duty and/or suppressed research. The Defendants have a duty to be straightforward with their customers and

¹⁵⁹ I contend that the Defendants knowingly, intentionally, maliciously, and deliberately sold their products in a defective manner so that I and others would become addicted to pornography and form a sexual bond with their product. The Defendants deliberately knowingly, reckless, intentionally, and foreseeably invited pornographic predators to hunt down, entice, and overwhelm my senses with intoxicating images and videos of graphic sex through unwanted forced encounters with their addicting substances in an onslaught of fraudulent seductive enticements. The true death nail in the coffin of the Defendants under TENN. CODE ANN. § 29-28-102 is that manufacture and retailers are violating obscenity laws by distributing pornography on filterless devices. If anything the executives of the corporations here should feel lucky that they are not being prosecuted

not fraudulently conceal information or misrepresent the effectiveness of parental controls. The Defendants cannot project a family friendly product only to keep their machinery rife with the worlds largest supply of pornography ever imposed upon mankind. This duty was breached in my case. There was never any third party keep of the password to the ineffective parental controls provided. The Defendants breached a duty of care owed by their unwillingness to serve as password protector. The Defendants breached their duty to provide safeguards for myself as the primary user. The parental controls assume that I will be the censoring nanny over an non-existent third party who was not part of the sales transaction, as if consumers, like myself, do not have enough on my plate already. The Defendants breached their duty by putting the onus on me to seek out ways to modify their dangerous and defective product that is rife with dangerous pornography. The Defendants have a duty not to market themselves as "pro-family" only to turn around and expose those same families, who were targeted, to the ruthless pornographers, who threaten the very family relationships marketed to in the first place. The Defendants have a duty not to sell products that are unreasonably intrusive and invade privacy. They breached that duty by participating in cyber stalking their customers. The Defendants have a duty to honor existing display laws and to sell their products with pre-set filters that hold the bank of pornography that lies in wait at bay. That duty was violated. Given the brain science of addiction, the Defendants have a duty not to violate the emotional access of their customers by exposing them to super stimuli that violates the community standard without first acquiring consent, providing warning, and offering in place safety measures. The Defendants breaches were malicious, intentional, fraudulent, and calculated to advance an invalid financial and philosophic agenda.

95. INSTRUMENTALITY WITH THE DEFENDANTS CONTROL ELEMENT

The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. I was injured by products that remained within the instrumentality of the Defendants' control for purposes of *Towle v. Phillips*, 172 S.W.2d 806, 808 (Tenn. 1943) I had no idea that I would be the one burdened to modify their product to make it safe for use. Such an expectation would be as unrealistic as a Tobacco executive expecting that the buyer should have to take the responsibility of removing nicotine from the cigarettes to make it not addictive. Such a contention is absurd and unlawful. The Defendants products are unique because they never really leave their control. Even after I left the store with the devices, they remained in communication with the mothership/manufacture so to speak. The manufacturer and retailers regularly sent out software updates to the products I had purchased, even after they had left the store. This continuing communication demonstrates that the Defendants are in the best place to sell their products with filters because updates to the filters could be part of the software bundle that they send out. The products were effectively in exclusive control of the Defendants, when I was injured because their false advertising and fraud had caused me to let my guard down. The measure of control that the manufacturing and retail Defendants maintain over their products after they leave the store is a factor in aggravation for the purposes of damages. The nature of the Defendants products suggest a heightened standard which they are in violation of. The Defendants are liable under aggravating factors because of their continuing control. They deserve to be bankrupted.

96. **OUTRAGEOUSNESS ELEMENT OF PRODUCTS LIABILITY TORT IS PRESENT**

HERE: The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The Defendants here are worse than

Backpage.com.¹⁶⁰ Their products themselves are gateway to brothels and sex trafficking establishments, and places an essential role in organized crime. The porn compact must be brought to an end through the force of law. The fact that the Defendants are increasing the demand side of sex trafficking, placing the police in greater peril, and falsely marketing themselves as family friendly is outrageous, given the fact that they have the ability to sell their products on safe mode under an opted out system. Outrageousness is established for purposes of *Doe I ex rel. Doe v. Roman Catholic Diocese*, 154 S.W.3d 22, 39 (Tenn. 2005) and is a factor in aggravation against the Defendants in the calculation of damages. The Defendants have the technology to make their products safe, but like Backpage, they apparently do not care about society, their customers, or their families.

97. Given the evidence that the Defendants products (1) encourage the demise of guys; (2) increase demand for child pornography; (3) increased demand for sex traffic; (4) increased demand for prostitution; (5) increased sexual addiction; (6) increased depleted capacity to form bonds; (7) diminished capacity to experience intimacy; (8) increased number of destroyed marriages; (9) increased job loss; (10) increased sex crime; (11) increased shift into the sex slave industry by the world's worst cartels; (11) increased number of children from broken homes, there is no way for any person to deny that the Defendants conduct has been anything other than so outrageous in character, so extreme in degree, as to go beyond all bounds of decency, to be

¹⁶⁰ The Defendants operate under the same value systems that know prostitution hubs like Backpage.com do. When the Craig's List killer incident happened, Craig's List dismantled its adult section to mitigate wrongful death litigation. All of the adult business that Craig's List had, immediately went to Backpage.com, pursuant to the principles of supply and demand. Backpage knows that their website is being used to run a prostitution racket, but Backpage is making so much money from prostitution, they simply do not care whose lives they are destroying and endangering. Backpage is prepared to defend their piece of the criminal misconduct in the same way Apple has been, which will serve to completely backfire. Thus, we are in the bowels of a sexual holocaust and silent epidemic because of the molestation of "free speech arguments" and "vicious greed," which is eroding our collective effectiveness and personal freedom, and preventing us from living in harmonious community with one another.

regarded as atrocious and utterly intolerable in a civilized community. *Miller v. Wilbanks*, 8 S.W.3d 607, 612 (Tenn. 1999) (citing *Bain v. Wells* 936 S.W.2d at 623).¹⁶¹

98. The products have underscored mankind's spiritual crisis, demonstrating that we are looking for something to relieve pain and suffering. Turning to the wrong portal will accomplish the reverse. The Defendants products promise life, and deliver death in the same way that crack cocaine does. They must be regulated to preserve the freedom of choice and the right to pursue lasting happiness. The fact that Defendants have manipulated and twisted first amendment arguments in the name of freedom only to advance the demand side of human trafficking and marital destruction is completely outrageous. The fact that Device Makers are not being required to follow the same laws as everyone else, that they have brought pornography above ground, and that they acknowledge a moral duty to protect their customers from pornography but do nothing to protect the user, when they can is totally outrageous. The concealment of truth, the failure to warn, the failure to test, the failure to card, the shifting the blame onto parents, the false advertising campaigns is completely outrageous. The fact that the Defendants are destroying families and causing addiction by unduly violating a person's emotional access with content that was served up on a platform that they created without any safety mechanism is outrageous. The fact that the Defendants that they are distributing unlawful content that is tied and connected to human trafficking is completely outrageous.

VI. FRAMING THE ELEMENTS OF RACKETEERING

¹⁶¹ As Martin Luther stated regarding lust, "we cannot keep the birds from, flying overhead, but we can prevent them from nesting in our hair." Filter system I propose removes the nests and leaves a dent in the sex trafficking racket that the Defendant's greed and indifference has cultivated. Additionally, for these reasons the Defendants have violated the "civilized society," element of products liability. If the general public understood the degree to which pornography is driving sex trafficking they would not tolerate this the manufacturers partnership with the pornographers. *Riley v. Whybrew*, 185 S.W.3d 393, 399 (Tenn. Ct. App. 2005). *Lane v. Becker*, 334 S.W.3d 756, 763 (Tenn. Ct. App. 2010). The fact that pornography threatens marriages is a total breach of the most precious asset of civilized society.

"No More Mr. Nice Guy." Alice Cooper

99. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. First, I want to emphasize that I am by no means your stereotypical "conspiracy theorist type," as the Defendants attempt to pretend in keeping with their pattern of dishonesty. I wanted to believe that there was not a conspiracy at work, as evidenced by the tone and nature of the original complaint. The fact that there is an enterprise between the tech companies and pornographers collectively is inescapable. The responses of my defendants here and 3:14-cv-1313 demonstrate that alone.

100. Beginning in 1996, the defendants formed "the Enterprise," which I call the "porn compact" as that term is defined in 18 U.S.C. § 1961(4). This enterprise mirrored the tobacco industry enterprise who came together and agreed to not warn their customers about the harmfulness of their product, when they knew that Tobacco is addictive. This enterprise is no different than the auto industry compact not to sell their cars with seat belts. The auto-industry blamed the "nut behind the wheel" for their own injuries in the aftermath of an accident in the same way that the members of the porn compact "blame the parents" and the consumer under self-censorship and freedom rhetoric. The "blame the parents" false narrative was started by the pornography industry and picked up by the tech companies. The tech companies are the mouthpiece for the pornographers.

101. Each Defendant has participated in the operation and management of the porn compact, and has committed numerous acts to maintain and expand the Enterprise. The shared goals of the Defendants is maximizing their profits and avoiding the consequences of their actions. Each

Defendant has participated in the operation and management of the Enterprise, and has committed numerous acts to maintain and expand the Enterprise.¹⁶²

102. The Formation of the Enterprise and the Nature of the Conspiracy: At present, there are hundreds of scientific reports in the public domain that establish that pornography is biochemically harmful and addictive. The evidence that viewing it decreases the quality of a person's life is overwhelming. There are countless studies that link easily access to pornography to the demand side of human trafficking, violence towards women, and the degradation of decency in our present culture.¹⁶³

¹⁶² In order to avoid discovery of their fraudulent conduct and the possibility that they might be called to account for their conduct, defendants engaged in a widespread scheme to frustrate public scrutiny by blaming the porn epidemic "on the parents" inability to monitor, scapegoating the web and ISPs, twisting "freedom of speech" arguments, pretending to have arms length relationships with pornographers, championing the global necessity of the "wait and see" justification regarding an "open and share" model." Meanwhile, the Defendants know that all of these excuses and midsections are implausible. Defendants' tortious and unlawful course of conduct has caused consumers of defendants' products to suffer dangerous and decreased quality of life. As is evident throughout these proceedings and elsewhere, the scheme included making false and deceptive statements to the public and in congressional, judicial, and federal agency proceedings. Defendants' tortious and unlawful course of conduct has caused consumers of defendants' products to suffer dangerous diseases, loss of the quality of life, loss of employment, loss of family, and injuries. As a consequence of defendants' greedy, tortious, and unlawful conduct, the Federal and state Government, along side of churches and anti-sex trafficking groups, spend billions annually for the treatment of injuries caused by defendants' products. The effect of defendants' fraudulent scheme and wrongful conduct continues to this day; defendants are continuing to prosper and profit from their unlawful and tortious conduct; and, unless restrained by this Court, defendants are likely to continue their unlawful activities into the future.

¹⁶³ In response to this, the Device makers have embraced the "blame the parents" rhetoric. This is no different than the automobile industry blaming "the nut behind the wheel" for injuries following accidents, so that they could avoid being forced to sell their cars with seat belts. I respect Harvard trained Ralph Nader, of the Green Party, very much for his efforts in those affairs, as a true American trustee for consumer protection. "Sexy Cars" were the iPads of those times. Auto manufacturers GM, Chevy, Ford, Chrysler, did not want to sell their cars with safety features because it amounted to an omission of their culpability of liability following injury and death. The auto manufactures were terrified that if the Government regulated them in the way of safety, it would open the door to regulating them in the areas of pollution and fuel efficiency. The truth is that in providing seat belts, the automanufacturers have limited their liability because they have taken proactive measures to make their products safe for consumption. The Device makers should follow suit, since internet exceptionalism is dead. The auto manufactures came together to agree that they would none of them would sell their products with safety features so that they would not all be required to do so. When Henry Ford came forward to announce the release of a safety packet, the other auto manufacturers maneuvered to force him to withdraw the safety packets despite the demands. Now, there are statutes that make regulation of safety features in cars strictly required. Like wise, the Defendants in the porn compact have sought to ensure that no company -- in the United States or overseas -- - broke ranks from defendants' public posture, which was based on falsehood and deception.

103. To further and protect the Enterprise and conspiracy and their profits, defendants made false and misleading statements to the public through press releases, advertising, and public statements, such as before Congress, that were intended to be heard by the consuming public.¹⁶⁴

104. Throughout the course of the Enterprise and conspiracy and to the present day, defendants have engaged in these acts knowingly and intentionally and with a common purpose.

a. the Defendants have sought to create false doubt about the health effects of viewing pornography because they knew that such doubt would influence consumers to begin or to continue look at pornography that their products distribute like no other; even saying that porn was "good for you," "fun," "harmless," "natural," "good for marriages," "changing teen sex for the better." The truth is that pornography is addicting, damaging, crushing, unnatural, and harmful in countless ways. The pornography the Defendants distribute gets inside of the viewer, like no other content, and impacts the way they date, treat members of the opposite sex, and behave.

b. the Defendants have given donations to the ALA and ACLU type groups to infiltrate the our schools to turn students on to pornography that the Defendant's products provide in abundance, at no cost, and with appeals to children. The Defendants have given contributions and taken control of countless lobbying groups like the "Democracy and Technology" and the "Free Speech Coalition" to bully their false and self-serving rhetoric into the National consciousness.

¹⁶⁴ The OTWG that the defendants were involved in before Congress was a total outrage of incredible dishonesty. The Defendants have been making this falsified "Let's wait and see" argument before Congressional committees regarding pornography. The Obama administration has been a major supporter of pornography because the administration is a subscriber to Sal Alinsky "Rules for Radical." The Democrats know that selfish/godless liberal people vote democrat. Porn unquestionably proliferates liberal atheistic selfishness that keeps Democrats in power.

The Defendants and their co-conspirators are not merely captains of consciousness. They are proliferations of corruption and mass evil. Their greed is insatiable and out of control.

c. the defendants have sought to prevent discovery and the disclosure of documents. The Defendants analytics on porn consumption would unquestionably tell the Court and the public just how important pornography is to their business model, given (1) the frequency upon which pornography sites are assessed on their products, given (2) the addictiveness, availability, affordability, anonymity, and the aggressiveness of predatory pornographers, who advance the goals of the Tech companies.

d. There is nothing “adult” about pornography.¹⁶⁵ The 1000 testimonials provided by Fight The New Drug demonstrates that conclusively. The Porn compact aggressively targets children and young adults because children fail to appreciate the hazards of viewing pornography and its addictiveness and are more easily induced to start an addiction that would lead to a lifetime of viewing pornography on their products. It is this codependency that the device makers exploit at the expense of the public health, safety, and welfare of consumers. Children have been thrown to the water and left to drown, as they are forced to navigate a porn cultural where predatory pornographers are hunting them in hopes of converting them to life time users.

e. The Defendants know that that use of their product was unreasonably and unnecessarily dangerous to the lifelong customers that they sought to addict.¹⁶⁶

¹⁶⁵ Declarant Joann Hamilton, founder of Citizens for Family, was a lot to say about this matter. She crusaded to compel retail stores to sell their products behind a barrier shield. The retail stores were putting smut magazines in places where children could access them. Retailers fought her tooth and nail.

¹⁶⁶ George Weissman, Vice-President of Philip Morris, told the Pioneer Press on March 31, 1954, that the cigarette industry would "stop business tomorrow" if it believed smoking was harmful. The Defendants have knowledge that pornography is harmful, but it wants to continue business as usual.

105. In contrast to defendants, who long knew and understood the adverse health effects of interacting with porn their products distribute, many members of the public, including myself, did not fully appreciate the risk to their health posed by pornography on their brains, bodies, marriages, and quality of life. At all times, Defendants made such false and misleading statements with the express purpose of deceiving the public and inducing purchasers to minimize the health risks and continue not complaint about the forced interaction with pornography. Defendants also had full knowledge that, as their fraud succeeded, more Americans would suffer from porn addiction and be dependent on their product. Because they failed to warn consumers and lied about the health effects of the porn they distributed many Americans, including millions of children, have become addicted to computer pornography, and many people who were already pornography have had more difficulty quitting, with resulting damage to their health, relationships, families, reproductive systems, and quality of life. .

106. As a means to further the aims of the Enterprise and conspiracy and as an adjunct to their claims that there was an open question as to whether the pornography they distribute causes addiction, the defendants have agreed not to conduct an investigation between the porn they distribute and the hazards to sexual health and divorce. The Defendants want their customers to unquestionably believe that the products they are selling will improve the quality of their lives, and if it harms them, it is their fault. The Defendants hide behind their brand name, freedom rhetoric, and technological expertise in scapegoating everyone else for creating the platform for the horror that they invited and unleashed with absolute impunity until now.

107. Another way that the device makers and ISPs have mislead the public is by making minimal contributions in the war against pornography only to count them as major victories when they are

not.¹⁶⁷ The examples that have been collected are beyond infuriating. The Defendants know that they are engaging in classic misdirection in order to continue their nefarious scheme, while using shame to silence would be whistle blowers and prideful threats to reputation to stifle oppositional speech which could threaten their out of control greed scheme with has cultivated a sex trafficking holocaust.

108. **The Present and Continuing Threat To The Public** Defendants' conspiracy to deceive, mislead, and withhold information from the public, and from public legislative, regulatory, and judicial bodies about the adverse health effects of interacting with the pornography they are distributing for their own paramount benefit continues to the present day. The dangers of filterless devices exist up to this present day. I wish I could do a better job of emphasizing the how much danger we in with predatory pornographers creating fake profile accounts on facebook and tinder to rope in children into prostitution world. The pornography made available by the Defendants is the ultimate coaxer that erodes inhibition and leds to giving in, which interferes with the goals of the victims and their pursuit of a vibrant future.

109. Defendants' Liability for Fraud (Fraudulent Misrepresentation, Concealment, and Nondisclosure) Defendants and their co-conspirators have engaged in a consistent course of conduct through which they have fraudulently misled past, present and prospective consumers, governmental authorities, and other members of the public regarding to the dangers presented by their filterless products. The Defendants have taken a play from the pages of the automobile

¹⁶⁷ One tactic for the device companies is to support the so called pro-family groups who will carry on the conversation with them about parental responsibility. This is a Tech company dominated conversation. They want to frame the discourse. Google might report a single individual for emailing child pornographic images. On tech company may give a small donation to a pro-family group that is spreading awareness of porn's harmfulness, knowing that this message will actually increase porn consumption because their are no in place barriers.

companies by "blaming parents" or the "nut behind the wheel," when they are the ones to blame for inviting pornographers to infiltrate our persons and homes. The Defendants and their co-conspirators have made false and misleading statements that there is no causal connection between access pornography and adverse health effects on their reproductive systems, mental health, and quality of life, and marital contract. The parental controls don't work as sold in the current condition. But what parental controls do accomplish is another form of misdirective fraud so that the Defendants can say "see we are family friendly." The Defendants objective is to create the appearance of safety, while not actually providing it. The parental control model is predicated in arrogance, and wrongfully assumes that the so called adult/parent is immune from the temptations of porn themselves. This would be like suggesting that "smoking meth only hurts children." The Defendants use the adults shame and pride as a weapon against them, as if to appeal "aren't you infallible." The Defendants silent message in parental controls assumes that adults are above their humanity, which is dehumanizing on its own terms.¹⁶⁸ The Defendants omit fact by not telling their purchasers of the perils of the porn that they will be forced to encounter after purchasing their products. The defendants blamed everyone else for unleashing porn unto the Globe but themselves. They deny marketing their products to children in hopes that the youth will become young addicts of the pornography they distribute. The Defendants and their co-conspirators secretly want addicts of all ages. But its best for them to have a porn addict for life, who is codependent on their technology. Their technology is doing more to alienate us as a families, communities, and as a people group than it is to bring us together in large part

¹⁶⁸ The Nazi's thought they were super human too, but that did not work out so well for the world.

because of the porn ingredient that has to be cracked down on responsibly from the device maker, ISP, and ICANN level - starting with the device maker level.

110. The Defendants and their co-conspirators committed thousands, and perhaps millions, of acts involving material fraudulent misrepresentations, fraudulent concealment, and fraudulent nondisclosures since the inception of the formation of their porn compact.¹⁶⁹ The Defendants' and their co-conspirators' acts of concealment took a number of forms, many of which are unknown to the Plaintiff because such actions and concealment are within the exclusive knowledge of defendants. The Plaintiff is unable to allege in full the numerous advertisements, press releases, and other communications that defendants and their co-conspirators released over the past 18 years because the Plaintiff does not have access to this information. But there is more than enough information that the Plaintiff does have that is asserted here is establishes their fraudulent misconduct.¹⁷⁰

111. The Defendants have intentionally or recklessly failed to disclose or deliberately concealed material facts from the public and governmental agencies regarding their compliance with the law, the family friendliness of their products, the harmfulness of pornography, the effectiveness

¹⁶⁹ The Defendants and their co-conspirators had superior access to information about pornography, health, and the tactics of predatory pornographers, whose efforts they encourage. The Defendants have not been forthcoming or truthful as they do single acts here and there to make it appear as if they oppose pornography, when they are absolutely against any form of censorship to the point that they purposefully set out to dehumanize and destroy anyone who calls them out on their fraud and greed. See the reaction to the filing of this lawsuit. The Device makers have engaged in Congressional research committees such as OTWG to provide findings to Congress regarding the harmfulness of the pornography they distribute, but have been grossly dishonest and non forthcoming.

¹⁷⁰ The Defendants have a duty to not break obscenity laws. The Defendants have presented themselves to the public as being law abiding. When they are not. The display obscenity laws make it illegal for a retailer to not have pornographic material within their store to have their pornographic content stored behind a shield barrier. It is not the job of the customer who enters the store to bring the barrier or the key to shield their eyes. It is the job of the store owner to shield the eyes of the customer. The products sold by the Defendants are portable stores. They are extensions of the original stores. And yet, the Defendants refuse to honor display laws and place their pornographic content behind a shield barrier. Instead, in keeping with their incredible fraud, dishonesty, and hatred towards humanity, the dehumanizing defendants float this "blame the purchaser" for injuries that would have never come about "but for" the purchase of their dangerous and defective product.

of parental controls, and on and on.¹⁷¹ The Defendants are unquestionably the spear head of a sex trafficking holocaust. To attempt to blame pin the destruction they are responsible for under a platform system that they created is completely asinine.¹⁷²

112. As a direct and proximate result of the fraudulent misrepresentations, omissions, and concealment by defendants and their co-conspirators, individually and collectively, members of the public, including myself, began to interact with highly graphic and highly damaging pornography, and, as a result, they suffered harm to their sexual health, emotional health, biological health, mental health, spiritual health, and quality of life in general. Third party filtering companies have sprung up to attempt to solve the problem to protect their families, which serves as an omission of guilt in regards to the device makers breach of duty. It is the product manufacturers job to sell their products in a safe condition. The Defendants should be required to pay out hundreds of millions of dollars to reimburse third party filtering companies for their efforts, which are not another scapegoat for the Defendants to seize upon, as they have maliciously done in this case. The presence of these third party filtering companies are direct

¹⁷¹ Members of the public, to include the Plaintiff, believed in the truth and completeness of the statements made by defendants and their co-conspirators. They relied upon the statements by defendants and their co-conspirators, including statements that created a false controversy about pornography addiction, respect for the law, and safety, and demonstrated that reliance by purchasing, and by refraining from trying to avoid looking at pornography or know that doing so was so incredibly hazardous. The belief in and reliance upon defendants' and their co-conspirators' representations by members of the public was intended by defendants and was both justifiable and reasonable. Verizon, who is a conspirator, sounded off to the public that it was proud to be distributing pornography. The reasonable inference is that the consumer could be proud to view it. Not only that the Defendants have given contributions and donations to organization that are dead set on antagonizing Christian organizations and encouraging pornography consumption. Planned Parenthood being the flagship of these poisonous institutions. Bill Gates father worked for Planned Parenthood, and so it is no wonder that Microsoft donates millions of dollars to Planned Parenthood, who then infiltrates school and encourages the students to consume pornography. <https://www.lifesitenews.com/news/bill-gates-planned-parenthood-president-dad-inspired-pro-abort-funding>; <http://beginningandend.com/planned-parenthood-caught-teaching-children-about-bondage-watching-porn/>

¹⁷² Indeed, it is defendants themselves who are in the best position to know the contents of each and every such misrepresentation and fraudulent statement. Specific examples of the material fraudulent misrepresentations, fraudulent concealment, and fraudulent nondisclosure of defendants and their co-conspirators include, but are not limited to, examples presented in the attached exhibits.

evidence of the grossly injustice that the Device makers have been allowed to perpetrate on modern day civilized society to unimaginable depths all under the false banner of freedom. The Device makers have abused the very freedoms that Democracy normally affords and have managed to tarnish capitalism and our system of governance itself. But there is a remedy, and that is the dark and despicable world of pornography should be forced underground, and not invited into our homes and schools by the issuance of injunction.^{173 174}

PART TWO

THE PRIMARY COMPLAINT

VII. JURISDICTION AND VENUE

113. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully here. This Court has jurisdiction of the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1343 because the matters in controversy arise under 18 U.S. Code §§1961-1968 violations of the R.I.C.O act¹⁷⁵ and the Lanham Act. 15 U.S.C. § 1051. This Court has personal jurisdiction over myself and Defendants through Federal question jurisdiction.

¹⁷³ The Defendants should have to pay huge summons to the hundreds of faith based Christian organizations that have sported up to combat the human trafficking epidemic. The victimizers of sex trafficking are victims themselves by the non-enforcement of the law on device makers. Those uploading pornography, like those who upload copyright infringed works, are not the ones for the Defendants and their co-conspirators to blame at this time. Without the device that powers on and off, there is no platform for this kind of destructive pornography to work its destruction in the lives of Americans and the international community.

¹⁷⁴ And lets be crystal clear, I am not anti-sex, as Apple pretends as an extension of its impressive immaturity. I am not a puritanical nanny. I am pro-choice when it comes to being exposed to porn. I want consumers, like myself to have an option of having a clean experience. The Plaintiff is a proponent of healthy forms of sex. And sex is all about the context. And the Bible is correct - sex is best between members of the opposite sex in the confines of covenantal marriage. And failing to see that amounts to a refusal to think and an absence of seeing.

¹⁷⁵ The civil provisions of Chapter 96 of Title 18, United States Code, codified at 18 U.S.C. §§ 1961 through 1968, entitled Racketeer Influenced and Corrupt Organizations ("RICO"), that authorize the United States to seek a judicial order preventing and restraining certain unlawful conduct. A private citizen can seek recovery under this statute if the injury as a result of concerted effort took place within his property.

114. Venue is proper in this Court under 28 U.S.C. § 1391 (b)(1) and (2) because one or more Defendants reside and or was doing business in this District. The Defendant Comcast reached into Tennessee and inflicted the injury onto the Plaintiff due to corporate policy handed down from the office located in this state. *Henderson v. Merck & Co., Inc.*, Civ. A. No. 04-5987, 2005 WL 2600220, at *7 (E.D.Pa. Oct.11, 2005)¹⁷⁶ (citing Restatement (Second) of Conflicts § 145).

115. This Court has authority to enter a declaratory judgment and to provide preliminary and permanent injunctive relief pursuant to Rules 57 and 65 of the Federal Rules of Civil Procedure; 28 U.S.C. §§ 2201 and 2202; and under the Civil Remedies section of the RICO act.

116. I bring this complaint under 28 U.S.C. 1332, as the parties and myself are completely diverse in citizenship and the amount in controversy exceeds the minimal jurisdictional limit of \$75,000.

117. Tennessee State law should apply since the injury was felt in Tennessee as a result of malicious conduct perpetrated out Tennessee.¹⁷⁷

VIII. PARTIES

¹⁷⁶ [W]hich state has the most significant contacts with the litigation. “In making this determination, this Court must look to an array of factors: (i) the place where the injury occurred; (ii) the place where the conduct causing the injury occurred; (iii) the domicile, residence, nationality, place of incorporation, and place of business of the parties; and (iv) the place where the relationship, if any, between the parties is centered.”

¹⁷⁷ An action for injuries sustained by plaintiff in an automobile accident occurring in Alabama was transitory and could be filed wherever the defendant was found. *Fowler v. Herman*, Tenn.June 08, 19564 McCanless 201 292 S.W. 2d 11.

118. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully here. I, Chris Sevier, am the Plaintiff. I was injured on within his property¹⁷⁸ in Nashville Tennessee at 3110 West End Circle, Nashville, TN 37203.

119. Comcast is located at Comcast Corporation Comcast Center 1701 JFK Boulevard Philadelphia, PA 19103. Comcast was doing business in Tennessee when it reach into that state an inflicted injury. It was the policies handed down from the headquarters in Philadelphia in keeping with the porn compact that caused the injury. Comcast was the service provider that I had in my home when I forced to interact with highly addicting, erodic, pornography that caused the injury.

120. Time Warner Cable Inc. is headquartered at 1 Time Warner Center, New York, NY 10019-8016. Time Warner can be served there. Time Warner joined the porn compact in Vegas, but the impact of that caused the Plaintiff to suffer injury in Tennessee. 4. American Telephone & Telegraph Inc., AT&T, Inc is located at 208 South Akard Street, Dallas, TX 75202. AT&T can be served there. AT&T joined the porn compact in Vegas, but the impact of that caused the Plaintiff to suffer injury in Tennessee.

121. The American Civil Liberties Union is located at 125 Broad Street, 18th Floor, New York NY 10004. The ACLU can be served there. The ACLU is a highly religious special interest lobbying group that has held the Congress, family groups, whistleblowers, hostage through harassment lawsuits and other means. The ACLU received donations from the tech companies,

¹⁷⁸ Psychologist call internet pornography the new crack cocaine. It challenges society in the way that cocaine did. It is if we have a cocaine pipeline pumped into our houses 24/7 and as if the cocaine is free, and the children know how to get it better than the parents do. The Defendants and their co-conspirators have piped the new cocaine into our houses so that we are wired all the time. It is a "sleepless malice."

which has unquestionably targeted Christian groups and concerned citizens to advance the porn compact. 6. American Library Association (ALA), 50 E. Huron St, Chicago, IL 60611. They can be served at that address. ALA has played an essential role in advancing the porn compact.

Although the ALA pretends to be peaceful librarians, it consist of radical liberals who are extremely pro-child porn.. The ALA has filed harassment lawsuits against advocates of freedom from pornography as an unlawful means to censor them.

122. Cox Communications Inc., also Cox Cable, is located at 1400 Lake Hearn Drive Atlanta, GA 30319. They can be served at that location. Cox Communication joined the pornography compact and furthered its goals in conjunction with the other Defendants.

123. Helen Rogers can be served at 2205 State Street, Nashville, TN 37203. Mrs. Rogers is part of a domestic lawyer lobbying group who financially contributes substantially to liberalize domestic laws and to advance the porn compact. Upon information and belief, she is extensively involved in supporting the free flow of pornography in Tennessee so that she will have more clients seeking divorce. Upon information and belief, she received funds by Tech companies to advance the child pornography agenda. In connection with lawless state prosecutors, ADA Jane Waters of Houston Texas and Johnston's ADAs of Nashville, Mrs. Rogers wrongfully capitalized off of the porn compact by inventing fake civil and criminal actions for the alternative reason to get payback for beating her and others in prior cases and for filing reports with the Board of Ethics for insurmountable misconduct.

124. Cyndi Sherwood can be sued here: 201 4th Ave. North, Suite 1130 Nashville, TN 37219.¹⁷⁹

Mrs. Sherwood was been married and divorced three times. So, her last name changes in proceedings between Rich and I from Parson, to McKenzie, to Sherwood.¹⁸⁰

XI. FACTS

125. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. I've been sprinkling fact about me and the injury inflicted in part one of the complaint. But here is the primary fact section. Within 10 years of filing the lawsuit, I purchased products from Apple and their authorized stores to include, Verizon, Apple Store, and Mac Authority. I purchased HP products from a computer store on White Bridge Road. In 2005, I purchased Comcast Cable network for my home 3110 West End Circle, Nashville TN 37203 from Comcast. I called several others ISPs, some of whom are name Defendants here, but decided to retain Comcast's services. None of the ISPs offered internet service with filters or safeguards. I naturally assumed that Comcast and the other ISPs were law abiding and that their products were safe. The Defendants and their co-conspirators knew that they were distributing into my home abundant access to pornography that was highly damaging and addictive. They did not provide any warnings whatsoever, when knew that they had a duty to

¹⁷⁹ <http://sherwoodlitigation.com>

¹⁸⁰ One might ask why am I suing Sherwood and not the state of Tennessee. Sherwood is controlling the state. As a former prosecutor, I believe in the redemptive qualities of prosecutors. I prefer to build up states, not tear them down. Civil lawyers, like Sherwood and Rogers, whose entire business practice literally revolves around doing everything and anything to please wealthy and corrupt clients deserved to be sued for their malicious conduct and abuse of process. I should not be placed in a position where I have to sue lawyers. The Board of ethics is supposed to do that. There is no one to govern the board of ethics so they can target lawyers, like me who do not care about politics. They can advance the interest of their friends in exchange for all kinds of quid pro quo kick backs. The lack of checks and balances over the BPR is harmful to the legal profession at large. Accordingly, Sherwood/Parson/McKenzie is rightfully a defendant here, as she should be in a malpractice case brought by poor Rich.

do so. The Defendants did not provide any filter options even though they knew that they were distributing obscene material into that violated the community standard. The Defendants and their co-conspirators knew that they would be subjecting the Plaintiff to a litany of hazards, including exposure to materials that could cause divorce, addiction, sexual voyeurism, and criminal allegations. The ISPs did not provide me with any warning that I could be injured through using their products. They did not warn me about the perils of pornography nor of the tactics used by the predatory pornographers, who they partner with. None of the Defendants provide me with any warning that I could encounter pornographic content, while using their product, that might decrease the quality of my life, cause addiction, and be harmful to my family. To the contrary, they marketed the devices as having the ability to enhance family relationships.

126. Yet, when Comcast sold me the device, it was aware that I would encounter pornography through the normal use of their product in conjunction with device makers. The Defendants and their co-conspirators knew that this exposure would threaten the quality of my life, exploit my biology adversely, and interject addiction at the expense of my family and health. The Defendants and their co-conspirators invited, welcomed, and encouraged predatory pornography to cause forced interaction through fraudulent tactics. These forced interactions did occur. I was subsequently inflicted with the perils of pornography discussed within this complaint to include adverse impact to reproductive health, mental health, and relational health. These injuries are ongoing and continual. The injuries require continual ongoing treatment that the Defendants' should be responsible for, as well as a host of other damages for the irreversible decrease quality in life.

127. Despite this knowledge, the Defendants failed to do anything to keep me from coming in contact with the content that would have an adverse impact on my reward cycle and neurological make up. In fact, the Defendants marketed themselves as selling family friendly products; when in reality, the manner in which the products are sold pose an imminent threat to families and relationships. The Defendants engaged in false advertising by marketing their products as family friendly, when they are not. This misleading advertising caused me to lower my defenses, which lead to a personal injury following forced encounters with pornographic content that caused addiction.¹⁸¹ The following tactics used by pornographers that the Defendants distribute included: (1) free Teaser images; (2) ¹⁸² innocent Word searches;¹⁸³ (3) Misspelled Words;¹⁸⁴ (4)

¹⁸¹ Addiction is merely engaging in repeated activity that interferes with one's goals. Even if you want to stop, you don't because the reward cycle has been altered. Customers like myself have the right not to be introduced to addicting content in the first place. Here are some of the lies that the Defendant's products foreseeably conditioned: Lie #1 *Women are less than human*; Lie #2 - *Women are a "sport"*; Lie #3 - *Women are property*; Lie #4 - *A woman's value depends on the attractiveness of her body*; Lie #5 - *Women like rape*; Lie #6 - *Women should be degraded*; Lie #7 - *Little kids should have sex*; Lie #8 - *Illegal sex is fun*; Lie #9 - *Prostitution is glamorous*

¹⁸² Most pornography sites do not request age verification of their visitors and offer a multitude of free samples of pictures and/or streaming videos to entice users, including. Sexual activity of every form (i.e., sexual intercourse, masturbation, bisexual interactions, group sex, oral sex, fetishes). Cybersex and cyberchats with "live" feeds (i.e., user can view and/or interact in real time with a porn star). Site "tours" (i.e., walks user through a virtual table of contents of pictures, videos, and pornographic experiences available).

¹⁸³ For example I did a word search for "creampie" on my HP and encountered addicting hardcore pornography. Pornographers use popular terms or innocent words that may have little or nothing to do with the content they display they display to increase traffic to their sites through search engines.

¹⁸⁴ For example, I misspelled "Facebook," which lead me to pornographic websites. Our declarant from M.A.T.H. misspelled myspace. She went to mysplaces.com, which was a hardcore porn site. Online pornographers purchase domain names with commonly-misspelled words, such as typing "boyz" instead of "boys," which can direct an Internet surfer, who misspells a word to sites containing extreme hard core material.

stealth sites;¹⁸⁵ (5) Pop-ups and ad Banners;¹⁸⁶ (6) e-mail spam;¹⁸⁷ (7) Mousetrapping;¹⁸⁸ (8) looping, (9) free samples.¹⁸⁹ The Defendants and their co-conspirators encourage, enable, and support these fraudulent tactics for their own paramount benefit.¹⁹⁰

128. I have the fundamental right to practice religion and to be free from unknowingly developing an addiction as a result of using the Defendants' products that interact and depend on devices that connect to the web. For government related purposes, work related purposes, and personal family purposes, I was required to own products sold by the Defendants. However, I have the fundamental right not to be forced to be roped into interacting with obscene content because of a greedy scam to wrongfully exploit the biological makeup and vulnerabilities of the user. The focused exposure to pornography interfered with my freedom to practice religion. In using the Defendants' products as intended, I developed porn addiction, which devastated the most important relationships in life. My sweet wife, simply could not compete with the endless

¹⁸⁵ Online pornographers often purchase "Stealth URLs." These are sites with web addresses that are close in name to the legitimate site.

¹⁸⁶ Pornographers often purchase available banner space advertisements on popular websites and social networking spaces hoping to draw young users to their sites.

¹⁸⁷ Otherwise known as "junk e-mail." I got junk mail spam that provided links that I clicked on that lead to porn websites.

¹⁸⁸ This crafty "tech-trick" prevents users from escaping a pornographic site once they have entered it.

¹⁸⁹ A seemingly never-ending stream of pornographic pop-ups that appear on the computer screen that continues until the computer is shut down.

¹⁹⁰ I was not personally a victim of porn napping; (Porn-napping: Pornographers purchase expired domain names, so what was once a web address for a legitimate company takes users to a pornographic site); Free Flash Gaming: (Many popular websites integrate interactive, easy-to-use games that are designed to be attractive to children, such as puzzle games, word games, card games, and uncomplicated animated games. However, pornographic games such as 'orgasm girl' are easily accessible to children); or cartoon Character Icons (Pornographers misuse popular cartoon characters such as those found at disneypornland.com.) But millions of children are falling prey to these tactics.

stream of ageless cyber vixens, who were enhanced in every way to maximize arousal and addiction. Real women are less clickable.¹⁹¹ Not so with the porn starlets, who offer no strings attached and a lifetime void of the intimacy that we all crave down to our core.

129. Like the rest of us, I have the fundamental right to not have pornography decrease the quality of my life by unwanted exposure to obscene content as a result of the tactics of predatory pornographers who are aligned with the Defendants and device makers. The Defendants' defective products exposed me to tactics that decrease the quality of my life. It caused my wife to leave me and to take away my son and all of our property. I effectively traded in my wife for an overweight, sadistic, man-hating divorce lawyer, Helen Rogers, who derives immense emotional satisfaction in hurting people in the same way that predatory pornographers do.¹⁹² Upon information and belief, Mrs. Rogers was paid over \$500,000 to harangue me by special interest group. Mrs. Rogers has been paid enormous sums to cultivate multiple fake criminal investigations in response to pre-existing civil lawsuits brought in Federal Court. Upon information and belief, Mrs. Rogers was paid by Apple to abuse process and bring harassment lawsuits in Tennessee state court in order to derail valid civil litigation in Federal Court. Apple and Mrs. Rogers' conduct violates the Petition Clause and amounts to an effort to censor and stifle my speech.

130. Even though I lived at the marital residence, I had emotionally abandoned her and my son due to exposure to pornography on the filterless products sold by the Defendants. Naturally, this

¹⁹¹ Internet pornography tends to be designer sex. You keep clicking until you find the idealized image or the preferred image of the moment. Expecting perfect and arrangeable clickable body types is unrealistic and leads to dissatisfaction in real relationships. But the Defendants did not warn me about that.

¹⁹² Such domestic attorneys are not regulated by the BPR at all, but manage to prove the dire need to completely overhaul the domestic courts to encourage mediation over formal proceedings.

is why the mother cited abandonment as the primary ground for divorce, even though it was I who was living at the marital residence. Unlike your typical father of a newborn son, I lacked the ability to maintain a connective bond with my son. This was directly due to desensitization following exposure to porn as a result of the enterprise that the ISPs played a fundamental role in creating in conjunction with device makers. Now my parental rights are subject to termination all because the tech companies and pornography companies partnered to inflict society with the same kind of fraud that the Cigarette Companies unleashed and for the same reasons - maximization of profits. The District Attorney's Office in Nashville is threatening to prosecute, investigate, and persecute me for having admitted to being a porn addict because porn addiction naturally leads to a digression of more and more extreme visuals of sex to achieve the same fix. ADA's under Johnson's reign of terror are in bed with Mrs. Rogers and Mrs. Sherwood. The two have been scheming to invent a basis to come up with ways to jail me in exchange for huge payouts by Frank McGuyer and John Rich. None of their spurious efforts against me ever work because they are predicated on immense dishonesty. Celebrity Apprentice winner John Rich's fake stalking case was predicated on a fake civil case. In August of 2014, Rich nonsuited his fake civil case to avoid being deposed. However, the ADA's who represented him do not care about the truth. She only cares about her conviction rate and appeasing donors to the campaigns of District Attorney's and state officials. The ADA's representing Rich threatened to have me investigated for exposure to child porn if oppressing me through the phony stalking charges does not work. I sued three assistant district attorneys for corruption, so the prior DAs office are out for revenge.

130. I would not be in such a position where I could be threatened by malicious state officials, if the Defendants and co-conspirators actually honored obscenity laws and sold their products with preset filters. I have suffered extreme emotional distress as a result of the threats directed towards me. This litigation tactic should be removed from the District Attorney's office tool box by giving consumers the freedom to choose porn. Otherwise, the Defendants and their co-conspirators are effectively setting their customers up for targeting by a state officials, who define right and wrong in terms of "if its right for me it must be right." After all, we are dealing with immoral District Attorney offices that will not prosecute the CEOs at the ISPs but will happily prosecute single individuals, who could theoretically commit sex crimes for a circumstance that the Defendants cultivated and that they allowed. The District Attorney's office attempts to pass that scenario off to the public as having accomplished justice, when they themselves have played a role in cultivating the potential crime scene due to their insufferable nonresponsiveness. It is completely outrageous circumstance that is fundamentally un-american. The Federal Courts did not ratify CDA and COPA because it would lead to more prosecutions, but the Federal Courts must enforce my filter demand so that it too will reduce malicious prosecutions cultivated by immoral divorce lawyers and dishonorable assistant district attorneys, who are profiting off of pornified culture. The last thing we need in this country is more prisons. I am extensively involved in prison ministry and the recidivism rate is telling. We need better system of checks and balances over people in a position of power - especially at the state level. Such state officials have an abuse entitlement that the ACLU should pay more attention to.

131. The Defendants and their co-conspirators are aware that males, like myself, are stimulated by visuals of sexually suggestive and illicit content that could be access in abundance because of

their products and impossible to avoid. I was stimulated by the visuals and enticed to encounter pornographic websites that provided free samples and mouse trapping techniques, which overwhelmed “willpower” and “defense mechanisms” through a deviant coaxing that is grossly unlawful. There were no warnings provided by the device companies that cautioned that indulging in the content they distributed would be devastatingly injurious and damaging.

132. Tennessee hails to be a fault state for divorce. One of the grounds included in the request for divorce was “inappropriate marital conduct.” Clearly, the allegation was brought in reference to the porn addiction that I had cultivated as a result of exposure to pornography on the filterless products sold by the vicious Defendants and their co-conspirators. If the Defendants had sold their products with filters, I would not have been charged with this breach and brutalized by a domestic state court system that is grossly dehumanizing and irreparably broken. The “inappropriate conduct” was that the Enterprise has conspired to advance the false narrative of “blame the parents game” so that they could be unregulated in wreaking total havoc in society for their personal gain. This system is a amounts to slavery in kind and is completely evil.

133. The Defendants and their co-conspirators were aware that selling filterless products would cause my dopamine levels to be adversely impacted through force encounters with pornography that were impossible to avoid through the normal use of the device. My dopamine level were impacted, and like pavlov’s dogs, I was conditioned to prefer porn stars over my sweet wife. Like with meth, a person cannot be a casual user of pornography because dopamine levels are raised too high. There are porn addicts who I have asked to attest in this action, who were also former drug addicts. When asked which was harder to quit, all of them say that pornography by far.

134. The Defendants knew that when pleasure pathways are used compulsively, a downgrading occurs in a neurotransmitter called dopamine. The Defendants were aware that the porn accessible through their products has the potential to reset the pleasure thermostat in their costumers brains, as it did in mine, as it destroyed my capacity for intimacy and bonding, causing the Defendants to harm the very relationships they promised to help through their false advertising initiatives. The Defendants had a duty to warn of the addictions that could result from using their products. This did not occur and I was harmed. I had no idea that pornography was tied so directly to organized crime. I do not want to consent to supporting organized crime. Before purchasing the products sold by the Defendants in the Enterprise, I had not encountered pornography. I have never smoked a single cigarette. I have never once tried illegal drugs. I rarely drink alcohol. If the Defendants had warned me of the dangers of pornography and required me to opt out, I would have remained porn free and the quality of my life would have been drastically better. There are children that would have been born that did not come into existence as a result of the porn scam advanced by the enterprise. This amounts to abortion and murder in kind. It is no wonder that the ACLU, ALA, Planned Parenthood, ect have acted as a cheerleader for the tech companies, as it infiltrates schools and preaches the Device Makers/ISP porn gospel - that pornography is natural, fun, and safe, when it is immensely destructive.¹⁹³

135. When the Defendants sold me their products, they knew I would be forced to encounter pornographic content that would cause adverse compulsive sexual behavior, arousal addiction,

¹⁹³ I want to highlight the ACLU hypocrisy for a moment. Not only did I lose my wife and child, I've been wrongfully hunted and stalked by slimy lawyers from Tennessee like Helen Rogers. I have mercilessly been targeted by the District Attorneys offices in two states. And meanwhile, where is the ACLU to stop such overt and intolerable malicious prosecution and abuse of process, when it comes to that kind of false targeting after I reported it to them? They are busy making matters worse by fighting against the truth on a constant and continuous basis because they don't even understand the truth. The ACLU have a bizarre set of ideas that they made up that mounts to a false religion that they cram down the throats of everyone else.

brain shrinkage, and decrease my capability to experience intimacy by hijacking my dopamine receptors. Before buying comcast services, I would not have thought of going to a sex shop or buying pornography from a store. However, in dealing with ISPs, the predators know how to rope you in and entice you with strangling ambush tactics that resemble a predator leading prey into a trap. The predatory pornographers who targeted me were too cunning, manipulative, and unregulated because of the lobbying groups. Once exposed to pornographic images of beautiful women who appeal to my senses, I could not help but be incredibly impacted. I am lover after all, not just a fighter. There are few things greater in this world than a naked member of the opposite sex. [emphasis added]. But I wish that my eyes were shielded and preserved only for my wife. But the Device Makers and ISPs gave me no choice in the matter and have blamed me for their outrageous failures to provide material safeguards so that their products could be “family friendly” as was promised through false ads. The Device makers and ISPs maliciously use shame as a weapon, which is incredibly distressful. When they never should have placed me or anyone else in this position.

136. When Comcast sold me their devices, they did not card me or to ask if I was over 18, knowing that when I used the device as intended that pornographers would hunt me down. If I was under eighteen, the Defendants would have been guilty of distributing obscenity to a minor. But the Defendants knew that it is equally a crime to distribute obscene materials to adults (materials that violate the community standard in Tennessee). The Defendants regularly violate obscenity laws by selling their the devices in dispute to minors. They simply do not care about the law or the well being of their customers, they want to make profits at all cost and have no problem engaging in false advertising because they have no center of morality. The only thing

that they care about is maximizing profits. The technician that Comcast sent to my house to install the router did not check my ID to see if I was over 18. He did not provide me with a safety briefing of any kind regarding the dangers of pornography.

137. None of the parties provided any warning that the devices would be distributing pornography onto my person which would cause arousal addiction, stimulation addiction, sexual anorexia, fear of intimacy, sexual compulsive conduct, detachment disorder, and decrease the quality of my life. In fact all of the ISPs statements where purpose to advance the notion that the companies had respect for the law and that their products were family friendly and safe, when they are neither.

138. Once the router was installed, I was tricked into interacting with pornography due to the manipulative tactics of predatory pornographers. If the Defendants had warned me that pornography was harmful and had sold their products with the tools to block obscenity, which required me to take the initiative to have the filters disabled, I would not have done so. I would have had the knowledge that porn was harmful and addicting (like tobacco manufactures provide) and I would not have suffered emotional and economic losses that followed.

139. In using the device as intended, I was forced to interact with pornography by the constant pop ups that amounted to "hooks" that overly exploited my attraction to enticing females. Once consent was infringed upon, it made it harder to resist engaging with pornographic content that was merely one click away at all times. At that point, the Enterprise had me. The brain cannot really tell a difference between real sex and porn, which creates codependency on the product providing the drug of detached sex with a voluptuous vixen who is insincere and suffering

herself, secretly wanting to be married and unconditionally loved normally. The porn starlets are someone's daughter. They are someone's future wife. But in their performances, these kinds of realities are not emphasized, only perverse self-gratification is at the expense of one's of reproductive, mental, and relational health. We cannot have a functional society where the government encourages men and women to objectifying one another by nonresponsiveness in the face of such overt evil, when the filters I demand are an easy fix.

140. The purpose of porn is unquestionably vicarious sex through lonely self-gratification with the invisible. When you speak of porn, you speak of self-sex. The two go together. Pornography is crafted so that the viewer can get off to it and and escape reality, numbing oneself through intoxicating fantasy of love and power that end up destroying both. Pornography is a destructive drug that takes something that is a great gift and perverts it. This escapism is addicting and caused the quality of the users life to deteriorate. Porn kills love. Viewers, such as I was not given the opportunity to consent to the harm that was befalling me. And the idea that the free flow of information creates spaciousness has demonstrated to in fact foster cataclysmic narrowness that suffocates the possibility of a maximized life, snuffing out relationships that civilization depends on. What the Enterprise touts as "freedom," serves to be a hellish prison of their making. Their lies need to be untwisted.

141. I lost my wife and child as a result of the condition in which the Defendants sold me their products. My emotional, mental, reproductive, occupational, health suffered. My liberty eroded. My quality of life decreased. The Enterprise is to blame.

142. If the Defendants had filters in place, I would not have been injured in this way and the transference of injury to those in my zone of influence would be much better off today.

143. Pornography is so abundantly accessible on the Defendants products that even young men with the most discipline and strongest will power are unable to resist the temptations presented to them constantly through the aggressive tactics of the pornographers, who mercilessly seek to entice the purchaser to become hooked on their obscene content.

144. Eventually, I did not just want to get off to porn but to have porn like experiences in real life. The ultimate message of pornography is prostitution. The Defendants and their co-conspirators know that. Pornography conditions the viewer to skip all intimacy and get straight to sex. But that is a violation of our natural design and a receipt for performance anxiety, sexual anorexia, and bad sex. We were designed for intimacy and commitment with a single member of the opposite sex. Casual sex is not as harmless as eating an ice cream sunday, regardless of what the philosophers at MTV preach, who are sponsored by durex. The pornography that the Defendants distribute condition the viewer to seek out escorts, which erodes the ability to be in a functional relationship.

145. Since I became conditioned by the Defendant's pornography to desire to get the fix with women of the opposite sex, I began avoiding the dating process altogether.

146. I discovered backpage.com, which is a hub of prostitution where females promised to provide porn like experiences. Pornography sites distributed by the Defendant's led me there.

147. Instead of picking up the phone to call an escort, I picked up the phone and sought help for what had obviously progressed into an escalating addiction. Viewing pornography pushes the

male down the path towards buying prostitutes. I practically drove to the local authorities and ask that they arrest me, since at least that would provide a form of legal accountability that the manufacturers and retailer refused to provide in bad faith. I refuse to commit a crime of any kind, regardless of what my political adversaries at the Nashville District Attorneys office pretend, as they set out to prove that Tennessee state system is the most corrupt in the country. As a whistle blower, I blew the whistle on myself after unjustifiably having been placed in a situation that I should not have ever existed in the first place. To recover, I decided to join the fight against human trafficking, after coming to the threshold door of it, as a way of recovery. Instead of kicking in doors with former Spec Ops extraction teams overseas, I have elected to bring this cause of action so that in seeking personal recovery for my injuries the Honorable Courts of the United States can force pornography underground again, where the United States Supreme Court wants it for good cause.^{194 195} Unlike the ISPs and their co-defendants, I am not a proponent of misdirection, I prefer to attack the source, not a symptom.

148. The ISPs have proven that although their technology cannot save us, it can completely destroy our lives, relationships, and the ultimate reality - parent child relationships. Porn is kidnapping freedom in that regard. The porn that the Defendants are distributing hurts everyone.

¹⁹⁴ I am living proof that computer generate pornography drives sex trafficking demand. As part of my recovery, I decided to fight sex trafficking. In doing so, I discovered that pornography was driving the demand side of sex trafficking to the point that there is an unbelievable sexual holocaust taking place throughout the world, which directly relates back to American device maker's arrogant and unlawful distribution of pornography. Instead of suiting up and kicking in doors to rescue trafficked women overseas, I have elected to use my personal experience to inflict a meaningful blow to sex trafficking through this litigation, so that no other man will have to go through the pain and suffering of losing their family due to easily accessible pornography. Some people may think that is funny, but their suppression of the truth is part of the problem.

¹⁹⁵ As a result of filing this lawsuit, I have received a host of threats. But as a combat veteran, I am fine with that. But what I am not ok with is the continuation of this relationship between tech companies and human traffickers, all of which is being passed off under the banner of freedom. There is no freedom in sex slavery for females or males. There is only suffering, shame, and regret. If the imposition of filters can save one person from entering into sex trafficking or if it can save one marriage, it is worth it.

The Defendants should join me in the fight against sex trafficking, becoming part of the solution, not part of the problem. We should not be on opposite sides of the table on this.

149. Pornography generates 97 billion a year: earning more than the NFL, NBA, and major league baseball combined.¹⁹⁶ The United States is responsible for approximately 15 billion of that total number. Three billion of that number connects with child exploitation. Pornography is liberalizing our National consciousness about sex for the worse, altering sexual orientations and proliferating a false set of beliefs that yields adverse classical conditioning. After viewing porn to the point where vanilla sex won't cut it any longer, viewers are dissolving into more extreme and bizarre forms of sexual charged content that is unnatural, destructive, and categorically perverted to get their fix. Meanwhile, groups like the ALA and Ms. Bittman are saying that viewing child pornography is no big deal, and they are fighting for that without understanding the realities of infant farms or what they are even doing. Pornography is unquestionably a drug that impacts the same areas of the brain as cocaine. The porn ingredient must be removed from the devices sold by the Defendants through the force of Judicial responsiveness to this complaint.

¹⁹⁶ Evil has been allowed to flourish, for the most part unchecked. In 2006, worldwide revenue from pornography was \$97 billion, more than Microsoft, Google, Amazon, eBay, Yahoo, Apple, and Netflix combined.

150. The addicting pornography had adverse impact on my brain.¹⁹⁷ I understand now why pornography is known as the crack cocaine of the moment. The ISPs and Device Makers are not allowing us the option to consent to how it is altering our beliefs and brains.¹⁹⁸

151. Another devastating impact of pornography exposure that I suffered from besides prospective sexual voyeurism was arousal addiction, where different kinds of beautiful females were desired. This makes lasting life giving relationship and security in those relationships difficult. Another traumatic impact of unwanted exposure to pornography was porn induced erectile dysfunction and sexual anorexia. Like dealing with slimy divorce lawyers, like Helen Rogers, ED and sexual anorexia are the gifts that keep on giving, while being birthed in emotional distress. According to the ANSA (Agenzia Nazionale Stampa Associata) news agency, young men who indulge in “excessive consumption” of Internet porn gradually become immune to explicit images. . . . Over time, this can lead to a loss of libido, impotence and a notion of sex that is totally divorced from real–life relations. “It starts with lower reactions to porn sites, then

¹⁹⁷ In her report before Congress, Dr. Jill Manning, who specializes in research and clinical work related to pornography and problematic sexual behavior, noted that studies show when a viewer encounters Internet pornography, it can have lasting negative or even traumatic effects on their sense of security and sexuality; that it promotes the belief that superior sexual satisfaction is attainable without having affection for one’s partner, thereby reinforcing the commoditization of sex and the objectification of humans; and that persons who have been exposed to online pornography have an increased risk for developing sexual compulsions and addictive behavior. Jill Manning, “Pornography’s Impact on Marriage & The Family,” [http:// www.heritage.org/research/testimony/pornographys-impact-on-marriage-amp-the-family](http://www.heritage.org/research/testimony/pornographys-impact-on-marriage-amp-the-family) (accessed June 6, 2014).

¹⁹⁸ Internet pornography is commonly referred to as ‘the drug of the new millennium’ and the ‘crack cocaine’ of sexual addictions. A *New York Magazine* article reported,:

“Scientists speculate that a dopamine–oxytocin combo is released in the brain during orgasm, acting as “biochemical love potion,” as behavioral therapist Andrea Kuszewski calls it. It’s the reason after having sex with someone, you’re probably more inclined to form an emotional attachment. . . . You don’t have to actually have sex in order to get those neurotransmitters firing. When you watch porn, “you’re bonding with it,” Kuszewski says. “And those chemicals make you want to keep coming back to have that feeling,” which allows men to not only get off on porn, but to potentially develop a neurological attachment to it. They can, in essence, date porn.”

there is a general drop in libido and in the end it becomes impossible to get an erection,” said Carlo Foresta, head of the Italian Society of Andrology and Sexual Medicine (SIAM).¹⁹⁹

152. The Defendants and their co-conspirators products amount to the crack pipe, and pornography is the drug to ingest. The device makers know without the crack pipe, the user cannot inhale the drugs. This is the reason why they are so pro-free flow of pornography. So that the user will become addicted to pornography and codependent on their delivery system. The Defendants products violate the spirit of drug paraphernalia statutes under TN ST § 39-17-425(a) (1), given their essential role in delivering the drug of porn.²⁰⁰

X. SECTION CAUSES OF ACTION

Do not be deceived: God is not mocked, for whatever one sows, that will he also reap. Galatians 6:7

COUNT ONE DEFENDANTS' LIABILITY FOR VIOLATIONS OF THE RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS STATUTE

Violation of Title 18, United States Code, Section 1962(c); Conducting the Affairs of the Enterprise Through a Pattern of Racketeering Activity

153. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully

¹⁹⁹ “Scientists: Too Much Internet Porn May Cause Impotence,” <http://www.foxnews.com/health/2011/02/25/scientists-internet-porn-cause-impotence/> (accessed June 6, 2014). Carlo Foresta team surveyed 28,000 Italian men, and the survey revealed that many became hooked on porn as early as 14, exhibiting symptoms of so-called “sexual anorexia” by the time they reached their mid-twenties.

²⁰⁰ TN ST § 39-17-425(a)(1) Except when used or possessed with the intent to use by a person authorized by this part and title 53, chapter 11, parts 3 and 4 to dispense, prescribe, manufacture or possess a controlled substance, it is unlawful for any person to use, or to possess with intent to use, drug paraphernalia to plant, propagate, cultivate, grow, harvest, manufacture, compound, convert, produce, process, prepare, test, analyze, pack, repack, store, contain, conceal, inject, ingest, inhale, or otherwise introduce into the human body a controlled substance or controlled substance analogue in violation of this part. Until filters are perfected and installed, the Defendant's products should be treated like a crack pipe.

herein. From at least the early 1990's and continuing up to and including the date of the filing of this complaint, in the District of Columbia and elsewhere, the defendants and others known, (Apple Inc., Hewlett-Packard, Verizon, Motorola, Microsoft, LG, Blackberry, Dell, Samsung Electronics, CenturyLink, Charter, Optimum, Frontier, Suddenlink, EarthLink, Cable One, NetZero, ect), and unknown, being persons employed by and associated with the Enterprise called the "porn compact," knowingly, and intentionally conduct and participate, directly and indirectly, in the conduct, management, and operation of the affairs of the aforementioned enterprise, which was engaged in, and the activities of which affected, interstate and foreign commerce, through a pattern of racketeering activity consisting of numerous acts of racketing in Tennessee and elsewhere, under 18 U.S.C. §§ 1461–1465 (relating to obscene matter); 18 U.S.C. §§ 1581–1592 (relating to peonage, slavery, and trafficking in persons), section [1341](#) (relating to mail fraud); and section [1343](#) (relating to wire fraud); including but not limited to, the acts of racketeering which have been identified here and will be proven at trial in in violation of 18 U. S. C. § 1962. See 18 U.S. Code § 1961(1).

The Enterprise Manner and Means

154. From at least the early 1990s, and continuing up to and including the date of the filing of this complaint, in Tennessee and elsewhere, defendants AT&T, Time Warner, Comcast, Cox, and others known and unknown, including agents and employees of defendants, collectively have constituted an "Enterprise," as that term is defined in 18 U.S.C. § 1961(4), that is, a group of business entities and individuals associated in fact, which was engaged in, and the activities of which affected, interstate commerce and foreign commerce. Each defendant participated in the operation and management of the Enterprise.

155. The Enterprise functioned as a continuing unit for more than 20 years to achieve shared goals through unlawful means including the following: (1) to preserve and enhance the market for Device Makers, ISPs and co-conspirators' own profits, regardless of the truth, the law, or the health consequences to the American people and their families; (2) to deceive consumers into starting and continuing to purchase filterless devices and routers by maintaining that there was an open question as to whether pornography was harmful, by scapegoating the internet, by scapegoating the content creators, by blaming consumers for their own exposure to pornography, by coloring their distribution of obscenity as a first amendment matter, despite the fact that defendants knew otherwise; (3) to deceive consumers into starting and continuing to interacting with porn by leaving them vulnerable to the onslaught of tactics by predatory pornographers by undertaking an obligation to do everything in its power proliferate porn addiction to encourage codependency on their products at the expense of the health and welfare of the consumer - catering to pornographers while marketing their products as family friendly; (4) to deceive consumers into becoming or staying addicted to pornography by maintaining that the porn they distribute is not addictive, despite the fact that defendants know it is; (5) to deceive consumers into becoming or staying addicted to pornography and codependent on their devices by manipulating the design of their product to cater to pornography access, while at the same time denying that they engaged in such manipulation; (6) to deceive consumers, particularly parents and children, by claiming that they did not market porn to children, while engaging in marketing and advertising with the intent of causing children and young adults into becoming lifetime internet porn addicts; (7) to mislead consumers that their products were smut

free following a few minor steps to create the appearance that the Defendant's were against porn, when nothing could be farther from the truth.

156. Upon information and belief, the Enterprise came into existence not later than 1991 at a secret meeting between Steve Jobs and Bill Gates at Job's house in Palo Alto, where they met to discuss the future of Microsoft.²⁰¹ The Enterprise was formed at meetings in at the Technology summits in Las Vegas that overlapped with the porn convention that was scheduled at the same time. There were meetings that took place in New York and Silicon Valley where the Enterprise was consummated. Other device makers, ISPs, and parasitic groups later joined and opted in to the Enterprise that was fundamentally started by Jobs and Gates. It can be accurately said that Bill Gates insatiable lust for money and power provided the gateway to a human trafficking epidemic due to the evil decision to distribute pornography at will, when this content should never have been readily available unless the user undertook steps to acquire access after providing proof of age.

157. The participants in this Enterprise have repeatedly utilized advertisements and promotions, and have made numerous other public statements through the mails and in broadcasts and other media, Congressional hearings, and other public appearances as part of a concerted and coordinated campaign to reaffirm their promise to sell "family friendly products" and to comply with the law. The Defendants created a false apprehension in the media of their true intent and nature. In participating in Congressional inquiries, like OTWG, the Enterprise maliciously advanced the "wait and see" narrative regarding porn's harmfulness, while fraudulently

²⁰¹<http://pandawhale.com/post/34779/steve-jobs-and-bill-gates-discuss-the-pcs-future-at-jobs-palo-alto-home-in-1991>

promoting the "blame the parents game." The Court should force the Defendants to amend their subliminal marketing slogan from "It's Your fault" to "It's our fault" in issuing the injunction. The Defendants have denied that their products contribute to divorce, broken homes, sex trafficking, sexual voyeurism, reproductive damage, mental health problems, reproductive problems, and domestic violence. Their false publications regarding the "freedom from porn campaign," "autonomous," and "removal of porn from devices" amount to violations under 18 U.S.C. §§ 1341 (mail fraud) and 1343 (wire fraud), which support their efforts in violating 18 U.S.C. §§ 1461–1465 (relating to obscene matter) and 18 U.S.C. §§ 1581–1592 (relating to peonage, slavery, and trafficking in persons), as part of an invalid money making scheme that is flagrantly illegal.²⁰² The Defendants know good and well that the pornography they distribute is ramping up the demand side of sex trafficking. But they do not care. It is time that we make them care, by making them follow the law.

²⁰² Another huge bastion of Apple's fraud is embodied when Steve Jobs began to champion "Freedom from porn." As one business journalist wrote, "Freedom from porn. Yep, freedom. The times they are a changing. The tech customer stated: 'I don't want 'freedom from porn. Porn is just fine!' To which Steve Jobs replied, 'You might care more about porn when you have kids...'" In the article, Apple expressly acknowledged its duty to protect kids from pornography. Yet, when faced with my lawsuit and the demands of the British Prime Minister to implement a solution to protect "kids" that Apple and Hewlett- Packard pretend to be so concerned about it has refused and gone on the attack - because compliance would disrupt their concert effort with pornographers to make these "kids" addicted to their products. Then the author went on to write a personal response to Steve Jobs' freedom from porn remark showing that he himself had been duped stating: "*parenting changes your perspective on many things. Having children, grandchildren or just knowing and loving other's children adds a whole new dimension to the way we view life. We want to shield our kids from the filth, the trashy side of the real world. If Steve Jobs is blocking porn, than I am buying Apple products from here on in. I think it's important to support the companies, the businesses and the people who are standing up for the things that you believe in. The best way to support any cause is to put your money where your mouth is, and purchase their products. I will support Apple in this latest endeavor. The question is: Will you?*"

Very obviously, Steve Jobs false posturing that he was taking the moral high ground by block porn had its desired effect on millions of people to include the sophisticated writer of the business article. The only problem is that the "freedom from porn" statement was a complete fabrication of the truth. Apple's products remained the worlds leading distribution of the most addicting kind of pornography ever introduced to the world. The Defendants are not computer sellers. They are drugs dealers who market to kids and falsely advertise to ensnare their customers to become codefendant on their brand of drugs.

158. The Enterprise has pursued a course of conduct of deceit and misrepresentation and conspiracy to defraud the public, to withhold from the public facts material to the decision to purchase and use their porn filled products, to promote and maintain sales of their devices, and the profits derived therefrom, as well as to shield themselves from public, judicial, and governmental scrutiny. The fraudulent, misleading and unlawful efforts of the Enterprise have continued from its inception to the present and threaten to continue into the future.

159. The participants in this Enterprise have repeatedly utilized advertisements and promotions, and have made numerous other public statements through the mails and in broadcasts and other media, Congressional hearings, and other public appearances as part of a concerted and coordinated campaign to reaffirm the family friendliness and safety of their products, to avoid civil liability, and to conceal their efforts to misrepresent, suppress, distort, and confuse the facts about the health dangers of the pornography they distribute, including pornography addiction.

160. The Enterprise has continued to misrepresent to the public the idea that it is the users duty to self-censor and pay for filtering, making the customers feel completely helpless and dehumanized. The Enterprise has set out to punish those who would seek to avoid pornography addiction because to do so interferes with their malicious business plan to make users attached. Upon information and belief, the Enterprise funded Planned Parenthood groups to encourage teenagers to access pornography on their products and to spread the porn gospel throughout society. Upon information and belief, the Enterprise funded groups to make fraudulent claims about pornography addiction being an "open question" as its harmfulness and addictiveness. The Defendants have suppressed development, testing, and marketing of products with preset filters that are activated, custom made to regulate their products, and password protected, which would

actually allow them to deliver on their promise to sell family friendly products. The Defendants have falsely misrepresented to the public and governmental bodies that filtering would be too expensive and too cumbersome to accomplish; only to then point to third party filtering companies to fix the defectiveness of their own machinery. Meanwhile, the Defendants know that this position is grossly untruthful and illogical. The Defendants know that the burden to filter rest on them, not the consumer. The Defendants know that they could easily send out filter updates as part of the routine software bundles that only they are in a position to update. The Supreme Court has effectively screamed at Congress to pass filter legislation, but Congress will not do it because Democracy is being hijacked by special interest groups and campaign contributions coming from the Enterprise.

161. At all relevant times, the Enterprise has existed separate and apart from Defendants' racketeering acts and their conspiracy to commit such acts. The Enterprise has an ascertainable structure and purpose beyond the scope and commission of defendants' predicate acts. It has a consensual decision making structure that is used to coordinate strategy, manipulate scientific data about porns harmfulness, misrepresent the law, use shame and pride as a weapon, and suppress the truth about their existing legal obligation to honor state and federal obscenity laws and the consequences of viewing the porn they distribute and otherwise further defendants' fraudulent scheme.

162. The Enterprise continues actively to disguise the nature of Defendants' wrongdoing and to conceal the Defendants' participation in the conduct of the Enterprise in order to avoid and/or minimize their exposure to criminal and civil penalties and damages. There are countless lobbying Groups like Citizens Internet Empowerment Coalition, the ALA, the ACLU, and the

Center for Democracy and Technology are funded by the Enterprise to allow them to continue to exploit the lack of enforcement over their repeated violations of obscenity laws.²⁰³

a. These groups served as a principal channel of communication among defendants to ensure that the companies continued to espouse the party line and to react to new threats to the industry and their scheme to pornify society.

b. They served to provide a uniform voice to propagate the Defendants' and their co-conspirators' false and misleading material statements about porn consumption and health, the Defendants' commitment to research, and other issues, while grossly abusing the first amendment to perpetrate crimes against humanity in the area of human trafficking.

c. The lobbying groups provided an "independent" front for defendants' activities. They literally engage in malicious intimidation tactics of Christian conservative groups and have been linked to encouraging targeting of groups like "Enough Is Enough" through the IRS.

d. They were mechanisms for enforcing the conspiracy and ensuring that all defendants continued to participate in the Enterprise. Defendants and/or their attorneys were in constant contact with each other and on the same page. The numerous committees and boards that exercised control over the Enterprise provided regular opportunities for defendants' agents to meet and to ensure that defendants were continuing to act in concert. The lobbying groups are controlled by the Tech companies. They are the mouthpiece of the porn industry, in fact, the tech

²⁰³ Internet Advertising Bureau, Association of Alternation Newsmedia, and the Center for Democracy and Technology are funded by the tech companies to oppose censorship of pornography on their products. Most recently, in October 2014, these groups have been hardcore opposed to the The SAVE Act, a landmark piece of legislation that easily passed the House, would severely penalize websites that display ads for child prostitutes – a major step in the fight against sex trafficking and child pornography.

companies are truthfully the porn industry of today. Hustler and Playboy are effectively obsolete, thanks to the Tech

companies endorsements of porn kingpins like Fabian Thylmann.²⁰⁴ Distribution aggregators like Mind Geek must be tied down. Thylmann makes Hefner look like nobody in comparison.

163. The "open and share model" has given rise to amateur porn sites like "youporn.com" where anyone can upload pornographic pictures at anytime. This influx of content has created the problems for Playboy in the same way that it caused problems for Sony and Universal Records (who I invite to intervene under rule 24 in this action). The traditional businesses cannot compete with "free" - content cannot be monetized and streaming revenue only goes to the publisher. The handful of Device Makers and ISPs are committing serious Antitrust violations as they themselves are becoming the pornography industry, print media, and the music business itself. They are getting away with murder - literally. Especially in the area of human trafficking networks, which their business model is advancing in exchange for huge financial returns. This circumstance is having devastating impact on the National and Global economy, as it cultivates a

²⁰⁴ Fabian Thylmann (born 5 June 1978 in Aachen, Germany) was the owner of some of the world's most heavily used pornography websites, via his company MindGeek, which has its headquarters in Luxembourg and offices in Hamburg, London, Los Angeles, Nicosia, and Montreal.[1] Combined, his sites generate sixteen billion hits per month, and consequently are among the most popular websites on the planet.[citation needed] Little is known of the reclusive Thylmann, other than he was born in 1978, is German, lives in Belgium, is married with two children, and is a computer programmer. His breakthrough came in the late 1990s when he developed software called NATS (Next-generation Affiliate Tracking Software), which linked up the vast number of internet pornography sites for the first time and enabled visitors to select sex films according to personal preference. He has only given one press interview ever, to the German edition of the Financial Times at a pornography trade fair in Las Vegas in 2011, which described him as 'The King of Porn'. At the time he welcomed the chance to "clear up rumours" and "dispel conspiracy theories" about his identity. "NATS was very easy to use and could do what the others couldn't. Our objective is actually rather banal, we want to create as many opportunities as possible for people to spend money." He has not spoken publicly since. Germany's Focus magazine claimed that he has revolutionised the business of pornography consumption by allowing the free viewing of pornographic video clips, while being paid for advertising pay-for-view pornographic sites.[full citation needed] His success has led to claims[by whom?] that he has crippled the traditional porn industry. In December 2012, he was extradited from Belgium to Germany on suspicion of tax evasion on the estimated £60 million annual profits his company allegedly makes. Thylmann did not contest the extradition order.

perpetrating culture. To suggest that it is unjust enrichment and immeasurable greed is the understatement of the century. Just like in the civil rights movement of 1964 thinking that the status quo will merely fix itself without deliberate action in the face of such horrific injustice on the large scale is offensive to the lessons of history. How is it that with all of our education and talents, we have allow this porn pandemic to come about?

164. By contributing and controlling lobbying groups to prevent censorship, (like Internet Advertising Bureau; Association of Alternation Newsmedia; the Center for Democracy and Technology; Free Speech Coalition; Planned Parenthood; the ACLU; and GLAAD) the defendants and other known and unknown lobbying groups have constituted an association-in-fact enterprise as defined in 18 U.S.C. § 1961(4).

165. On information and belief, by frequent and continuous communications among, and coordinated activities of, defendants and their agents that continue to the present day, defendants and others continue to constitute an association-in-fact enterprise as defined in 18 U.S.C. § 1961 (4).

COUNT TWO' VIOLATIONS OF TITLE 18, UNITED STATES CODE, SECTION 1962 (d); CONSPIRACY TO VIOLATE TITLE 18, UNITED STATES CODE, SECTION 1962 (c)

Conspiracy to Conduct the Affairs of the Enterprise Through a Pattern of Racketeering Activity

166. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. For the past two decades, up to and including the date filing this Complaint, in Tennessee,

Pennsylvania, and elsewhere, the Defendants, Comcast, Time Warner, Cox Communications, AT&T, and others known and unknown, being persons employed by and associated with the Enterprise did unlawfully, knowingly and intentionally combine, conspire, confederate, and agree together with each other, and with others whose names are both known and unknown, to conduct and participate, directly and indirectly, in the conduct of the affairs of the aforementioned Enterprise, which was engaged in, and the activities of which affected, interstate and foreign commerce, through a pattern of racketeering activity consisting of multiple acts indictable under 18 U.S.C. §§ 1341, 1343, 1461–1465, and 1581–1592 in violation of 18 U.S.C. § 1962(d).

167. Each defendant agreed that at least two acts of racketeering activity would be committed by a member of the conspiracy in furtherance of the conduct of the Enterprise. It was part of the conspiracy that defendants and their co-conspirators would commit numerous acts of racketeering activity in the conduct of the affairs of the Enterprise, including, but not limited to, the acts of racketeering set herein and will be proven at trial. The racketeering efforts harm me.

THE PATTERN OF RACKETEERING ACTIVITY

Steve Jobs "we do believe we have a moral responsibility to keep porn off the iPhone. Folks who want porn can buy and (sic) Android phone."

168. a. From at least the early 1990s, and continuing up to and including the date of the filing of this complaint, in Pennsylvania, Tennessee, and elsewhere, defendants and others known and unknown did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud, and obtain money and property from, members of the public by means of material false and fraudulent pretenses, representations, and promises, and omissions of material facts, knowing that the pretenses, representations, and promises, were false when made.

b. It was part of said scheme and artifice that the Device Makers would and did sell products for purchase by consumers that were represented to pose no proven substantial risk of porn addiction, and that were not causing addictive, and that porn consumption was a matter of free choice by adults, when in fact, unavoidable exposure to pornography constitutes a substantial health risks, that pornography is highly damaging and addictive, and that the Device Makers had targeted young adults, like myself, and children as "replacement porn addicts" for adult porn addicts who either reduced or ceased porn or had died.²⁰⁵ Whenever the members of the Enterprise did admit and acknowledge the harmfulness of pornography, they blamed everyone else but themselves for making the platform available. They also pretended to provide sham solutions knowing that they were inadequate.

c. It was further part of said scheme and artifice that defendants and their co-conspirators would and did maintain sales and profits of the Device Makers, by concealing, and suppressing material information regarding the health consequences associated with exposure of porn on filterless devices, including that pornography posed substantial mental health and reproductive risks, that device generated pornography is highly addictive, that they had the ability to manipulate and manipulated delivery to increase use and potency, and that the Device Makers and ISPs had targeted children as "replacement porn addicts" for adult porn users who either reduced or ceased porn due to erectile dysfunction or had died.

d. It was further part of said scheme and artifice that, in order to conceal the health risks of exposure of pornography and the addictiveness of pornography, defendants and their co-

²⁰⁵ Meanwhile, the Defendants and their co-conspirators have known and understood that self-censorship in the face of so much pornography is "itself an injury." That the onus to provide robust safety features was on them, and not their customers. The Defendants have made false and misleading statements to the media to hold objectors hostage.

conspirators would and did make false representations and misleading statements in national publications, would and did falsely represent that defendants would fund and conduct objective, scientific research, and disclose the results of such research, to resolve concerns about porn related injuries, would and did falsely represent that defendants did not target children for porn consumption, would and did suppress and destroy documents to hide adverse research results, would and did misrepresent and fail to disclose their ability to manipulate and the manipulation of pornography delivery and the addictive qualities of pornography, would and did conceal the availability of less hazardous products, and would and did misrepresent their actions to government personnel and others and in judicial proceedings. The Defendants lying to Congress during OTWG was legendary. Their false and misleading statement amounted to one amongst countless publications where the ISPs advanced the false narrative that monitoring pornography is a “parents job” and that parental controls in their current condition could make a device porn free. Parental controls on devices provide no safety provision for the individual user whether they be parents or otherwise. The IPS have their own obligation to provide filters in the same way that the Device Makers do. The devices are not sold to parents per se; they are sold to individuals causing the entire “parental control” scam to be rife with fraud and misrepresentation. The false premise of “parental controls” assumes that all parents are equal, that parents/adults are tech savvy, and that parental controls are effective, once activated on the device in question. It also assumes that the parental controls work without the presence of a third party to be the keeper of the password, when in truth parental controls are functionally inept and inadequate because it assumes the presence of an independent third party accountability system. At best, parental controls could provide some safety for non-existent guest accounts but afford no

accountability whatsoever for the primary account, which is the only one in existent when the device is sold to the user. This would be like an car manufacturer providing a potential seat belt for the back seats, but no seat belt for the driver. Parental controls as a safety feature are a complete sham and are not the filtering system that the Federal Courts were recommending in striking down COPA. Meanwhile, the ISPs are not providing any filtering safety options, when they can zone pornography to the unused ports.

e. It was further part of said scheme and artifice that defendants and their co-conspirators would seek to impair, impede, and defeat government authorities' ability to understand the actual risks of exposure to porn, its impact on sexual assault in the military, the impact on marriages, the increase in encouraging abortion, the increase in opening the door to the cultivation of same-sex conduct, the impact on the demand of sex trafficking, and the addictiveness of pornography, and to impair, impede, and defeat governmental efforts to regulate and control the manufacture and distribution of pornography through their devices, and to impair, impede, and defeat consumers and parties in litigation from learning the adverse health effects and addictiveness of pornography, in that defendants and their co-conspirators would and did attempt to cover up their knowledge of the adverse health risks of pornography, the addictiveness of pornography, and their efforts to recruit children to become porn addicts, and would and did misrepresent that adverse health effects of porn consumption and addictiveness were unknown or unproven; and would and did attempt to prevent to the public, Congress, courts and government officials from uncovering those activities.

f. It was further part of said scheme and artifice that defendants' communications directed toward government officials and courts would be and were designed to preserve and increase the market

for filterless products while concealing the deleterious health and social effects of exposure to the relentless tactics of predatory pornographers. Examples of such communications include defendants' communications with government agencies, and communications with congressional subcommittees, members, and staff, as well as their communications among themselves regarding what should not be disclosed to government agencies and to courts and Congress.

g. It was further a part of said scheme and artifice that defendants communicated to the public nationwide in newspapers, magazines, and other periodicals that were distributed through the mails, as well as through the broadcast media, to deceive the public. The Defendants' mailed the plaintiff and millions of other customers filterless devices through the mail, which failed to include any kind of warning regarding the addictiveness of pornography that their machine exposed customers to during their normal use.

h. It was further part of said scheme and artifice that defendants were taking the moral high ground in the pornography fight, when they are in bed with pornographers and themselves the mouthpiece for the porn industry that they are taking over. These falsities were advanced by mail and by interstate wire transmissions.

j. It was further part of said scheme and artifice that defendants and their co-conspirators would mail and otherwise distribute press releases and other public statements addressing public health concerns and commenting on particular research issues concerning pornography and the freedom to distribute any and all content regardless of the human rights violations that followed.

k. It was a further part of said scheme and artifice that defendants and their co-conspirators would and did misrepresent, conceal, and hide and cause to be misrepresented, concealed, and hidden, the purpose of, and acts done in furtherance of, the scheme to defraud.

l69. It was a further part of said scheme and artifice, and in furtherance thereof, that defendants would and did communicate with each other and with their co-conspirators and others, in person, by mail, and by telephone and other interstate and foreign wire facilities, regarding health effects of porn exposure, marital health research and research into the effects of pornography, and ways to suppress such information, and regarding ways to identify and target children for the sale of filterless products.

m. For the purpose of executing and attempting to execute the scheme and artifice described herein, defendants and their co-conspirators would and did: knowingly place and cause to be placed in any post office or authorized depository for mail matter, matters and things to be sent and delivered by the United States Postal Service (and its predecessor, the United States Post Office Department); took and received therefrom such matters and things; and knowingly caused to be delivered by mail according to the direction thereon, and at the place at which it is directed to be delivered by the person to whom it is addressed, any such matter and thing, in violation of 18 U.S.C. § 1341, including, but not limited to, the instances of racketeering set forth here and as will be established at trial. The Defendants broke obscenity laws and committed mail fraud by mailing filterless devices to customers to include mailing devices to myself. The Defendants and their co-conspirators have mailed millions of their filterless devices to customers under the presumption of safety, and in doing so, the defendant violated 1461–1465 and 1341.

n. For purposes of executing and attempting to execute that scheme and artifice, defendants and their co-conspirators would and did knowingly transmit and cause to be transmitted in interstate and foreign commerce by means of wire, radio and television communication writings, signs, signals, pictures and sounds (collectively "transmissions") in violation of 18 U.S.C. § 1343, including, but not limited to, the transmissions.

OBSCENITY VIOLATIONS AND RACKETEERING

170. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The Defendants and their co-conspirators committed thousands, and perhaps millions, of acts involving obscenity since the inception of the formation of the Enterprise. The Defendants' and their co-conspirators' acts of concealment took a number of forms.²⁰⁶ Virtually all of the Gonzo pornography websites that the Defendants make available violate the community standard in Nashville and all other cities.²⁰⁷ The community has a right to set standards of decency.

²⁰⁶ Under existing U.S. Code sections, traffic in obscenity is a felony offense, such as Title 18 of the U.S. Code, section 1461, making it a crime to knowingly mail obscenity, even for private use, or to mail advertisements for obscenity, section 1462, making it a crime to knowingly import, exploit, or domestically ship obscenity by common carrier via computer, cell phone, xbox, ground, air, water, satellite, Internet, phone, TV, or cable, et cetera, even for private use, section 1465, making it a crime to knowingly transport obscenity, for sale or distribution, across state lines or by any means or facility of interstate or foreign commerce, plus sections 2252 and 2252, making it a crime to knowingly transport, receive, or possess child pornography within, into, or out of the United States by any means, including computer, or even possess child pornography that has been so transported or transmitted, and sections 1961 through 1969, the RICO statutes, which make it a racketeering crime for those who knowingly use an enterprise in a pattern of Federal and State obscenity or child exploitation offenses.

²⁰⁷ If Eric Holder would do his job, any pornography that involves an erect genital or an ultimate sex act could be taken to a jury, as obscenity violations. All most all of the pornography that the Defendants distribute is illegal.

171. The "*Miller Test*" was announced by the court to provide judges and juries with legal guidelines for determining obscenity under both Federal and state laws.²⁰⁸ Unlike obscenity, Child Pornography is a more objective test, and consists of an unprotected visual depiction of a minor child under age 18 engaged in actual or simulated sexual conduct, including a lewd or lascivious exhibition of the genitals. It is a crime under Federal and State laws to knowingly make, send, receive, or possess child pornography.²⁰⁹

172. The Supreme Court of the United States has always held that obscenity is not protected speech under the Constitution and upheld the power of Congress and State Legislatures to prohibit obscenity from the streams of commerce. As the Court said in the famous Miller case in 1973, "This much has been categorically settled by the court, that obscene material is unprotected by the First Amendment." *Miller v. California*, 413 U.S. 15, at 23 (1973). The Court held that was true even for "consenting adults." *Paris Adult Theatre v. Slaton*, 413 U.S. 49, at 57-59 (1973). Almost 25 years later, the court reminded us that "Transmitting obscenity and child pornography, whether via the Internet or other means [such as a device sold by the Defendants],

²⁰⁸ (1) whether the average person, applying contemporary adult community standards, would find that the material, taken as a whole, appeals to a prurient interest in sex, *i.e.*, an erotic, lascivious, abnormal, unhealthy, degrading, shameful, or morbid interest in nudity, sex, or excretion; and (2) whether the average person, applying contemporary adult community standards, would find that the work depicts or describes, in a patently offensive way, sexual conduct, *i.e.*, "ultimate sexual acts, normal or perverted, actual or simulated; ... masturbation, excretory functions, and lewd exhibition of the genitals"; and sadomasochistic sexual abuse; and (3) whether a reasonable person would find that the work, taken as a whole, lacks serious literary, artistic, political, or scientific value. *See Miller: California*, 413 U.S. 15, at 24-25 (1973); *Smith v. United States*, 431 U.S. 291, at 300-02, 309 (1977); and *Pope v. Illinois*, 481 U.S. 497, at 500-01 (1987).

²⁰⁹ *See* 18 U.S.C. § 2256 and 2256A; *New York v. Ferber*, 458 US 747 (1982), *Osborne v. Ohio*, 495 US 103 (1990), *United States v. X-Citement Video, Inc.*, 115 S.Ct. 464 (1994). *See also United States v. Wiegand*, 812F2d 1239 (9th Cir. 1987), *cert. denied*, 484 US. 856 (19'67), *United States v. Knox*, 32 F3d 733 (3rd Cir. 1994), *cert. denied*, 115 S. Ct. 897 (1995)

is already illegal under federal law for both adults and juveniles." *Reno v. ACLU*, 521 U.S. 844, 117 S.Ct. 2329, at 2347, n 4 4 (1997).

173. In addition to obscenity and child pornography, there is also a third type of pornography that is criminalized as Harmful To Minors, which may include soft-core pornography, which may not be obscene for adults, as well as hard-core pornography that could be obscene even for adults. It is unlawful to knowingly sell or display such Harmful to Minors pornography to minor children under State laws and under Federal law as enacted in the Child Online Protection Act of 1998 (Called COPA, 47 US.C § 230). This is true even if the material is not obscene or unlawful for adults. So called "Harmful to Minors" or "Obscene For Minors" pornography is known as "variable obscenity" because the Supreme Court held that the test would be varied or modified to apply to the specific audience of minors to which it was directed or would reach. See *Ginsberg v. New York*, 390 US. 629 (1968), as modified by *Miller, Smith, Pope, supra*. See also *Commonwealth v. American Book sellers Ass'n*, 372S.E.2d6180/a. 1988), followed, *American Booksellers Ass'nv. Commonwealth of Va.*, 882 F2d 125 (4th Cir. 1989), *Crawford v. Lungren*, 96 F3d 380 (9th Cir. 1996), cert. denied, 117 S. Ct. 1249 (1997). Under the "Millerized-Ginsberg Test," pornography is "Harmful To Minors" or "Obscene For Minors" when it meets the following three prong test, as defined by statute, and properly construed by the courts, and judged in reference to the age group of minors in the intended and probable recipient audience: (1) taken as a whole and with respect to minors, appeals to a prurient interest in nudity, sex, or excretion, as judged by the average person, applying contemporary adult community standards with respect to what prurient appeal it would have for minors in the intended and probable recipient age group of minors; and (2) depicts or describes, in a patently offensive way with

respect to what is suitable for minors, an actual or simulated sexual act or sexual contact, actual or simulated normal or perverted sexual acts, or a lewd exhibition of the genitals, as judged by the average person, applying contemporary adult community standards with respect to what would be patently offensive for minors in the intended and probable recipient age group of minors; and (3) taken as a whole, lacks serious literary, artistic, political, or scientific value for minors, as judged by a reasonable person with respect to what would have serious value as to minors in the age groups of the intended and probable recipient audience of minors.

174. In addition to criminalizing traffic in obscenity and child pornography for both adults and minors, Congress has acted to provide further provisions to protect children from exposure to adult and child pornography, starting with COPA in 1998 to stop commercial porn Websites from showing free teaser samples of pornographic pictures on their front pages and to require an adult identifier such as a PIN or credit card number to exclude minors. The idea of giving out "free samples of porn" is no different than a Tobacco manufacturer passing out free cigarettes to children on a playground. Kids and young males are being targets, and I am asking the Court to do something about it. Congress also required federally subsidized schools and libraries to use Internet filters to attempt to restrict adult access to visual images of Obscenity, i.e. hard-core pornography, and Child Pornography, i.e. sexually explicit images of minors, and to also try to block pornography that is harmful to Minors, such as hard and soft core pornography on terminals while used by minors under 17, as part of the Children's Internet Protection Act of 2000, which was actually upheld by the Supreme Court in overruling the challenges by the American Library Association and ACLU against using filters to block pornography on Federally funded computers in public libraries and schools. *United States v. American Library Ass'n*,

529 U.S. ___, 123 S.Ct. 2297 (2003). Finally, also as part of the PROTECT Act of 2003, Congress amended the Communications Decency Act of 1996, the famous CDA that began Congressional efforts to rein in pornography on the Internet, in light of the Court's 1997 decision in *Reno v. ACLU*, and thereby re-instituted section 223 of Title 47 of the U.S. Code to require Internet sites and providers to take good faith steps to prevent the knowing display to minors of obscenity or child pornography. Those laws, described above, defined by Supreme Court decisions, and enacted and re-enacted by Congress and then enacted by state legislatures across the Country, are available for law enforcement, in our courts, in our communities, in our lifetimes (as in immediately).

175. It cannot be said that Congress has not given law enforcement the tools to protect the public from the harms of illegal pornography, and the intent is clear to continue to maintain and improve those laws for the good of society and the protection of victims of pornography. (It cannot be said that the Defendants do not have the technology to sell their products with preset filters, but it can be said that they are engaging in criminal misconduct, fraud, and false advertising). It has historically been essential to preserve respect for the laws of public morality, and to do as the Supreme Court said was the "right of the Nation and of the States to maintain a decent society." History has taught us that an immoral Nation that turns its back on Biblical principles and infuses hypocrisy into its laws will not survive.²¹⁰

²¹⁰ In order to protect the next generation of children, women, and men from harmful pornography, obscenity laws, can be persistently and consistently enforced against all classes of offenders who violate our laws and against all classes of unprotected pornography that are prohibited by those laws. This can be done by the prosecutors and police who are charged in our communities and our Country with the duty and privilege to enforce those Federal and State laws for the good of all our children and families.

176. The Defendants and their co-conspirators have a duty not to distribute or expose citizens to obscene content that violate the community standard. The Defendants knowingly distribute millions of Gonzo Porn images and websites into the communities in a manner that offends state and federal obscenity laws. The Defendants and their co-conspirators did nothing to disrupt and prevent the consumers exposure to obscene material that they distribute. Instead, they wrongfully placed the onus on the customer to find a solution or be forced to navigate through the obscene materials that expose themselves to the customer.

177. With every sale, the Defendants and their co-conspirators violate the state shield law and display laws, under T. C. A. § 39-17-914. All 50 states have similar shield laws in effect that the Defendants and their co-conspirators are breaking them with every sale.²¹¹ All vendors in the state of Tennessee are required to sell their adult products behind a barrier. This is to protect

²¹¹ Ariz. Rev. Stat. Ann. ss 13-3501 to-3507 (Supp. 1986); Colo. Rev. Stat. ss 18-7-501,-502 (Supp. 1984) (held unconstitutional); Fla. Stat. Ann. ss 847.0125, .013 (West 1994); Ga. Code Ann. ss 16-12-102,-103 (1992) (held unconstitutional); Ind. Code Ann. s 35-49-3-3 (West 1986); Me. Rev. Stat. Ann. tit. 17, ss 2911, 2912 (West 1983 & Supp. 1995); Miss. Code Ann. s 97-5-27 (1994); Mo. Ann. Stat. ss 573.010, .060 (Vernon 1995); Mont. Code Ann. s 45-8-201 (1995); N.C. Gen. Stat. s 14-190.14 (1986); N.D. Cent. Code s 12.1-27.1-03.1 (1995); 18 Pa. Cons. Stat. Ann. s 5903 (1983 & Supp. 1995); R.I. Gen. Laws s 11-31-10 (Supp. 1986); S.C. Code Ann. ss 16-15-260,-290,-390 (Law. Co-op. 1985); S.D. Codified Laws Ann. ss 22-24-27,-29.1 (1979 & Supp. 1995); Tenn. Code Ann. s 39-17-914 (1991); Utah Code Ann. ss 76-10-1227,-1228 (1995); Vt. Stat. Ann. tit. 13, s 2804b (Supp. 1995). Marion D. Hefner, *"Roast Pigs" and Miller-Light: Variable Obscenity in the Nineties*, 1996 U. Ill. L. Rev. 843, 882 (1996). Ga Code Ann S 16-12-102(1) (Michie 1992). See also Ala Stat SS 13A-12-200.1(3), 13A-12-200.5 (1994) (probably prohibiting only display for sale); Ariz Rev Stat Ann S 13-3507 (West 1989) (prohibiting any display in any "place where minors are invited as part of the general public"); Fla Stat Ann S 847.0125 (West 1994) (prohibiting only display for sale); Ind Code Ann S 35-49-3-3(2) (West 1995) (prohibiting any display "in an area to which minors have visual, auditory, or physical access"); Kan Stat Ann S 21-4301c(a)(1) (1988) (prohibiting display in commercial establishments only); La Rev Stat Ann S 14:91.11 (West 1995) (prohibiting any display "at a newsstand or any other commercial establishment which is open to persons under the age of seventeen years"); Minn Stat Ann S 617.293, subd 2(a) (West 1987 & Supp 1996) (prohibiting commercial display); NM Stat Ann S 30-37-2.1 (1978 & Supp 1995) (prohibiting display only while offering for sale, "in a retail establishment open to the general public," and "in such a way that it is on open display to, or within the convenient reach of, minors who may frequent the retail establishment"); NC Gen Stat S 14-190.14(a) (1993) (prohibiting display in commercial establishments only); Okla Stat Ann SS 1040.75, 1040.76 (West 1983 & Supp 1996) (prohibiting all display, "including but not limited to . . . commercial establishment(s)"); Tenn Code Ann S 39-17-914(a) (1991) (prohibiting display for sale or rent); Tex Penal Code Ann S 43.24 (Vernon 1991) (prohibiting all display, whenever person is "reckless about whether a minor is present who will be offended or alarmed by the display"); 13 Vt Stat Ann SS 2801(8), 2804a (Equity 1971 & Supp 1995) (prohibiting display "for advertising purposes"). Eugene Volokh, *Freedom of Speech in Cyberspace from the Listener's Perspective: Private Speech Restrictions, Libel, State Action, Harassment, and Sex*, 1996 U. Chi. Legal F. 377, 436 (1996)

adults and children alike from the allure of damaging content inside “girlie magazines.” The Defendants and their co-conspirators’ products amount to portable extensions of the retail store. The Defendants have a legal obligation to keep all of the pornographic materials within their device/store behind barriers that can only be removed if the purchaser is 18 and asks that the retailer remove the barrier. The Defendants and their co-conspirators disregarded the law and it caused injury. The Defendants deserve no special exception in making sure their products comply with shield laws.

178. The Defendants and their co-conspirators mailed filterless products in the mail to myself and millions of other customers, violating 18 U.S. Code § 1461.²¹² These products contain the world’s largest bank of obscenity ever assembled since the inception of mankind. The Tech companies mail these products out without warning that the customer will likely be exposed to addicting pornography. The Tech companies do nothing to remove the obscene content from the products they mail out, which causes them to violate Federal obscenity laws.

²¹² 18 U.S. Code § 1461 reads: Every obscene, lewd, lascivious, indecent, filthy or vile article, matter, thing, device, or substance; and—Is declared to be nonmailable matter and shall not be conveyed in the mails or delivered from any post office or by any letter carrier. Whoever knowingly uses the mails for the mailing, carriage in the mails, or delivery of anything declared by this section or section 3001 (e) of title 39 to be nonmailable, or knowingly causes to be delivered by mail according to the direction thereon, or at the place at which it is directed to be delivered by the person to whom it is addressed, or knowingly takes any such thing from the mails for the purpose of circulating or disposing thereof, or of aiding in the circulation or disposition thereof, shall be fined under this title or imprisoned not more than five years, or both, for the first such offense, and shall be fined under this title or imprisoned not more than ten years, or both, for each such offense thereafter. The term “indecent”, as used in this section includes matter of a character tending to incite arson, murder, or assassination.

209. The Defendants engaged in racketeering in violation of obscenity laws by distributing misleading domain names, like F!@34book.com, watersport.com, and boyz.com under 18 U.S.C.A. § 2252B.²¹³ I am a victim of misleading domain names.

179. I and millions of other customers did not merely “stumble” onto pornography.

Pornographers smelled us out and hunted us down with the encouragement, authorization, and help of the Defendants and their co-conspirators thanks to the operational plans of the enterprise. This occurred as I was merely using the device as intended. Misleading domain names was one of the ways that the pornographers roped me and millions of others with unwanted pornography addiction.

180. All of the Device Makers have come together and agreed not to honor obscenity laws in hopes that none of them could be held accountable as they breed porn addiction and co-dependency on their products. The Defendants formed and Enterprise, molested the law, and caused a sexual holocaust, and now they must be disgorged of all profits. Tech companies will come and go, but humanity is here to stay. The tech companies must be taught a lesson about

²¹³ 18 U.S.C.A. § 2252B: Misleading domain names on the Internet states: (a) Whoever knowingly uses a misleading domain name on the Internet with the intent to deceive a person into viewing material constituting obscenity shall be fined under this title or imprisoned not more than 2 years, or both.(b) Whoever knowingly uses a misleading domain name on the Internet with the intent to deceive a minor into viewing material that is harmful to minors on the Internet shall be fined under this title or imprisoned not more than 10 years, or both.(c) For the purposes of this section, a domain name that includes a word or words to indicate the sexual content of the site, such as “sex” or “porn”, is not misleading.(d) For the purposes of this section, the term “material that is harmful to minors” means any communication, consisting of nudity, sex, or excretion, that, taken as a whole and with reference to its context--(1) predominantly appeals to a prurient interest of minors;(2) is patently offensive to prevailing standards in the adult community as a whole with respect to what is suitable material for minors; and(3) lacks serious literary, artistic, political, or scientific value for minors.(e) For the purposes of subsection (d), the term “sex” means acts of masturbation, sexual intercourse, or physical contact with a person's genitals, or the condition of human male or female genitals when in a state of sexual stimulation or arousal.

honoring the law. For the redemptive sake of American History, the Tech companies should be hit hard, so they can start again, only this time with the law in mind.²¹⁴

181. Will someone please explain to me why person under 18 year olds cannot be admitted into R rated movies, under Tenn. Code Ann. § 39--17--907,²¹⁵ and why they cannot entered strip clubs, under Tenn. Code Ann. § 7--51--1113,²¹⁶ but they can buy filterless devices from Tech companies and be exposed to the worlds greatest bank of pornography assembled since mankind? There is no excuse for this, and the Defendants know it. Consumers are walking around with x-rated theaters in their pockets, which is causing sexual and spiritual crisis. The Defendants are making a mockery of our law and assaulting faith, decency, and marriage for selfish reasons that are grossly illegal. The Enterprise is not providing benefits to society in making pornography available. It has to come to terms with the fact that their CEOs are not God, that humans are spiritual beings, and that viewing pornography violates the givenness of our nature and subverts human flourishing. The Court has an obligation to push pornography back underground.

RACKETEERING AND SEX TRAFFICKING

²¹⁴ Just because Nazi Doctors conducted unlawful experiments on humans that provide the medical field with insights does not mean that such practices should be tolerated or allowed.

²¹⁵ Tenn. Code Ann. § 39-17-907 "No minor under the age of eighteen (18) years old may be admitted to a movie theatre if the movie has been found to be "harmful to minors" pursuant to § 39-17-901. It is a deceptive practice under title 47, chapter 18, part 1, to advertise or promote a motion picture as having a rating other than the rating that has been assigned to it. (c) A violation of this section is a Class A misdemeanor."

²¹⁶ Tenn. Code Ann. § 7--51--1113"(d) An operator shall be responsible for supervising the conduct of all entertainers and employees while on the licensed premises, and shall exercise due diligence in taking reasonable efforts to prevent acts or omissions of any entertainers or employees constituting a violation of this part, with the operator's failure to reasonably fulfill this duty constituting a ground for determining whether the operator's license shall be revoked, suspended or renewed. (e) No employee of an adult-oriented establishment shall allow any minor to loiter around or to frequent an adult-oriented establishment or to allow any minor to view adult entertainment as defined in this part."

182. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. Of all of the most disturbing topics in the lawsuit, this one takes the cake - trafficking. ISPs do not provide filters because they are competing. They are competing in this manner due to the lack of regulation. What has transpired is a sexual holocaust. The Government is itself partly responsible for that due to its lack of enforcement of obscenity laws on ISPs and Device Makers because of a liberalized Democrat agenda that is grossly unlawful.

183. "Sex is a product, and the body is a commodity." That is the message of porn culture cultivated by the ISPs and Device Makers. If it is a product you can sell it, and if you can sell it, you can steal it. Selling it is the sexual exploitation industry, and stealing it sexual violence. As we have seen with the music business, given the options between paying and taking for free - free wins out.

184. As confirmed by the declaration from M.A.T.H. (mothers against trafficking humans), the Defendants know that the pornography they distribute is proliferating the demand side of human trafficking. The Defendants filterless products are the centerpiece of a human trafficking prostitution problem the likes of which we have never seen. The Defendants are profiteering along with the human trafficker because of their disregard for the law and indifferent to human rights.

What pornified Jons thinking? They have a greater desire for sex without emotional involvement. They have a greater acceptance of sex outside of marriage for married individuals; they have a greater acceptance of sex before marriage; they are less child centered during marriage; they are more williing to have sex with 13-14 year olds; they are more sexually attracted to children, they

are less likely to think about pornography needs to be restricted from children. Pornography distributed by the Defendants and their co-conspirators are creating the demand and that makes them culpable in sex trafficking.

185. Sexual exploitation industry is a seamless interconnected continuum. Pornography is connected with all other problems of sexual exploitation. You cannot draw a line, and say this is separate from that one. Pornography is visual invasion for money. Strip clubs are live visual invasion for money. Prostitution is live, physical, and visual invasion for money. Rape is live visual and physical exploitation by force. Child rape is live visual and physical invasion of a child by force. Sexual exploitation industry is sexual abuse for money. Sexual violence is sexual abuse by force. These are not that different. They are all cut from the same cloth. The ACLU, the ALA, Ms. Bittman, divorce lawyers like Helen Rogers, some assistant district attorneys are part of that mix because they enable it and prosecute and persecute the people who speak out against it. The Defendants are at the head of that continuum.

186. Just like the getaway driver in a bank robbery, the Tech companies are culpable for being the deliver and driver of the human trafficking enterprise.²¹⁷ Steve Jobs and Bill Gates are themselves the paramount groomers for the sex trafficking industry due to their contempt for humanity and the law itself.²¹⁸ The Defendants and their co-conspirators know that they are violation obscenity laws themselves and that so are the predatory pornographers they invite,

²¹⁷ At trial, in *Johnson v. Williams* U.S. February 20, 2013 133 S.Ct. 1088, Williams admitted that she had served as the getaway driver but claimed that she did not know that her friends were going to rob the liquor store at the particular time in question. Instead, she contended that the three friends had agreed only that they would “case” the store and would possibly return later that evening to rob it. The State countered that, regardless of whether Williams knew precisely when and where the robbery was to take place, she had agreed to help commit a robbery and that this was sufficient to provide the predicate for felony murder under California law.

²¹⁸ Consent is across a continuum, and once you destroy someone psychologically they are not consenting any more. Pornography helps with that process.

encourage, and support in violating their customers. The Defendants and their co-conspirators are liable for the criminal acts of third parties. Because the Defendants have wilfully refused to filter, they must be held civilly liable for the criminal acts of third parties to include human traffickers and child porn content creators.²¹⁹

187. If the Defendants had respect for copyright owners, the music business would not be in the state that it is in. If the Defendants have respect for human rights, they would have sold their products with filters from the start. Instead, they have caused a human trafficking epidemic, only to then have the audacity to blame their customers for intentional failures and fraud that belong to the Enterprise. As the cherry on top, the Defendants and their co-defendants make false freedom of speech arguments, when what they are advancing is slavery in its worst form - sex slavery. For the sakes of millions of victims of porn, failed marriages, child abuse, domestic violence, and sex slavery, the Defendants and their co-conspirators deserved to be completely bankrupted. Civilization deserves better. The Tech companies cannot be said to advance modernization when they inspire should destructive savagery. Future generations depend on our responsiveness. Companies come and go. Whenever slavery rears its ugly head, no matter what the form it takes, its masters must be crushed by the force of law.²²⁰ Our country waged a civil war over slavery. The 13th amendment and the transcultural law demands as much, if we are to call ourselves Americans. Both the slave and the slave owner were destroyed by slavery.

²¹⁹ The plaintiff undertakes to find support for her position in the law regarding the duty of shopping center operators to third parties for the criminal acts of strangers, *Cornpropst v. Sloan*, 528 S.W.2d 188 (Tenn.1975);; the duty of landlords to tenants for the criminal acts of strangers, *Tedder v. Raskin*, 728 S.W.2d 343 (Tenn.App. 1987);; the duty of innkeepers (hotel or motel operators) to registered guests for the criminal acts of strangers, *Zang v. Leonard*, 643 S.W.2d 657 (Tenn.App.1982);; and the duty of “condominium owners' associations” to members for the criminal acts of strangers, *Francis T. v. Village Green Owners Ass'n.*, 42 Cal.3d 490, 229 Cal.Rptr. 456, 723 P.2d 573 (1986).” According to the complaint, the predatory pornographers engage in what amounts to an unlawful cyber breaking and entering in a scenario that the Defendants cultivated because they stand to get the largest kick back of all for having masterminded the criminal affair, perpetrating crimes against a public that refuses to think.

²²⁰ “*Always evil will look to find a foothold in this world.*” Gandalf *The Hobbit: An Unexpected Journey* (2012)

COUNT THREE (STRICT LIABILITY) PRODUCTS LIABILITY (DEFECTIVE DESIGN; FAILURE TO WARN) T.C.A. § 29-28-101 et seq.

188. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. Design defects occur where the product design is inherently dangerous or useless (and hence defective) no matter how carefully manufactured; the product failed to satisfy ordinary consumer expectations as to what constitutes a safe product. The risks of the product outweigh its benefits.

189. Defendant, at all times material to this action, designed, manufactured, distributed and/or sold the dangerous laptop computers and phones and placed such product into the market. The defective devices designed, manufactured, distributed, and/or sold by Defendant are defective and unreasonably dangerous. The IPS router reached Plaintiff without substantial change in the condition in which the products were designed, manufactured, distributed, and/or sold by Defendant.

190. Defendant owed a duty of care to Plaintiff to manufacture, distribute and sell routers and services that were free from defects and fit for their intended purposes. Defendant breached this duty to Plaintiff by failing to sell its products and services that were free from defects and fit for their intended purposes.

191. The defect in the router and services was the direct and proximate cause of the injury and damages suffered by Plaintiff. Through a collective agreement between similarly situated device makers, retailers, and pornographers, the Defendants set out to violate obscenity laws and knowingly distribute addicting pornographic content in extreme bad faith with the malicious intent of causing their customers to become codependent on their products and services.

192. The executive branch turned a blind eye to this violation of the law, due to political campaign contributions, which played an essential part in the injury inflicted onto the Plaintiffs.

COUNT FOUR: PRODUCTS LIABILITY (DEFECTIVE DESIGN; FAILURE TO WARN)

193. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. Plaintiff avers that the retail and manufacture Defendants, by processing, manufacturing or furnishing electronic devices that allowed unfiltered access to addicting content that was a significant and substantial health risk to the public at large, and more particular, to the Plaintiff, which violated the Tennessee Products Liability Act of 1978, T.C.A. § 29-28-101, et seq. T.C.A. § 29-28-105 provides that manufacturers, processors, or finishers who provide products which are unreasonably dangerous are held strictly liable for any injury to a person caused by that product.

194. The Defendants knowingly sold devices that gave their customers, to include the Plaintiff, exposure to harmful content that they knew could cause addiction and undue extreme infringement onto the biological chemical predisposition adversely altering internalize constitution causing the quality of the customers' lives to diminish. The Defendants could have taken a few easy steps to protect the Plaintiff from coming in contact with unwanted materials by selling the product on "safe mode" but failed to do so because they are irresponsible, greedy, and collectively indifferent to the welfare of their customers, sincerely believing that they are above the law. (If the Defendants can take the time to install software that allows their products to connect to the internet, they can take the time to install software that permits them to comply

with obscenity laws - improving the safety of their products and eradicating their false advertisement.

195. As manufacturer, processor, or furnisher of a device that allowed the Plaintiff to access addicting content without warning, the Defendants processed a finished product which was unreasonably dangerous or defective pursuant to T.C.A. § 29-28-102(2)(8) inasmuch as the danger of stumbling upon pornography that causes addiction was not one that would have been contemplated by the ordinary consumer and inasmuch, as the content accessible through the use of the computers proved it to be defective or in a dangerous condition that it would not have been furnished to the public by a reasonable prudent manufacturer, processor, or furnisher.

196. The Defendants sold computers to the consumer with software to access the internet without any filters to block addicting pornography. They failed to provide the Plaintiff with any warning that viewing pornography online could be psychologically harmful and addicting, and lead to a decrease quality of life. The Defendants made intentionally misleading truth claims, as part of a pimping scheme of their own that mirrors the mindset of pornographers.

197. The devices were in an unsafe condition without having installed filtering porn software or control settings that block porn at the time it left the manufacturing plants. If they were not so greedy, dishonest, and perverted, they would have ensured that all of their products did not leave the manufacturing plant without being set to opt out pornography.

198. The Plaintiff avers that the injuries suffered were a direct and proximate result of the unreasonably dangerous or defective condition of the products created by the manufactures and the other Defendants in the absence of pre-set filters upon sale. The Defendants knew the damaging and addictive qualities of pornography and are liable and answerable to the Plaintiff for the injuries suffered.

**COUNT FIVE SIMPLE NEGLIGENCE - SHIFTING THE BURDEN TO SELF-CENSOR
ON THE BUYER**

199. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. Of all of the causes of action, this one might be the simplest and the most important. The Defendants have a burden to block pornography on their devices. The defendants failed to meet that burden and shifted responsibility onto the purchaser to adjust their products to make them safe. This burden shifting caused the injury of the Plaintiff and millions of other users.

200. The Defendants and their co-conspirators had a duty to sell their products with preset filters that were activated that made reasonable attempts to block pornography. The Defendants failed to honor this duty because they know that pornography is addicting and good for their business. The Defendants wrongfully placed the filter responsibility on the consumers, expecting the consumer to filter themselves knowing this was unfair and unrealistic. The Defendants and their co-conspirators could see the danger that they placed their customers in. The Defendants and their co-conspirators were aware of the aggressive nature of pornographers, the addictiveness of their content, and the harm it would cause their customers. The Defendants placed the burden on the purchaser to self-censor in bad faith. To require consumers to self-censor, given the modern

day circumstances online, is damaging. The Defendants have insider knowledge which makes them in the best position to provide filters that will make reasonable attempts to block pornography. The Defendants are aware of the harm that could befall their customers upon encountering the obscenity they distribute. The Plaintiff was personally injured because the Defendants' and their co-conspirators refusal to provide safety features and a choice as to whether predatory pornographers could access me. The Defendants and their co-conspirators are liable for the damages and injuries that followed.

**COUNT SIX: BREACH OF THE DUTY OF GOOD FAITH AND FAIR DEALING
(NEGLIGENT FAILURE TO TEST AND WARN, NEGLIGENT FAILURE TO FILTER,
STRICT LIABILITY)**

201. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. A special relationship existed between the manufacturer/retailer and the Plaintiff given the advanced technology involved. The Plaintiff expected that the manufacture and retail Defendants would honor the laws, but they did not. The Plaintiff also expected the Defendants to sell products that are absolutely safe and that would not expose him to addiction. The Defendants were selling advance technological machinery and had received special training and certifications that the Plaintiff had not acquired. The Plaintiff was fraudulently induced to enter into a contract with the Defendants through their false advertising initiatives. The Plaintiff was never warned of the defects in the Defendants products. The Defendants did not tell him about the addictive qualities of the pornography that they knew he would be subjected to, given their secretive relationship with predatory pornographic content providers, who they protect. The

aggrieving party was in a superior and entrusted position. The Defendants engaged in grievous and perfidious misconduct in extreme bad faith in breaching the contract in unconscionable ways for their collective benefit. The Plaintiff suffered personal, financial, health, relational, and emotional injuries as a result and the quality of his life greatly diminished.

COUNT SEVEN: RES IPSA LOQUITUR RELATING TO PERSONAL INJURY

(NEGLIGENT FAILURE TO WARN, NEGLIGENT FAILURE TO TEST, FRAUD, STRICT LIABILITY, IMPROPER BURDEN SHIFTING, FAILURE TO FOLLOW OBSCENITY LAWS)

202. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The Defendants (individually and collectively) have a "duty" to act "reasonably." The Defendants breached that duty in shifting the burden on the Plaintiff to seek out third party filtering solutions and personally improve the safety and functionality of the Defendants' own products, which are in persistent state of violating obscenity laws.

203. It is unreasonable for the Defendants to place a burden on their customers who do not want inadvertently come in contact with pornography to have the burden to installing filtering software. The consumers deserve a choice as to whether they want to be exposed to pornography. The Defendants maliciously failed to provide that choice based on their own political and greedy agenda. It is unreasonable for the Defendants to distribute pornography into our homes and onto our persons in violation of state and federal obscenity laws. It is unreasonable for the Defendants to expect their customers to simply abdicate to the furtherance of criminal enterprise.

204. The Defendants are aware of the amount of pornography online and how internet marketing companies are attempting to entice males to get hooked on porn. (See the Witherspoon Institute Report). The Defendants are aware that pornography is linked to human trafficking and that it is

proliferating the demand side. There is something unreasonable with the Defendants encouraging human trafficking and forcing their customers to do the same. There is something inherently wrong with not allowing the customer to choose whether or not he wants to be exposed to pornography or not. There is something inherently wrong with shifting the onus onto the Plaintiff to self-censor against obscenity. The lack of choice in the matter is inherently wrong.

205. The Defendants and their co-conspirators are aware that pornography is addicting. And yet there is something inherently wrong with the Defendants' concealment of this knowledge and their refusal to warn or to protect their customers from unwanted addiction. Instead, the Defendants have engaged in systematic partnering with pornographers to maximize exposure to porn to cultivate codependency and maximized profits.²²¹ There is something inherently wrong with the Defendants concealment of knowledge and failure to warn.

206. There is something inherently wrong with the Defendants' and their co-conspirators efforts to "blame the parents" and users in the same way that the auto-manufacturers used to blame "the nut behind the wheel." Common sense and the evidence tells us that the Tech companies have formed a fraudulent conspiracy that takes plays from the auto-industry and the Tobacco Industry. There is something inherently wrong with not forcing them to meet the same fate.

There is something inherently wrong with the Tech companies targeting children and then not providing them with a safe environment.

²²¹ It used to be the case that it took time, money, and expense to garner pornography. Now it takes time money and expense to avoid it on the Defendant's device, which is an unreasonable and unjust circumstance created by the Defendants due to their kowtowing to the idol of greed and disregard for the public's health. Something about that scenario is inherently wrong on its face, provoking the need for judicial rectification under *res ipsa*. As as proven in the abolition of slavery, there is more to life than making money; their is the duty for us to take care of one another and protect our fellow man from harm, destruction, and suffering - pointing one another towards the truth. Money does not make us happy in the long run. We must help each other as a people thrive and money takes care of itself. The Defendants have an obligation to preserve the sanctity of marriage, not trample on it for personal profit through a complex perverted fraud scheme. I am as concerned for the Defendant's families as I am for everyone else's.

207. There is something inherently wrong with the Defendants pointing to third parties to provide filters, when they are in the best position to custom design filters in light of their insider knowledge. They also have the ability to send out filter updates.

239. There is something inherently wrong with not making the Defendants sell their products in a manner that honors the display obscenity laws. Their products amount to extensions of the retail store. Their products amount to handheld stores themselves and are. The Defendants should be subjected to selling their products with preset filters that form a shield around pornography in the same way that bricks and mortar stores are required. Every time the Defendants allows pornographic information to flow into a home without filters options, the Defendant violates T. C. A. § 39-17-914.

208. There is something inherently wrong with the lack of leadership by the United States Government to break up the Enterprise at play here when there is overwhelming evidence that pornography and human trafficking are interconnected. There is something inherently wrong with allowing tech companies to sell filterless devices which expose customers to criminal opportunities, only to prosecute them without holding also holding the tech companies culpable

for their essential role in the criminal misconduct.²²² There is something inherently wrong about the lack of consent as to what viewing pornographic images does to the viewer.

209. There is something inherently wrong with the Tech companies misleading the public that this matter falls within the area of free speech when it does not. There is something wrong in using liberty rhetoric and special technical knowledge to eliminate the choice to be free from pornography.

210. The Defendants have a duty to honor child obscenity laws and there is something inherently wrong with allowing minors and adults to leave their stores with their products without filters that block obscene content that offend the community standards. After leaving the store with a filterless product an adult or minor can be accessing torture porn websites within minutes. There is something wrong with how the Defendants and their co-conspirators allow predatory pornographers to target kids.

²²² The Defendants knew that Plaintiff is attached to beautiful women by sight, as all males are. The Defendants took advantage of that knowledge through their porn compact with device makers and predatory pornographers, who were permitted to bombard the Plaintiff with porn hooks. Requiring those who want to avoid seeing pornography to have the burden to take steps to install filters is unreasonable, unfair, and unlawful. It is not the job of the customer or a third party to ensure that the Defendants honor obscenity laws and make their products safe for use. 187. The Defendants sold their products to their customers with software that allows them to connect to the internet, as part of the normal use of their products and expectations. The Defendants knew that the Plaintiff could stumble upon content that had addicting qualities and could produce sexually compulsive behavior that would diminish the quality of the Plaintiff's life. The Defendants not only did nothing to prevent that inevitable encounter, they greatly encouraged it through withholding knowledge, through false advertising, and through false statements about the products safeness. Consent is something that is spread across a continuum, and inadvertent exposure to obscene content once can erode the ability to resist further interaction that exists only one small click away at all times. Predatory Pornographers know that - this is why they engage in mouse trapping to overwhelm the senses and the ability to resist. A wife deserves the fundamental right to have a paramount sexual monopoly over her husband's senses and desires, not ill willed exploitative pornographers. The Defendants knew that it would be an easy and inexpensive fix for them to sell their products on safe mode, which would filter out illicit pornographic content and terminate the atmosphere of overwhelming temptation - closing the door on the vile tactics of predatory pornographers. If the Defendants had sold their products to Plaintiff in safe mode, he would not have stumbled upon pornography and become injured. None of the Defendants warned the Plaintiff of the harmful impact that porn could have on his life if he was to stumble upon it through the normal use of the device they sold him, which violates the stand of decency in the distribution of obscenity in the Nashville community. The Defendants have a duty to honor child obscenity laws and there is something inherently wrong with allowing minors and adults to leave their stores with their products without filters that block obscene content that offend the community standards. After leaving the store with a filterless product an adult or minor can be accessing torture porn websites within minutes. There is something wrong with this picture.

212. There is something inherently wrong with the fact that children cannot be allowed to enter a strip club or see an rated movie, but they can walk around with portable x-rated theaters in their pockets in the form of a cell phone.

COUNT EIGHT: Defendants' Liability for Breach of Manufacturers' Duties, Deceptive Trade Practices, Including Failure to Warn, Failure to Test, Sale of Defective and Unreasonably Dangerous Products (Strict Liability, Negligence, and Breach of Implied Warranty)

213. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. All states, including Tennessee, and the District of Columbia impose duties on manufacturers and suppliers of products intended for human use and consumption, to exercise reasonable care and to refrain from selling products that are defective or unreasonably dangerous when used as intended by foreseeable users of the product.

214. The Device makers' duties included the duty to test their products adequately to determine that they were safe for their intended use; to design their products so that, when used as intended, they were reasonably fit and safe for their foreseeable users; and to warn foreseeable users of dangers related to their products' use. The Device Makers have also impliedly warranted that their products had been adequately tested and were not defective or unreasonably dangerous when used as intended by foreseeable users.

215. In breach of their duty and implied warranty, the device maker's manufactured and supplied products that were defective and unreasonably dangerous when used as intended by foreseeable

users of their product.²²³ The Defendants' products were defective, unreasonably dangerous, and not fit for ordinary use when they left the possession of the manufacturing plant. The cell phones and laptops manufactured by the electronic companies were expected to, and did, reach the consumer in substantially unchanged condition from that in which they were manufactured.

These sophisticated high tech Defendants have had superior knowledge and access to information about their products and knew that consumers, particularly children whom they targeted, were unaware of the full range of the mental health, sexual health, reproductive health, occupational, and relational risks caused by the companies' products, including addictiveness, the companies' manipulation of their products, and the effects such manipulation would have on the

²²³ Breach of Warranty: Unless excluded or modified (T.C.A. § 47-2-316), a warranty that the goods shall be merchantable is implied in a contract for their sale if the seller is a merchant with respect to goods of that kind. (2) Goods to be merchantable must be at least such as: (a) pass without objection in the trade under the contract description; and (b) in the case of fungible goods, are of fair average quality within the description; and (c) are fit for the ordinary purposes for which such goods are used; and (d) run, within the variations permitted by the agreement, of even kind, quality and quantity within each unit and among all units involved; and (e) are adequately contained, packaged, and labeled as the agreement may require; and (f) conform to the promises or affirmations of fact made on the container or label if any. (3) Unless excluded or modified (§ 47-2-316) other implied warranties may arise from course of dealing or usage of trade. The Defendants breached the implied warranty of merchantability in the sale of the phones, laptop, and computers by selling the products without filters. The Defendants maliciously exposed the Plaintiff to obscene and highly addictive pornographic content, knowing that the material was highly addictive and illegal to distribute. The Defendants designed their products in such a fashion to enable this to occur, knowing that their actions would harm the Plaintiff for their personal financial benefit. Given their agency relationship with predatory pornographers and their knowledge of the scams they would impose on the Plaintiff to become unnaturally bonded to their products at the the expense of his relationship bonds of his family. The Defendants calculating agenda was the direct and proximate result of the damages sustained by the Plaintiff. No where on the manufacturers packaging was their any indication of any kind that the products contained the ability to inflict the Plaintiff with unwanted addictions (like there are on packs of cigarettes). The retailer not only failed to provide any kind of warning, but made false statements about the products being family friendly and harmless. The goods sold to the Plaintiff were unfit for the ordinary purposes for which such goods are used. The Plaintiff wanted to use the product for business, not sexually deviant misconduct, endangering the welfare of himself and others.

users' health and quality of life and their families. The Defendants and their co-conspirators engaged in deceptive trade practices, T.C.A. § 47-18-109.²²⁴

216. The Defendants have maliciously created an environment and platform for predatory pornographers and copyright pirates to thrive with total indifference to the law and the welfare of their customer. The Device makers manufactured and sold laptops and cell phones that, when used as intended, caused a large percentage of users to become addicted and to develop often tragic sexual voyeurism, low self-esteem, erectile dysfunction, arousal addiction, stimulation addiction, adverse rewiring of the reward cycle, unwanted alteration of sexual orientation, depletion of oxytocin, the cultivation of dehumanizing beliefs about members of the opposite sex, self-hatred, shame addiction, relationship devastation, grotesque depravity, a degradation into more perverse and extreme forms of sexual appetites to include the desire to rape and sexually abuse children. In many cases the pornography that the Defendant's products expose its customers to is so graphic that it causes the viewer to completely shut down sexually. There are studies of children encountering torture pornography content on the Defendants' products only to then sexually shut down.

²²⁴ Deceptive Trade Practices here: T.C.A. § 47-18-109(a)(1) creates a private cause of action for any person who suffers a loss as a result of one of the listed “unfair or deceptive acts or practices” found in T.C.A. § 47-18-104(b). T.C.A. § 47-18-109(a)(1) provides as follows: (a)(1) Any person who suffers an ascertainable loss of money or property, real, personal, or mixed, or any other article, commodity, or thing of value wherever situated, as a result of the use or employment by another person of an unfair or deceptive act or practice described in § 47-18-104(b) and declared to be unlawful by this part, may bring an action individually to recover actual damages. The Defendants engaged in deceptive trade practices by leading the Plaintiff to believe that their products were safe. The Defendants made no mention whatsoever that they were exposing the Plaintiff to addicting content through their pornographic agents. The Defendants commissioned and invited their agents to cause the Plaintiff to interact with their pornographic content through a deliberate design flaw and a collective agreement. In doing so the Plaintiff developed codependence and attachment to the Plaintiff's products. This was as the Defendants wanted. As a result of this deceptive plan, the Plaintiff suffered the loss of money, property, and other things, as a direct result of the Defendants bad faith, deceptive practices, false advertising and fraud.

218. Rather than testing to determine whether their products were safe for their intended use or how hazardous their porn distribution policy has been, the device makers, along with their co-conspirators, deliberately designed the products to maximize porn consumption and make monitoring by parents and schools impossible and unfair. The Defendants have backed and supported groups like Planned Parenthood who infiltrate schools to recommend to children that they watch porn on the products that the Defendants sell as a form of "sex education." The Defendants support these groups in hopes of having children addicted to pornography and codependent on their products.

219. The Defendants know that they are in possession of the technology to make reasonable attempts to block pornography. They know that the idea of "self-censorship" and "self-accountability" in a climate where pornographers are engaging in a litany of tactics and tricks to make interaction with pornography virtually impossible is totally unrealistic. The Defendants know that they have the ability to sell their products with preset filters and to play the essential role of the keeper of the password. They know that the missing element is that there is no third party to be the keeper of the password. Because of their greed, the device makers have cultivated a culture of dishonor, dishonesty, depravity. If the Defendants actually cared about humanity, they would sell their products with filters to encourage honesty, integrity, purity, and honor - and the freedom of choice.

220. The Device makers knew or should reasonably have known, in light of methods available at the time of manufacture, about less hazardous, feasible alternative designs for their product. Despite the feasibility of less hazardous alternative designs for their products, the Device Makers failed to research or adopt such less hazardous alternatives, and did instead fail to reduce by a

meaningful amount the harmful components of pornography they distributed into the public; and misled the public by marketing so-called "parental controls" that are poorly designed, fail to work without a third party password keeper, do not come activated, and only work on guest accounts.

221. Despite knowing of the extreme dangers of the pornography they distribute, the device makers refuse to provide warnings to their customers for reasons that are predicated on nefarious self-interested greed. The true nature of the mental, spiritual, physical, and emotional health risks of consuming pornography were beyond that reasonably contemplated by the ordinary consumer, and in particular beyond that contemplated by the ordinary beginning user who was not yet dependent upon porn or the products sold by the defendant that make the drug available.

222. The full range of health risks of accessing porn on the products sold by the Defendants was beyond that contemplated by young adults, especially testosterone saturated males like myself, children, whom defendants targeted with their marketing campaigns. Moreover, the true risks of their products, as designed, engineered, and marketed by defendants, were not open or obvious to consumers, particularly children.²²⁵

223. Because the Defendants had available to them the means to reduce the hazards of exposure to pornography but chose not to develop or effectively implement safeguards, the extreme danger of the design of the devices manufactured by the Defendants - including the danger of mental, reproductive, and emotional health problems from long term use - substantially outweigh the

²²⁵ Currently as it stands, when retailers sell the defendant's products, they check for ID only to match the name of the credit card with the name of purchaser. It is not too much to ask that they also check for age verification. If the person is of age and asks for the passcode, the retailer should be allowed to provide it to them, after it gives them a warning about the dangers of pornography.

utility of the design. I lost my wife and my son and am faced with spurious threats because of the immorality of a vindictive District Attorney's office who can covert the failures of the device makers into charges to suit their own agenda as state agents. The Device Makers are chiefly responsible for the explosion in the demand side of human trafficking, child porn production, revenge pornography, and the destruction of marriages.

224. The ISPs and their co-conspirators, failed to use reasonable care in testing the safety of the their products manufactured by them, in designing the devices manufactured by them, and, in providing instructions to users and in providing adequate warnings concerning the use of the device in regards to interfacing with pornography. The Device Makers' breach of their duties and implied warranty was done in reckless and wanton disregard of the safety of the purchasers and their families, and with actual knowledge of the fact that the conduct of the Device Makers would cause serious injury and devastation in the lives of the purchasers - to include untold collateral damage.²²⁶ As a direct and proximate result of the breach of their duties and implied warranty by the ISPs, individually and collectively, millions of users of their products have suffered and will continue to suffer emotional, mental, and physical harm. The pornography

²²⁶ The Defendants were negligent in voluntarily undertaking the removal of porn from app stores only to falsely mislead the public that their products were porn free. The Defendants were negligent in voluntarily selling their products with parental controls that were not activated and did not have a mechanism under which they would be a third party keeper of the password. The purpose of the parental controls is to establish accountability. But the parental controls under the current condition fail to accomplish that objective entirely. The Defendants have breached the duty of care in these voluntary undertakings because they want to continue the false narrative of "blaming the parents" so that the Federal Government will not step in begin regulating their products. The defendants are blaming the "nut behind the wheel" just like the auto manufactures did before the Federal Government stepped in and began enforcing safety standards. Although I am a staunchly opposed to big government normally, in this case we are dealing with matters of safety and internalized National Security interest. Accordingly, the Federal Government must be responsive to this out of control sex racket that the Device Maker's greed has given birth to. It starts with the issuance of a preliminary injunction.

distributed by the defendants encourages violence towards women, criminal sexual deviance, infidelity, and unspeakable perversion.²²⁷

COUNT NINE ” Defendants' Liability for Violations of State Consumer Protection Statutes (Unfair, Unconscionable, and Deceptive Acts or Practices

225. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. All of the states, including Tennessee, Pennsylvania, and the District of Columbia have consumer protection statutes that prohibit unfair, unconscionable, deceptive and misleading trade practices directed toward consumers, and private consumers may recover damages for conduct that violates these statutes. In Tennessee the statute is Tenn. Code Ann. § 47-18-101 et seq and Pa. Stat. tit. 73 § 201-1 et seq.

226. The conduct of defendants and their co-conspirators, as set forth above, violated their duty imposed upon them by the above-cited statutes to refrain from engaging in unfair, deceptive, and unconscionable trade practices.²²⁸ In particular, the knowingly fraudulent misrepresentations, fraudulent omissions, and fraudulent concealment of material facts described in this Complaint and will be shown at trial, had the capacity, tendency, or effect of deceiving or misleading consumers and constituted unfair, deceptive, and unconscionable trade practices for which defendants were and are subject to tort liability under the above-cited statute.

²²⁷ Among other things, users experienced diminished overall health and an increased risk of reproductive injury, mental illness, and relational death. The more one looks at pornography, the less likely the viewer will acquire the intimacy he truly craves. Among those who suffered injury as a result of Defendants' tortious conduct are persons for whom the anti-sex trafficking Christian groups have furnished or paid for, and will furnish and pay for medical and therapeutic treatment under various restorative programs. This includes women who have been the victim of sex relate crime, human trafficking, and forced prostitution.

²²⁸ T.C.A. § 47-18-109(a)(1) creates a private cause of action for any person who suffers a loss as a result of one of the listed “unfair or deceptive acts or practices” found in T.C.A. § 47-18-104(b). T.C.A. § 47-18-109(a)(1) provides as follows: (a)(1) Any person who suffers an ascertainable loss of money or property, real, personal, or mixed, or any other article, commodity, or thing of value wherever situated, as a result of the use or employment by another person of an unfair or deceptive act or practice described in § 47-18-104(b) and declared to be unlawful by this part, may bring an action individually to recover actual damages.

227. Defendants and their co-conspirators have made false and misleading statements to me and other consumers, to include that (1) porn is not accessible on their products; that (2) there is no causal connection between the porn they distribute and adverse health effects; that (3) the products improve the quality of ones life in all areas; that (4) the company's products are family friendly; that (5) the company is concerned with safety; that (6) the pornography they distribute is not addicting; that (7) they are opposed to pornography; that (8) self censorship is the duty of the purchaser. ²²⁹

228. The Defendants and their co-conspirators have falsely denied marketed their porn filled products to children, and have done nothing to protect them from exposure to the aggressive tactics of pornographers. They know that they are prohibited from distributing website domains like "watersport.com" that are porn sites. The Defendant's and their co-conspirators know that their products are part of the analog world, and that they represent miniature extensions of the retail store. The Defendants know that they have a duty to sell their products in a manner in which the ocean of porn that lies in wait is held at bay in accordance with the shield statutes. The Defendants have not been honest with the public as to their adherence to the law and the honoring of their duties. Instead, the Defendants have falsely coward behind inapplicable statutes like section 230 of the CDC which was promulgated to protect decency, not indecency. The defendants further violated their duties under the state consumer protection statutes to refrain from representing that their products are of a particular standard, grade, or quality when they are

²²⁹ Defendants and their co-conspirators have made affirmative material misrepresentations, have omitted material facts, and have concealed material information concerning the health risks associated with exposure to pornography. The Defendants and their co-conspirators have omitted facts about the effectiveness of parental controls and failed to act as the third party keeper of the password. They have made false and misleading statements and concealed material information concerning both the addictiveness of pornography and their own manipulation of delivery of pornography in more potent manners, as their technology follows porn.

not, from representing that their products have benefits that they do not have. They have therefore engaged in false and misleading advertising.

229. Defendants and their co-conspirators further engaged in unconscionable conduct prohibited by the state consumer protection statutes by knowingly and intentionally causing defective products to be marketed and sold to the vulnerable less tech savvy population. Third party filtering companies do not have the insider information to create filters for products created by manufacturers who have contempt for the law and the welfare of their customers. Consumers do not know which filtering companies to go with; how to install filtering software; and whether or not it will even work. Often times, the tech companies will make a single change to their products and the third party filtering devices become totally obsolete.²³⁰

230. Defendants' and their co-conspirators' knowing violations of their duty under the state consumer protection statutes to refrain from engaging in unfair, unconscionable, deceptive, and misleading trade practices had the tendency to deceive consumers. Consumers relied upon defendants' and their co-conspirators' misleading and deceptive statements to their detriment by purchasing and filterless devices, or by refraining from trying to quit, or by failing to reduce their consumption of the porn that the defendants distribute. Consumers suffered harm from porn consumption. Among other things, consumers who consumed porn on the Defendant's filterless

²³⁰ The Defendants engaged in deceptive trade practices by leading the Plaintiff to believe that their products were safe. The Defendants made no mention whatsoever that they were exposing the Plaintiff to addicting content through their pornographic agents. The Defendants commissioned and invited their agents to cause the Plaintiff to interact with their pornographic content through a deliberate design flaw and a collective agreement. In doing so the Plaintiff developed codependence and attachment to the Plaintiff's products. This was as the Defendants wanted. As a result of this deceptive plan, the Plaintiff suffered the loss of money, property, and other things, as a direct result of the Defendants bad faith, deceptive practices, false advertising and fraud.

products have experienced diminished overall sexual health, reproductive health, relational health, mental health and an decrease quality in life. This occurred in my case.²³¹

COUNT TEN CIVIL CONSPIRACY

231. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The Defendants formed an Enterprise with other tech companies and pornographers to maximize their customers exposure to pornography.

232

232. At all times material to this action, defendants participated in a civil conspiracy among themselves, and with other persons known and unknown, the purposes of which were, *inter alia*: (a) to conceal knowledge of the harmful effects of porn that is distributed by the Defendants from the public, the medical and scientific community, and governmental authorities; (b) to create an illusion of making censorship an internet problem, a parent problem, a personal problem, and the content creators problem - when it is the Defendants' breach of its duty that is the problem in actuality; (c) to mislead the general public concerning the addictive properties of

²³¹ The Defendants have made all of these false statements about allowing porn to be available by misframing the consumers duty and hiding behind false free speech arguments. This was a per se bullying tactic. When the truth is that pornography is censoring morality and religious speech. There is an inevitable censoring taking place that is unavoidable. Real freedom in this scenario would be to provide purchasers with the choice as to whether they want to have access to porn or not. Children should have no choice in the matter, until they become 18. Greedy selfish adults have completely left them out to dry to the point where children have the right to distrust adults and authority in that regard. Many adults who Christian, married, and proponents of health will not seek to acquire a passcode to deactivate the filter. The prudent adults will not choose to open the door to exposure. Our world will be a much safer, innocent, and healthier place. The human race itself will better be able to flourish and maximize utility with the power to choose. As it stands now, the Defendants and their coconspirators are making the choice for consumers to expose them to the merciless and manipulative predatory pornographer tactics, who they are partnered with.

²³² Defendants did not only individually and collectively agree that they would disregard obscenity laws and hide behind non-applicable first amendment ideals, they entered into a partnership with all other device makers, to include Apple and HP, agreeing in concert to disregard the law. The collective agreement between device makers to ignore obscenity laws is known as "the porn compact." The companies agreed to all ignore obscenity laws and to align themselves with predatory pornographers, while marketing their products as family friendly. The rationales behind the "porn compact" was to (1) blame the internet; (2) pay off politicians through campaign contributions; and (3) collectively agree not to honor obscenity laws so that none of them could be held accountable.

the pornography that they distribute and the codependency it breeds; (d) to mislead the general public and governmental bodies by suggesting that through providing parental controls the products were safe for all users; (e) to mislead the general public and governmental bodies that the Defendants' products were "family friendly," "porn free," and "complicit with the law;" to (f) mislead the public and governmental bodies of their intent to market to children and get them hooked on porn through the available free samples and the immediate access; to (g) suppress research that accessing pornography is an essential business strategy that is a driving force in technology; to (f) cover up evidence of their exploitation of content creators for their paramount benefit at the expense of human rights; to (h) prevent the development and marketing of less hazardous products; to (i) mislead the general public and the governmental bodies that the Defendant's lack the technology to block pornography but that other third party companies did; to (j) market filterless products to young adults and teenagers to ensure in order to insure a lucrative future market for their products given the realities of co-dependency and the science of dopamine; to (k) to maintain a market for their defective and unreasonably dangerous products, when there is absolutely no justification for the Defendant's dangerous decision to sell filterless devices, where the purchaser is going to be forced to interact with pornography; to (l) misrepresent and exploit the biological of humans and fallible nature of man in places him in scenario of overwhelming temptation only to turn around and finger point the victim for injuries

they caused, when the Defendants fully knowledgeable that they have invited predatory pornographers to hunt their customers for the Defendant's ultimate benefit.²³³

233. During the course of the conspiracy, the conspirators, acting in concert, engaged in numerous concerted acts to further the purposes of the conspiracy.²³⁴ Each act of the conspiracy was ratified by the other co-conspirators, who acted as each other's agents in carrying out the conspiracy. None of the device makers step forward to sell their products with custom made preset filters because they know that all of the others will have to do the same thing.

Additionally, to correct the problem would amount to another admission of guilt and subject the Defendants to litigation. But more specifically, if any of the Defendants' co-conspirators began to sell their products with functional filters, it would interfere with their dark and nefarious scam to "pornify" culture for their ultimate benefit. The Defendant's have callously executed this vile strategy and in the process managed to cultivate a sexual holocaust. They are eroding social norms, encouraging sexual dysfunction, proliferating homosexual lifestyle, destroying marriages, inspiring unspeakable violence towards women and children, and have the audacity to pin the blame on their own customers, who are victims of the Defendant's serial greed that is effectively

²³³ The Governors and Attorney generals in all of the states in the U.S. refused to enforce obscenity laws against the Defendants because device makers were continuing so much money to their political campaigns and political parties, making a mockery of the rule of law in this Nation. The refusal of the executive branch to enforce the law as written is completely outrageous and confirms their direct roll in the proliferation of a sexual holocaust which has eroded freedom in America. A complete break down of our political system has occurred that the Honorable Courts of the United States can redeem.

²³⁴ At all times relevant to the factual allegations in this complaint, the Defendants conspired and knowingly acted in concert with the intent and understanding that they were subjecting the Plaintiff and all of their other customers to unwanted pornography addiction, that they were aware of the dangerous hazard and deliberately mislead the Plaintiff in a scam to maximize profits, that they had set out to make all customers chemically dependent on their products, that they were acting in concert with predatory pornographers to invade the their customers privacy for their own personal benefit. As such, the unlawful tortious acts of all of the Defendants undertaken in the course of, and in furtherance of this civil conspiracy are imputed to each other and each Defendant is civil liable for all of the unlawful and tortious misconduct as if they actually, physically committed or ordered the commission of such unlawful, tortious acts themselves.

psychopathic. Third party filter companies without insider knowledge have arisen to cover down on the failures of the Device makers.²³⁵

234. The Enterprise/civil conspiracy was formed in the early 1990s. It was designed to maximize profits by a the greedy tech companies. The civil conspiracy was also formed to advance an atheistic liberalized agenda to encourage selfishness.

235. The Defendants had an implied partnership with other Tech companies and predatory pornographers.²³⁶

**COUNT ELEVEN: FEDERAL VIOLATION OF SECTION 15 U.S.C. §§ 1051 ET SEQ:
LANHAM ACT FOR FALSE ADVERTISING**

²³⁵ The Device Makers should be required to pay out hundreds of millions of dollars to these companies to cover their time and expense and to offset any unjust enrich or breach of contract claims filed against them by their customers. In fact, all of their customers should be reimbursed completely. The very idea that people are having to pay to attempt to block porn on the Defendant's device is unconscionably evil. At the very least, the Defendants should charge a fee to have the filters removed. Moneys from the removal should go to the Government and the countless Anti-Sex trafficking groups such as A21, The Well House, Stop Sex Trafficking Now, and anti-porn groups like Fight The New Drug, Pink Cross Foundation, Think Atomic, Clean Services Foundation. Each defendant is jointly and severally liable for the torts of the other members of the conspiracy which were committed in furtherance of the goals of the conspiracy.

²³⁶ A general partnership “is an association of two (2) or more persons to carry on as co-owners a business for profit.” Tenn.Code Ann. § 61–1–105 (Supp.1995). “While it is clear [that] establishing the existence of a partnership is a less rigid process than for a limited partnership, there must still be sufficient evidence of ‘the intent to do the things which constitute a partnership.’” *Taylor & Assocs., L.P.*, 249 B.R. at 446–47 (quoting *Bass v. Bass*, 814 S.W.2d 38, 41 (Tenn.1991)). In particular, Tennessee courts have analyzed whether a partnership agreement exists in light of contract law... “[W]hile it is not essential that ... [contracts of partnership] be in writing, nevertheless, when an oral contract is sought to be enforced the [triers] of fact are required to carefully scrutinize and weigh the evidence, and should be satisfied of its existence by clear and convincing proof.” *Wheeler v. Haley*, No. 91–267–I, 1993 WL 398489, at p. *4 (Tenn.Ct.App. Oct.1, 1993) (citation omitted). “To be an enforceable contract it must, among other elements, result from a meeting of the minds in mutual assent to terms, must be based upon sufficient consideration, and must be sufficiently definite.” *Id.* at p. *5 (citations omitted). *Taylor & Assocs., L.P.*, 249 B.R. at 246–47. The Supreme Court of Tennessee, in *Bass*, elaborated upon this contract standard:[T]he existence of a partnership depends upon the intention of the parties ... [as] ascertainable from the acts of the parties.... [A] contract of partnership, either express or implied, is essential to the creation of partnership status The existence of a partnership is not a question of the parties' undisclosed intention or even the terminology they use to describe their relationship, nor is it necessary that the parties have an understanding of the legal effect of their acts. It is the intent to do the things which constitute a partnership that determines whether individuals are partners [T]he existence of a partnership may be implied from the circumstances where it appears that the individuals involved have entered into a business relationship for profit, combining their property, labor, skill, experience, or money. *Bass*, 814 S.W.2d at 41 (citations and footnote omitted).

Truthful lips endure forever, but a lying tongue is but for a moment. Proverbs 12:19

236. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The Lanham Act establishes a federal cause of action for, among other things, false advertising.²³⁷ (See exhibits for specific acts of fraud.

237. The plain language of the statute permits any person likely to be damaged to assert a claim based on a false or misleading statement of fact about a product, service, or commercial activity: (1) the defendant made a false or misleading statement of fact in a commercial advertisement about a product to the Plaintiff; (2) the statement deceived and had the capacity to deceive a substantial segment of potential consumers, which include the Plaintiff; (3) the deception was material, in that it was calculated to influence the consumer's purchasing decision; (4) the product was in interstate commerce; and (5) the plaintiff was been injured as a result of the statement. These elements were satisfied here.

238. For purposes of Rule 9(b), in 2005, I purchased Comcast services. The Comcast agent purposefully informed me that their products were safe for consumption, that they sold family friendly products that could improve the quality of my life and that I would not be adversely impacted whatsoever in the use of these products. The Defendants fraudulently concealed information regarding the lack of safeguards. I was not warned in anyway that I would be exposed to the relentless tactics of aggressive predatory pornographers who literally stalk their

²³⁷ (a)(1) Any person who, on or in connection with any goods or services, or any container for goods, uses in commerce any word, term, name, symbol, or device, or any combination thereof, or any false designation of origin, false or misleading description of fact, or false or misleading representation of fact, which (B) in commercial advertising or promotion, misrepresents the nature, characteristics, qualities, or geographic origin of his or her or another person's goods, services, or commercial activities, shall be liable in a civil action by any person who believes that he or she is or is likely to be damaged by such act.

customers like prey. The false advertising initiatives, failure to disclose hidden hazards, failure to warn about the addictiveness of pornography, and the flagrant misdirections were the proximate cause of my injury.²³⁸ When I purchased the products, I asked the salesmen, as part of standard operating procedure, if I could be hurt by the product. They said “no.” I queried whether the device was defective or could place me in danger whatsoever. The authorized agents said “no.” There were no signs or labels anywhere on the packaging about the fact that I would be hunted down and forced to interact with pornographic material. There were no warnings of any kind that the Defendants were distributing misleading domain names.²³⁹ There was no indication that I would have trouble avoiding pornographic images and videos that constituted unbearable sensory overload, seductive enticements, and overwhelming temptation, as I was exploited for being a male. There were no warnings of any kind about the potentiality of porn addiction. This failure to disclose was a material breach by highly trained technicians, who held themselves out as law abiding professions who were subject matters experts on complex electronics birthed from cutting edge technology.

²³⁸ Hagen v. U-Haul Co. of Tenn., 613 F. Supp. 2d 986, 996 (W.D. Tenn. 2009); See, e.g., Evans v. Pearson Enters., Inc., 434 F.3d 839, 852-53 (6th Cir. 2006)

²³⁹ Here are examples of some misleading domain names: <http://www.BigGuns.com>, www.FreeViewMovies.com, www.Grayvee.com, www.PicHunter.com, www.DailyNewMedia.com, www.4greedy.com, www.ElephantList.com, www.deluxe1.net, www.hothomeade.com, www.cliphunter.com, www.keezmovies.com, www.pandamovies.com, www.sublimedirectory.com, www.spamfreeforums.com/overload, www.bravoteens.com, www.wunbuck.com, www.homemademoviez.com, www.myhomeclip.com, www.bulldoglist.com, www.shufuni.com, www.galleries4free.com, www.twelvefifteen.net, www.spunksplash.com, www.worldsblogs.com, www.messedup.net, www.Group56.com, www.smokinmovies.com, www.herculinks.com, www.the-feeding-tube.com, www.bighomemovies.com, www.myfreepaysite.com, www.devilmanonline.com

The combine intentionally false statements combined with the concealment of known dangers caused my injury. The Defendants used their false family friendly reputation, technological expertise, and brand name clout to dupe me into purchasing an unsafe product.

COUNT TWELVE: FALSE ADVERTISING (Tennessee Common Law)

239. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The Defendant engaged in unfair, deceptive, untrue, and misleading advertising. The Plaintiff suffered injury in fact and lost money and property.

COUNT THIRTEEN: NEGLIGENT MISREPRESENTATION

240. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The Defendants made false statements of past or existing fact regarding their product. The statements were directed at the suing party. The statements had acted to induce the suing party to contract. The falsities caused injury.

COUNT FOURTEEN INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

241. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The Defendants knew or should have known that all male customers, which includes the Plaintiff, are chemically and biologically designed to be attracted to females by sight.

243. The Defendants knew or should have know that the Plaintiff could accidentally stumble upon pornographic images that would hook him into the online porn world to the point of causing arousal addiction that would be mentally and emotionally disturbing.

244. The Defendants knew or should have know that the impact of such a condition could destroy the Plaintiff's family, quality of life, income producing capability, and so forth, and such destruction would be emotionally traumatic, more than a person could handle.

245. The Defendants could have easily sold its devise with filtering software installed which required the Plaintiff to take an additional step to acquire a password that was specifically designed to have the filter removed with little burden to itself.

246. The foreseeable and proximate cause of the injuries inflicted on the Plaintiff directly stem from the Defendants' failure to act.

247. The Defendants were well aware of the of damaging qualities of pornography to include the psychological damaging components, but the Defendants refused to provide any warnings to the Plaintiff of how the content accessible on their products could cause him injury. This failure to warn and protect amounts to conduct that should not be tolerated by civilized society.

248. The burden placed on the Defendants to make the requisite adjustments to keep their products from harming their customers is low. Yet, the Defendants failed to protect the plaintiff from being inflicted with addiction which lead to emotional pain and suffering and mental anguish.

COUNT THIRTEEN: NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS

249. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. Defendants owed the Plaintiff a duty of care by selling him a device that would not cause him mental, physical, and emotional injuries and diminish the quality of his life.

250. The Defendants breached their duty of care by negligently, accidentally or recklessly creating a punishing, hazardous and unduly harsh living environment, by negligently, accidentally or recklessly failing to safeguard the mental and physical health and well-being of Plaintiff by selling him a device that was not set on "safe mode," and by negligently, accidentally or recklessly failing to provide plaintiff with notice of the dangers of pornography that was accessible through the device.

251. The Defendants breach of this duty directly and proximately caused the Plaintiff to suffer damages, mental and emotional, including fear, humiliation, depression, severe physical, thrill seeking, and emotional distress in causing the quality of his life to diminish. The emotional injury was so great that it provoked hospitalization for good cause. As a result, the Plaintiff has been damaged in an amount to be determined at trial.

COUNT SIXTEEN: OUTRAGEOUS CONDUCT

252. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The Defendants false advertising, concert effort with predatory pornographers, and knowledge of the dangers that they were subjecting the Plaintiff to was so heinous and beyond the standards of civilized decency to be classified as utterly intolerable by a civilized society. The actions were so heinous that a reasonable person

would declare "outrageous!" upon the discovery of this concerted compact plan, the fraud involved, and the damage done to our world at the expense of human rights. The Defendants failures to honor obscenity laws and scapegoat the internet, which is merely a part of the products makes them at the helm of a sex trafficking enterprise. The Defendants deserved to be viewed as being stationed at the helm of sexual holocaust. The Defendant's conduct has been malicious and extreme in all regards. The amount of sex prosecution violations and divorces that that could have been avoided if the products were sold with filters is nearly suffocating to contemplate - so much for total freedom of the no censorship arguments. There was a pattern of conduct, not an isolated incident as the Defendants carried out this fraudulent plan on millions of customers repeatedly. The Defendants' conduct is so outrageous it has caused a public health crisis, moved the United States toward backwardness, interfered with religion, and presented an internalized threat to National Security interest from the inside out - eroding fundamental freedom. Despite our education and all that we have learned from history, the Defendant's have been allowed to get away with conduct that is savage and barbaric. The Defendants have played a roll in a majority of sex crimes by the suspects who got their start down a voyeuristic path after being exposed to pornography. The distribution of torture porn websites and simulated rape websites warrant the immediate prosecution of the executives of each of the manufacturers to send the message that the abuse of obscenity laws is intolerable. The United States must return to a place of decency. There are 10 year olds who are watching porn and then acting out what they saw on a neighbor. The endless reports of disciplinary problem, collected by teachers, regarding children who have been given access to porn warrants immediate responsiveness by the manufacturer.

253. The Defendant owed the Plaintiff a fiduciary duty under these sets of facts and breached that duty. "Outrageous!" The testimonials from FTND in which the youth are crying out for relief as a result of the arrogant failures of adults is completely outrageous. The very idea that the youth is rising up to parent the adults is evidence of outrageousness on its face. I should not have to file this lawsuit at great personal expense. The laws of the United States should be enforced by the Governor and President or the legislature must have the backbone to impeach them for dereliction of duty. What kind of Soldier can respect and put his life on the line for a commander in chief, who disobeys his Constitutional oath of office? There is a web of outrageousness at work.

JOINT AND SEVERALLY LIABLE

254. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The Defendants are jointly and severally liable for the acts and omissions alleged in this complaint. All device makers who were part of the porn compact are liable. Because the Defendants all agreed to disregard obscenity laws and distribute pornography, all of the Defendants are equally liable for the injuries that followed. Now that there is a porn pandemic and sexual holocaust that has infiltrating the world community, I demand that all of the Defendants contribute to Christian organizations to clean up the mess they have made as a result of their Anti-American sales practices and corruption.

PUNITIVE DAMAGES Tenn. Code Ann. § 29-39-104

255. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. Punitive damages should be award under all available legal theories for each and every violation. Punitive damages should be awarded under Tenn. Code Ann. § 29-39-104. The defendants acted maliciously, intentionally, fraudulently or recklessly, and in concert with pornographers and other similarly situated device makers.

I REQUEST THAT THE COURT DEPUTIZE ME WITH ASSISTANT ATTORNEY GENERAL AND PROSECUTORIAL POWERS UNDER TCA § 8-7- 106

256. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. I ask that the Court effectively deputize me as an Assistant Attorney General/Assistant District Attorney like in *United States v. Mariani*, 121 F. Supp. 2d 803, 808-09 (M.D. Pa. 2000),²⁴⁰ so that I can help the state of Tennessee recover damages that it has sustained as a result of the Defendants racketeering, fraud, obscenity, greed, and sex trafficking violations by the Defendants and its co-defendants. The Defendants have stipulated that I am a capable and able attorney in their reliance on *Smith*. It is the Defendants job to prove that I am not license. *Blanton v. United States*, 896 F. Supp. 1451, 1466 (M.D. Tenn.

²⁴⁰ In *United States v. Mariani*, 121 F. Supp. 2d 803, 808-09 (M.D. Pa. 2000), the Court stated” even if the matters pursued by the Commonwealth of Pennsylvania in the early 1990's and this mail fraud prosecution were substantially the same, Mr. Barasch would not be precluded from participating in this prosecution. In *United States v. Birdman*, 602 F.2d 547 (3d Cir.1979), *cert. denied*, 444 U.S. 1032, 100 S.Ct. 703, 62 L.Ed.2d 668 (1980), our Court of Appeals ruled that the dual employment status of a United States government agency staff attorney deputized as a special attorney of the United States Department of Justice to conduct a grand jury investigation did not amount to a conflict of interest warranting dismissal of the indictment. It has also been recognized that state attorneys who have investigated a matter may be deputized as Special Assistants to the Attorney General of the United States for purposes of conducting a grand jury investigation on the same matter. *See United States v. Rosendin Electric, Inc.*, 122 F.R.D. 230, 247–48 (N.D.Cal.1987). If the appointment of a state attorney as a special *809 assistant to the Attorney General to conduct a grand jury investigation into a matter examined by that attorney as a state employee does not present a disabling conflict of interest, then Mr. Barasch's participation in this mail fraud prosecution following his service to the Commonwealth of Pennsylvania as Special Assistant to Governor Casey surely is not the kind of conflict of interest that the drafters of the Rules of Professional Conduct intended to address.

1995) aff'd, 94 F.3d 227 (6th Cir. 1996). Apple in their recent motion to dismiss establishes: “Mr. Sevier – who is a licensed attorney and, therefore, is not entitled to the latitude ordinarily afforded to pro se litigants....” Accordingly, by their own omission, I should be allowed to be deputized as a quasi-assistant attorney general/prosecutor²⁴¹ pursuant to Tennessee Code Annotated § 8-7- 106.²⁴² I went to Vanderbilt undergrad, Vanderbilt law school, I was trained by the United States Military at TJAGLCS as a Federal Prosecutor,²⁴³ and have served in that role. Anyone with tangential common sense knows that the TNSC targeted me for having sued Nancy Jones and Krisann Hodges of the BPR for waste, mismanagement, and fraud for the benefit of an F-list celebrity John Rich. (see Exhibits).²⁴⁴ If the Court permits my request, I will undoubtedly bring in local counsel, like Mark Freedman, whose wife operates “Abolition International” and

²⁴¹ *State v. Finch*, No. E2011-02544-CCA-R3CD, 2013 WL 6174832, at *7 (Tenn. Crim. App. Nov. 22, 2013), appeal denied (June 24, 2014) Notwithstanding the provisions of article VI, section 5 and Tennessee Code Annotated section 8-7-106(a), subsection (b) of 8-7-106 provides that a district attorney general may make special appointments to conduct specific criminal proceedings. As pertinent to this review, subsection (b)(4) provides as follows: Upon the consent of the attorney general and reporter, [the district attorney general may] specially appoint the attorney general and reporter, or an assistant to the attorney general and reporter, to conduct specific criminal proceedings, including grand jury proceedings, which the district attorney general is authorized by law to conduct in that district....

²⁴² TCA § 8-7- 106(a) If the district attorney general fails to attend the circuit or criminal court, or is disqualified from acting, or if there is a vacancy in the office, the court shall appoint some other attorney to supply such district attorney general’s place temporarily. The acts of such district attorney general pro tem shall be as valid as if done by the regular officer, and the district attorney general pro tem shall be entitled to the same privileges, and emoluments.

²⁴³ *State v. Crump*, No. M200602244CCAR3CD, 2009 WL 723524, at *33 (Tenn. Crim. App. Mar. 18, 2009) In Culbreath, a private prosecutor operated on behalf of the district attorney's office to prosecute crimes involving adult-oriented businesses. The private prosecutor was appointed a special assistant district attorney general.

²⁴⁴ The BPR and the TNSC are in bed together like Apple, HP, and predatory pornographers. So it is no surprise that these state entities conspired to maliciously target me pursuant to a false narrative that mirrors the false narrative of parental controls. These state actors grossly violated HIPAA to accomplish unlawful ends which should compel the disbarment of the members of the BPR and the TNSC involved in that gross injustice circus. This Honorable Federal Court itself was the presiding over 3:11-cv-00435, which was dismissed without prejudice, refiled in state court, moved to be consolidated with 10C4568. The Attorney General’s office, through AG Watts, effectively got on his knees and begged me not to pursue that case for the benefit of the state. I complied only as an act of mercy and because I prefer to build up the state, not harm it. Plus, I was proactively involved in overseas mission trips and international music relations - all of which are positive pursuits and are removed from adults with insufferable egos and inflated self-perceptions.

special counsel, like Alan Sears²⁴⁵-Bruce Taylor of the DOJ-types, to appear as co-counsel pro hac vice. We will tear the Defendants to pieces, recover for the state, and have a come to Jesus meeting that will have impact.²⁴⁶ Naturally, if this request is denied, I expect to be held to the lower pro se standard. Justice requires that it has to be one of the other. But I recommend quasi-deputization. Take it at face value, when I say “I got this.”

SECTION XI RELIEF

257. WHEREFORE, I pray these things:

A. BIFURCATED AND JURY TRIAL: I seek a bifurcated trial. The damages portion should be kept separate from the liability portion. I seek a jury trial.

B. UNDER RICO: Pursuant to the provisions of 18 U.S.C. § 1964, that this Court issue an Order and Judgment, jointly and severally, against defendants, providing the following relief:

1. That this Court order that all of the defendants who are found to have violated 18 U.S.C. § 1962, disgorge all proceeds derived from any violation of 18 U.S.C. § 1962, as justice requires.
2. That this Court issue a permanent injunction that will do the following:

²⁴⁵ Sears was a federal prosecutor in Ed Meese's Justice Department during the presidency of Ronald Reagan. While employed by the Justice Department he was the Staff Executive Director[1] of the Attorney General's Commission on Pornography. In the Spring of 1986 Sears became notorious for sending a letter from the Commission over his own signature to thousands of retailers warning them, in an attempt to intimidate them into not selling Playboy and Penthouse,[3] that they might be publically identified as pornography dealers. As a result of this letter more than 17,000 retailers stopped carrying the magazine. Christie Hefner, daughter of Hugh Hefner and president of Playboy Magazine, joined Penthouse International in suing the Meese Commission over Sears's letter. Judge John Garrett Penn ordered the Meese Commission to retract the letter, and Sears quit the Department of Justice in disgust, moving to the Department of the Interior.

²⁴⁶ Reinforcing the integrity of the rule of law, should be paramount. Additionally, in terms of capability, just remember, “as you read this sentence, I am practicing law.”

a. Prohibit each defendant and its successors, officers, employees, and all persons acting in concert with each defendant, from committing any act of racketeering, as defined in 18 U.S.C. § 1961(1), and from associating directly or indirectly, with any other person known to them to be engaged in such acts of racketeering or with any person in concert or participation with them; this includes predatory pornographers, child pornographer providers, prostitution hubs, and sex traffickers.

b. Enjoin and restrain each defendant and all other persons in concert with each defendant from participating in any way, directly or indirectly, in the management and/or control of any of the affairs of lobbying groups, (like the American Library Association, Democracy and Technology, Free Speech Coalition, ect) or affiliated entities known to them to be engaged in acts of racketeering.

c. Enjoin each defendant and persons in concert with each defendant from making false, misleading or deceptive statements or representations concerning harmfulness of pornography and its availability through the Defendants' products.

d. Prohibit each defendant and its agents from engaging in any public relations endeavor that misrepresents, or suppresses information concerning, the health, relational, occupational, reproductive, addiction, and lifestyle risks associated with interacting with pornography or the addictive nature of pornography, and from associating with any other persons for the purpose of engaging in such conduct.

e. Order each defendant to disclose, disseminate, and make available to the Department of Justice, the States Attorney General's Offices in all 50 states, Department of Human Services in

all 50 states, and such public health and regulatory authorities as the Court may select, all documents relating to research previously conducted directly or indirectly by themselves and their respective agents, affiliates, servants, officers, directors, employees, and all persons acting in concert with them, that relate to the health consequences of interfacing with pornography and pornography addiction, and the ability to develop, update, and maintain custom made filters that will make effort to block pornographic images and websites.

f. Order each defendant to fund, but have no part of or influence over the control of or decision making relating to, a legitimate and sustained corrective public education campaign, administered and controlled by an independent third party, relating to the public health issues of consuming pornography and pornography addiction. Examples of such groups could include Fight The New Drug, A21, The Well House, Pink Cross Foundation, Morality In Media.

g. Order each defendant to disclose, disseminate, and make available to the Department of Justice, the states attorney general's offices, and such public health and regulatory authorities as the Court may select, all documents relating to marketing or advertising campaigns that target and/or encourage children to purchase and consume their filterless products; enjoin each defendant from engaging in any such campaigns in the future; and order each defendant to provide mechanisms to ensure compliance, until they implement a robust filtering system with in person checks and balances to establish an atmosphere of accountability and safety.

h. Order each defendant to make corrective statements regarding the dangers of pornography, their duty to keep their customer from being exposed to it, and the addictive properties of pornography in future advertising, marketing, and promotion of their products. Order the

Defendants and their co-conspirators to discuss the correlation of watching pornography and downgrading of sexual preference to include homosexual conduct which amounts to rape by trick by a member of the same-sex.

i. Order each defendant to fund, but have no part of or influence over the control of or decision making relating to, sustained cessation programs including the provision of medically treating victims of sex trafficking, domestic violence, pornography addiction, and divorce.

j. Order each of the Defendants to fund reimburse all of the third party filtering companies that have launched in hopes of providing solutions to make the Defendant's products safe in light of the Defendant's bucking of responsibility and the executive branches refusal to enforce the existing obscenity laws against the Defendants. Order each of the Defendants to reimburse the customers of third party filtering companies, who never should have had to pay for such services in the first place because the Defendants had a legal obligation to comply with obscenity laws and products liability laws from their inception, like all other manufacturers and retailers.

k. Order each of the Defendants to custom make and develop filtering software that makes a reasonable attempt to block pornography. Order the ISPs to zone pornography to the unused ports. Order the ISPs to sell their services with customers opted out of pornography. Require the Defendants customers to provide proof of ID in person before being allowed to opt-in to interacting with pornography.

l. Order each of the Defendants to keep, maintain, and update the quality of the filters.

Complaints of submitted to the Defendants regarding breaches of the filters should be quarter submitted to the Department Of Justice, Federal Trade Commission, and The Federal

Communications Commission. The Defendants should provide proof of responsiveness regarding such violations. The Defendants should be adequately incentivized to maintain the filter system integrity and quality in the face of material repercussion that will achieve deterrence.

m. Order each of the Defendants to regularly send out filter updates as part of their software bundles to ensure optimal effectiveness of filters. Order the Defendants to provide the FCC, DOJ, and FTC with those updates.

n. Order the Defendants to issue a warning statement to all purchasers who would like to have the filter deactivated. The warning should be written by Morality In Media/Porn Harms out of Washington D.C. The warning should include information regarding where people can get help for pornography addiction. Maintain list of names of those who have sought to have the filter removed that could be subject to subpoena in civil domestic and in criminal proceedings, in the same way that phone or bank records may be acquired.

3. That this Court award the Plaintiff the cost of this suit, together with such other and further relief as may be necessary and appropriate to prevent and restrain further violations of 18 U.S.C. § 1962, and to end the ongoing wrongful conduct of defendants.

4. I seek attorneys fees under the R.I.C.O statute: 18 U.S.C. § 1962. For anyone to even suggest that I cannot practice law is a ratification of a corrupt scheme ran by Nancy Jones, Krisann Hodges, and members of the Tennessee Supreme Court, who prove that judicial elections is a terrible idea.

C. IF ALLOWED TO PROCEED ON BEHALF OF THE UNITED STATES:

5. If the Court will allow me to proceed on behalf of the United States, I seek money damages for an amount that is sufficient to provide restitution and repay the United States for the sums it has spent or will spend, constituting, as provided by law, the reasonable value of hospital, medical, surgical, and dental care and treatment furnished and to be furnished, paid for and to be paid for, by the United States to or on behalf of victims of sex trafficking and pornography addiction, who are beneficiaries various federal programs, as a result of the wrongful conduct of defendants, which amount is to be determined at trial by a jury.

6. I seek money damages for an amount that is sufficient to provide restitution and repay the United States for the sums it has spent or will spend, constituting, as provided by law, the reasonable value of prosecuting, investigating, incarcerating, detaining obscenity violators, child pornography violators, and sex related crimes that involved the purchase of filterless devices in any form or fashion, as a result of the wrongful conduct of defendants, which amount is to be determined at trial by a jury.

7. I seek money damages for an amount that is sufficient to provide restitution and repay the United States for the sums it has spent or will spend, constituting, as provided by law, the reasonable value of prosecuting, investigating, incarcerating, detaining, rehabilitating, and housing obscenity violators, child pornography violators, and sex related crimes that involved the purchase of filterless devices in any form or fashion, as a result of the wrongful conduct of defendants, which amount is to be determined at trial by a jury.

8. I seek money damages for an amount that is sufficient to provide the United States to combat, remedy, address, and rectify the secondary effects of pornography, as the United States Supreme

Court has recognized, as a result of the wrongful conduct of defendants, which amount is to be determined at trial by a jury.

9. The United States has suffered and in the future will continue to incur substantial monetary damages as a result of this same conduct. An actual, justiciable controversy exists between plaintiff and defendants regarding the ultimate legal and financial responsibility for these future damages.

10. Awarding the United States any further relief as may be necessary and appropriate.

D. UNDER THE OTHER CAUSES OF ACTION I SEEK

11. Plaintiff demands a preliminary and permanent injunction be imposed on the manufacture and retail Defendants, going forward that requires the installation of software that makes reasonable attempts to blocks obscene pornography from coming onto the machines. The Plaintiff demands that the injunction cause the retail and manufacturing Defendants to comply with child obscenity laws in modifying the products so that they are safe for use. The Plaintiff demands that the filtering software not be removed, by manufacturer or retailer unless the purchaser can prove that he is over 18 years of age and the purchaser takes the initiative to request that the filters be removed at a face to face meeting. Otherwise, the filters should remain in place permanently.

12. The Plaintiff demands that the Court order the Defendants to set up a system of face to face accountability where the purchaser who wants to deactivate the filter must provide proof that they are over 18 in person;

13. The Plaintiff demands an award of pre-and post-judgment interest;

14. The Plaintiff demands that from six months of entry of the preliminary injunction that all products be affixed with filtering software or recalled from the shelves;

15. The Plaintiff demands a preliminary and permanent injunction that forces the Defendants to send out a filtering system updates as part of their next operating system with continuous software to keep them compliant with the laws on devices that they have already sold but remain within their control; If the purchasers of these already sold products want their filter removed, require that they go to designated retail stores and provide proof of ID and have their named added to the public list in order to do so; the Defendants sold these devices under false pretense that they were "porn free," and they should be ordered to deliver on that promise, since they have defrauded the public through false advertising;

16. The Plaintiff demands a preliminary and permanent injunction that requires to the Defendants to provide any customer who seeks to have the filter removed, who is over the age of 18, with a literature on the addicting qualities of the pornography that they are distributing; the Plaintiff demands that the Defendants be required to provide a warning on with every computer of the consequences of interacting with porn on their site like as the British Prime Minister suggested; the literature should be prepared by Morality In Media;

17. The Plaintiff demands that a permanent and preliminary injunction be imposed on the Defendants to work with law enforcement to block websites that are likely engaging in organized crime, like Backpage.com;

18. The Plaintiff demands that he be awarded an amount over \$75,010 minimal jurisdictional limit to cover loss of income, medical expenses, costs, disbursements, reasonable attorneys fees, interest, for his personal damages, and whatever other relief the Court deems just and equitable;

19. The Plaintiff request compensatory damages under every count, treble damages, punitive damages, equitable damages;

20. The Plaintiff demands an award of the maximum punitive damages to be paid out to the following organizations to help combat pornography addiction and sex trafficking that the Defendants have inflicted upon our state, Nation, and world, who are working to combat the public health crisis that the Defendants arrogance and greed has caused; the Plaintiff demands an award of well over 100 million dollars to be paid out over time to the following organizations who are proactively fighting to clean up the unlawful actions of the Defendants; the testimony at trial by expert witnesses and reports should mandate the award amount; the Plaintiff demands that the award go to:

1. Fight The New Drug;
2. Pink Cross Foundation;
3. GirlsAgainstPorn;
4. LA Dream Center (Los Angeles);
5. Tim Keller Redeemer Church New York City;
6. A21 Campaign,
7. Porn Harms;
8. International Justice Mission;
9. Cross Point Church and West End Community Church (Nashville TN);
10. Church Of The Highlands; (Birmingham - Dream Center);
11. Willow Creek (Chicago);
12. McClean Bible Church (DC);
13. Free Chapel Church (GA);
14. Hand of Hope Ministries - Joyce Meyer Ministries;
15. New Life Church (Arkansas);
16. Healing Place (Louisiana);
17. Hillsong Church (Paris);
18. Hillsong Church (Australia);
19. Time Square Church (New York City);
20. North Point Church (GA);
21. South Eastern

Christian (KY); 22. White Ferry Road Church (West Monroe LA) 20. Oasis Church (Los Angeles) 23. Life Church (Memphis); 24. The Well House (Birmingham Alabama); 25. Morality In Media (DC); 26. Substance Church (Minnesota); 27. C3 (North Carolina); 28. Adventures in Missions; The World Race - Athens Georgia; 29. West End Community Church - Missionary Team; 30. Saddle Back Church (CA); 31. Calvary of Albuquerque (New Mexico); 32. Christian Fellowship (Palm Beach FL); 33. The Rock Church (San Diego); The JH Ranch (California); 34. Crossroads (Cincinnati OH); 35. Gate Way Church (Dallas TX); 36. Heritage Christian Center (Denver); 37. Bethel Baptist (Jacksonville FL); 38. Celebration Church (Austin); 39. Celebration Church (Jacksonville FL); 40. First Baptist Church (Orlando); 41. Maranatha Chapter; 42. Abolition International; 43. Agape International Missions; 44. Child hope Asia Philippines; 45. Coalition to Abolish Slavery and Trafficking, a Los Angeles; 46. Freedom Matters; 47. ABC Nepal, a non-profit non- governmental organisation working in Nepal on trafficking of girls and minors across India and Arabian countries.; 48. AFESIP (Agir pour les Femmes en Situation Precaire or Acting for Women in Distressing Situations) 49. AFESIP; 50. Alliance Anti Trafic, a non-profit organization working in Southeast Asia; 51. Apne Aap Women Worldwide, a grassroots movement to end sex trafficking based in New Delhi, founded by Ruchira Gupta Apne Aap Women's Collective (AAWC), helping the women and children of the Kamathipura red light district in Mumbai, and unaffiliated with the Apne Aap Women Worldwide organization; 52. 8th Day Center for Justice, a Roman Catholic non-profit organization based in Chicago, Illinois A Better World, an organization that is based in Lacombe, Alberta, Canada; 53. ACT Alberta, a Canadian coalition of Government of Alberta representatives, non- governmental organizations, community organisations, and the Royal Canadian Mounted Police; 54. Agape International

Missions, a nonprofit organization in Cambodia; 55. Araminta Freedom Initiative, a Baltimore based non-profit whose vision is to see the commercial viability of the human trafficking of minors in the Baltimore region dismantled and its victims freed; 56. Arizona League to End Regional Trafficking, a coalition representing partnerships with law enforcement, faith-based communities, non-profit organizations, social service agencies, attorneys and concerned citizens. 57. Breaking Free, a nonprofit organization based in Saint Paul, Minnesota, United States that provides various services to prostitutes, such as help finding a place to live and a job outside the sex industry; 58. "Breaking Out Corporation", a 501 (c) (3), a pro-active, not-for-profit organization whose mission is dedicated to Identify, Investigate and Rescue Victims of Human Trafficking, domestically and internationally. Breaking Out Corporation works in concert with law enforcement to affect Human Trafficking at its source. Breaking Out was specifically formed to fill desperate need in the fight against Human Trafficking to bridge the gap between awareness and action; 59. California Against Slavery, a human rights organization directed at strengthening California state laws to protect victims of sex trafficking; 60. Called to Rescue, a non-profit worldwide organization based in Vancouver, Washington given to rescuing minor children from sex trafficking, violence and abuse; 61. Centre to End All Sexual Exploitation, a nonprofit organization that helps human trafficking victims, sex workers, and the homeless by providing them with resources; 62. Chab Dai, a coalition founded by Helen Sworn that connects Christian organizations committed to ending sexual abuse and trafficking; 63. Childhope Asia Philippines, an international, non-profit, non-political, non-sectarian organization whose principal purpose is to advocate for the cause of street children throughout the world; 64. Children of the Night, the first and most comprehensive sex trafficking program in North America, including a 24 bed shelter

home for 11-17 year olds; 63. Children for Change Cambodia is a local, Cambodian-led NGO working to prevent the sexual exploitation of children in the Sensok community by providing educational scholarships. CCC's Center is a hub of activity in the middle of Phnom Penh's poorest red-light district. At CCC, children have access to a small library, daily classes, and often the only meal they may eat that day; 64. Children's Organization of South East Asia, the Children's Organization of Southeast Asia, COSA is an International Organization which works towards the prevention of child human trafficking and sexual exploitation within the Northern regions of Thailand; 65. Children's Rescue Initiative, an international organization which actively rescues children and slaves from human trafficking and child labor; 66. Coalition Against Trafficking in Women, an international non-governmental organization opposing human trafficking, prostitution, and other forms of commercial sex; Coalition to Abolish Slavery and Trafficking, a Los Angeles-based anti-human trafficking organization; Crowns of Hope provides financial assistance and Christian therapy for female victims of human trafficking and sexual abuse in Central Texas; 67. Deborah's Gate, a human trafficking victims safe house run by The Salvation Army in Vancouver, British Columbia, Canada that opened in 2009; 68. Destiny Rescue, is a grassroots, internationally recognized, Christian based, non-profit organization dedicated to rescuing children from human trafficking and sexual exploitation. We help rescue the sexually exploited and enslaved, restore the abused, protect the vulnerable, empower the poor and are a voice for those that can't speak up for themselves. Currently we are operating in Thailand, Cambodia, Laos, Myanmar (Burma), India and Mozambique; 69. ECPAT, an international non-governmental organization and network headquartered in Thailand which is designed to end the commercial sexual exploitation of children; 70. Emancip ACTION

(www.emancipation.org), a Mumbai-based international, non-profit organization dedicated to putting an end to the commercial sexual exploitation of children around the world The Emancipation Network, an international organization dedicated to fighting human trafficking and modern-day slavery EVE, an advocacy group based in Vancouver, British Columbia, Canada; 71. Face to Face Bulgaria, an organization whose primary mission is to prevent cases of forced prostitution and human trafficking in Bulgaria; 72. Florida Abolitionist, a nonprofit, non-governmental organization opposing human trafficking in Florida, United States Freedom Matters, a UK charity fighting trafficking and modern day slavery principally in Nepal but operating in India and beyond. This list is incomplete; you can help by expanding it; 73. Free for Life International, a U.S.-based non-profit human rights organization that globally works to partner with organizations and individuals globally to rescue victims and meet the needs of trafficking survivors and those who are considered to be in high risk of being trafficked. They partner by providing financial, emotional and spiritual support (<http://freeforlifeintl.org/>, <https://www.facebook.com/Freeforlifeintl>) GABRIELA, a leftist Filipino organization that advocates for women's issues; 74. Global Alliance Against Traffic in Women, a network of more than 100 non-governmental organizations from all regions of the world, who share a deep concern for the women, children and men whose human rights have been violated by the criminal practice of trafficking in persons Global Impact Phils Foundation, a Philippines-based organization that works to prevent human-trafficking (<http://www.myglobal.org/>, https://www.facebook.com/myglobal?directed_target_id=0); 75. Go MAD Ministries is a Christian not-for-profit based out of Texas established to fight human exploitation in the Dominican Republic. (Go MAD Ministries on Facebook); 76. Happy Horizons Children's Ranch is a humanitarian ministry of the

Assemblies of God, Philippines. It is a non-profit organization dedicated to the rehabilitation and defense of street children in the Philippines <http://www.hhcr.orgIng>; 77. International Justice Mission, a U.S.-based non-profit human rights organization that operates in countries all over the world to rescue victims of individual human rights abuse; 78. International Princess Project: advocating for women enslaved in prostitution; restoring their broken lives; empowering them to live free. The vision of International Princess Project is for International women once enslaved in the sex trade to have the opportunity to support themselves with skill and dignity, to heal in body, and spirit, and to live lives of freedom and for people worldwide to gain awareness about human trafficking and to rise up with finance and action to end forced prostitution. www.intlprincess.org; 79. TEMP - Institute for Trafficked, Exploited & Missing Persons, an international organization dedicated to ending contemporary slavery and human trafficking through public awareness, research and direct intervention; 80. Kabataang Gabay sa Positibong Pamumuhay (KGPP), Inc. an association of survivors and victims of male trafficking for the purpose of prostitution, pornography, the trade of illicit drugs, organized crime and exploitative forms of labor in the Philippines. Known for its ROLLI Fellowship, a survivor engagement program anchored on the core principles of human dignity, human rights and human capacity in empowering, enabling and engaging survivors in combating human trafficking and addressing the sequel of health and social ills arising from it among those who are afflicted; 81. La Strada International Association, an international NGO network addressing trafficking in human beings in Europe; London Anti-Human Trafficking Committee, a London, Ontario, Canada-based nonprofit organisation opposing human trafficking by means of advocacy and education; 82. Love 146 - Vision- The abolition of child trafficking and slavery, nothing less. <http://>

love146.org/Maiti Nepal, a non-profit organization in Nepal dedicated to helping victims of sex trafficking; 83. MANNA Freedom, the human trafficking intervention arm of MANNA Worldwide working to prevent human trafficking in Eastern Europe through the building of Bridge To Life Homes. 84. Men Against Sexual Trafficking, a London, Ontario, Canada-based organisation that opposes human trafficking by educating men on the issue and encouraging them to stop buying sexual services provided by human trafficking victims. 85. Million Kids (Riverside, California) serves as the Training and Outreach Coordinator for the Riverside County Sheriff Anti-Human Trafficking Task Force. [http:// www.millionkids.org](http://www.millionkids.org) Mongolian Gender Equality Center, a non-governmental organization based in Ulaanbaatar, Mongolia; 86. MTV EXIT (www.mtvexit.org) is the world's largest behaviour change campaign in the fight against human trafficking and exploitation; 87. NASHI, a Saskatoon, Saskatchewan, Canada-based organisation that opposes human trafficking by raising awareness through education; 88. Not for Sale Campaign, a 501(c)(3) non-profit organization based out of California Office to Combat Trafficking in Persons, a government agency responsible for coordinating efforts to address human trafficking in British Columbia, Canada. 89. Pillars of Hope, Inc. a faith based non profit that opposes human trafficking; is raising awareness and funds to build a restoration center in California; working to raise awareness of the tragedy occurring in the United States. [url=http:// www.pillarsofhope.us](http://www.pillarsofhope.us) Polaris Project, a nonprofit, non-governmental organization that works to combat and prevent modern day slavery and human trafficking; 90. PREDA Foundation, a charitable organization that was founded in Olongapo City, Philippines in 1974; 91. Project Rescue, a nonprofit Assembly of God organization that exists to rescue and restore victims of sexual slavery. It was founded in the red light district of Mumbai, India in 1997. It has 12

locations throughout India, Nepal, Moldova, Bangladesh, Tajikistan and Spain. url=http://www.projectrescue.com

Rahab Ministries Thailand, a Christian non-governmental organization that provides outreach for sexually trafficked women and children in Thailand; 92. Rapha House, a public benefit 501(c)(3) nonprofit committed to ending human trafficking, bonded labor and the sexual exploitation of children. url=http://www.raphahouse.org/

Ratanak International, an organization that rescues children from sexual slavery and then provides them with education, rehabilitation, and safety; 93. Reaching Out Romania, a non-governmental[35] charitable organization in Romania that helps girls ages 13 to 22 exit the sex industry; 94. Real Escape from the Sex Trade (REST) is a 501c3 faith-based nonprofit organization in Seattle, WA working to provide a path to freedom, safety and hope for victims of sex trafficking and people involved in the sex trade through direct services, prevention, mentorship, restorative housing, case management, educational assistance and demand reduction efforts.

Redeem The Shadows (RTS) is a 501(c)3 faith based non-profit organization that combats human trafficking through awareness, prevention and rehabilitation (www.redeemtheshadows.com); 95. Redlight Children Campaign, a non-profit organization created by New York lawyer and president of Priority Films Guy Jacobson and Israeli actress Adi Ezroni in 2002 to combat worldwide child sexual exploitation and human trafficking; 96. Redlight Traffic, a 501(c)(3) non-profit that uses technology to unite organizations, communities, and individuals and say "NO" to human trafficking

Ricky Martin Foundation, an organization with the mission to advocate for the well-being of children around the world

Ride for Refuge, a cycling event that raises awareness and funds for displaced persons, including human trafficking victims. 97. Run 2 Rescue, a 501(c)(3) non-profit organization based in California that reaches, rescues and restores victims of sex

trafficking. www.run2rescue.com Salvando Corazones is a 501(c)(3) non-profit organization that runs safe houses and is dedicated to the fight against human trafficking in Costa Rica. 98. Seeds of Hope Homes, INC, a 501 (c) 3 non-profit organization under Hands Up High Ministries which exists to educate, rehabilitate and eradicate sex trafficking. www.seedsofhome.com. 99.

Shared Hope International, a 501 (c) 3 non-profit organization which exists to rescue and restore women and children in crisis. 100. Silent Integrity (<http://silentintegrity.org.au>) is a not for profit organization (Incorporation No.A0057776M).

101. Slavery Footprint, a nonprofit organization based in Oakland, California that works to end human trafficking and modern-day slavery; 102. Slavery Report, a nonprofit organization based in Northern Virginia that works to maximize human trafficking reporting; 103. Somaly Mam Foundation, a registered 501(c)(3) nonprofit organization focused on combating the global sex slave trade through supporting the rescue, rehabilitation, and reintegration of the victims and through raising global awareness on the issue; 104. STAT NC (Stand Against Trafficking), a registered 501(c)(3) non profit organization dedicated to the healing and restoration of women who have been rescued from human trafficking. (<http://www.standagainstraffickingnc.org>) STIGMA, a Cyprus non-profit organisation for Anti-Trafficking and Protection of Victims of Sexual Abuse & Exploitation 105. Stop Child Trafficking Now, an organization founded by Lynette Lewis, an author and public speaker; 106. Stop the Traffik, a campaign coalition which aims to bring an end to human trafficking worldwide; 107. The Defender Foundation, a 501(c)3 Non-Governmental Agency formed to fight human trafficking through active activism of volunteers and tactical rescue teams (Shield Teams) who physically rescue victims both in the U.S. and worldwide; 108. The Protection Project, a 501(c)3 Non-Governmental organization

based at the Johns Hopkins University, School of Advanced International Studies in Washington DC which advises governments on drafting and implementing anti-trafficking legislation and promotes the inclusion of trafficking in the curriculum of universities around the world

Third World Movement Against the Exploitation of Women, an organization directed towards the liberation of women from all kinds of oppression and exploitation based on sex, race or class;

109. Tiny Hands International, a Christian nonprofit organization dedicated to helping orphaned and abandoned children and fighting sex trafficking in South Asia;

110. Traffic J.A.M., International is a 501(c)3 dedicated to preventing commercial sexual exploitation in countries of origin through grass roots networks. Awareness cells are working in Universities, bus stations, plazas, elementary & secondary schools, markets, among taxi drivers & hotel staff ... Websites in English: ijamtraffic.com and in Spanish ijamtraffic.net;

111. Truckers Against Trafficking, a nonprofit organization that trains truck drivers to recognize and report instances of human trafficking;

112. Unlikely Heroes, an international, non-profit organization based in Los Angeles, CA that rescues and restores child victims of sex slavery worldwide, founded by Erica Greve;

113. Visayan Forum Foundation, a non-profit, non-stock and tax-exempt non-government organization in the Philippines established in 1991

Vital Voices, an international, non-profit, non-governmental organization that works with women leaders in the areas of economic empowerment, women's political participation, and human rights;

114. Wipe Every Tear (www.WipeEveryTear.org) rescues precious girls and women trafficked in the sex trade in South East Asia;

115. WalkFree (www.walkfree.org) is an international movement to end modern slavery worldwide.

116. Walk With Me Canada Victim Services, Canada based, providing victim services for survivors of human trafficking.

117. M.A.T.H. Mothers Against Trafficking Humans

(Canada). 118. World Orphans, an organization that funds the creation of orphanages in developing countries. 119. Sea Coast (SC) 120. Clean Services Society (UT) 122. Bethel Church (CA); 123. Oasis Center (CA); 124. Reform University Ministries; 125. Campus Crusade for Christ; Think Atomic (Utah); 126. Net Nanny (UT); 127. Content Watch; 128. Covenant Eyes.

21. Pursuant to 28 U.S.C. § 2201, that this Court declare that defendants are liable, jointly and severally, for future costs of the fall out in society that the Defendants have inflicted on private parties and the state and Federal Government.

/s/Chris Sevier Esq./

9 Music Square South 247

Nashville, TN 37203

BPR#026577

Minister License: 7860644

420 w 42 St

NewYork, NY 10065

ghostwarsmusic@gmail.com

615 5004411

1LT 27A

Ghost OP Papa Whiskey

12/17/2014