

(S)

Ⓟ

Ⓟ

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Jason Cobb
828 Weeks St
E Palc Alto, CA 94303
650-323-9155
symmetry_law@ymail.com

Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

EDL

440

JASON COBB

Plaintiff,

vs.

DON ADAMS, JOEL ADAMS,
ALLEN SHUSTER, CHRISTIAN
CONGREGATION OF JEHOVAH'S
WITNESSES, INC.; KINGDOM
SUPPORT SERVICES, INC.;
REGIONAL BUILDING COMMITTEE
OF JEHOVAH'S WITNESSES, INC.;
RELIGIOUS ORDER OF JEHOVAH'S
WITNESSES, INC.; WATCH TOWER
BIBLE AND TRACT SOCIETY OF
PENNSYLVANIA, INC.; ENGLISH
CONGREGATION OF JEHOVAH'S
WITNESSES, MENLO PARK,
CALIFORNIA, INC.; DANIEL
KASSABIAN; THE COUNTY OF
SANTA CLARA; WILLIAM
ANTHONY DIXON; JEFF KEEGAN,
VICTORIA TRASK; THE CITY OF
MENLO PARK; THE COUNTY OF
SAN MATEO; DOES 1 - 100

Defendants.

Civil Action No: **CV 13 4917**

COMPLAINT

COMPLAINT FILED:

1 Plaintiff Jason Cobb for his Complaint against the Defendants listed below alleges as follows:

2 **I. INTRODUCTION**

3 1. In the early 1970s, congress found that organized crime had extensively *infiltrated* and
4 exercised corrupt influence over numerous *legitimate businesses* and labor unions throughout the
5 United States, and hence posed “a new threat to the American economic system.” See S. REP. NO.
6 617, 91st Cong., 1st Sess. at 76-78 (1969) (“S. REP. NO. 91-617”); see also Organized Crime Control
7 Act of 1970, Congressional Statement of Findings and Purpose, Section 904(a) of PUB. L. NO. 91-
8 452, 84 Stat. 922, 947.

9 2. The Senate Report regarding RICO further found that existing remedies are inadequate to
10 *remove criminal influences from legitimate endeavor organizations.*” S. REP. NO. 91-617 at 78.

11 3. The Senate Report states in part: “What is ultimately at stake is not only the security of
12 individuals and their property, but also the viability of our free enterprise system itself. The
13 committee feels, therefore, that much can be accomplished here by adopting the civil remedies
14 developed in the antitrust field to the problem of organized crime.”

15 4. Thus the RICO Act was born and codified in 18 U.S.C. §§ 1961 and 1962.

16 5. The association-in-fact RICO Enterprise identified in this action has infiltrated varied
17 legitimate endeavor corporations sincerely employed by the religious organization known as
18 Jehovah’s Witnesses exploiting the inherent basis of trust and cooperation that exists amongst
19 Jehovah’s Witnesses to the end of developing a network of persons operating as agents of influence,
20 assets or useful idiots within varying religious, governmental, legal, financial and secular capacities.

21 6. This RICO Enterprise leverages its established relationships and contacts in executing acts
22 of fraud, misappropriation, coercion and oppression. Additionally, this Enterprise corruptly influences
23 and conspires with persons beyond its immediate borders as called for, depending on the requirements
24 of a given scheme.

25 7. The principal purposes and objectives of the Enterprise include violations of 18 U.S.C. §§
26 371, 1943 and 1956, fraudulent acquisition of real property under the guise of religious activity, and
27 other forms of fraud. To avoid exposure, obstruction of justice including bribery, undue influence and
28 cover-up schemes are central to the management and operation of the Enterprise, occurring as a
matter of course within its continuing pattern of racketeering activity.

1 8. This action is intended to address acts of racketeering, oppression and harassment
2 committed by the Enterprise ringleaders who have become remiss in their duty to exercise justice and
3 righteousness within the global organization, congregation and family known as Jehovah's Witnesses.

4 **II. THE RICO ENTERPRISE AND ITS MASTER SCHEME**

5 9. As a religious organization, Jehovah's Witnesses sincerely employ varied legitimate
6 endeavor non-profit corporations in the United States and around the world. The bible-based
7 governance model used by this religious organization allows for individuals therein to be entrusted
8 with varying levels of responsibility and authority. Persons in such positions manage and direct others
9 within their oversight. In accord with bible standards, Christians are to be obedient and follow the
10 direction of those taking the lead in the congregation and organization as an expression of their
11 submission to God.

12 10. In this instance, the governance model employed by this religious organization has been
13 exploited by corrupt persons therein and insidiously used to provide the core infrastructure for the
14 association-in-fact RICO Enterprise identified in this action as well as C 12-01372-JSW and
15 C 13-01955-JSW.

16 11. The **Enterprise ringleaders** include kingpin **Don Alden Adams**, President of the
17 Watchtower Bible and Tract Society of Pennsylvania, Inc., his brother **Joel C. Adams**, Vice President
18 of the Christian Congregation of Jehovah's Witnesses, Inc. and **Allen E. Shuster**, Treasurer of the
19 Regional Building Committee of Jehovah's Witnesses, Inc., amongst corporate directors and officers.

20 12. Don Alden Adams, an attorney and experienced litigator, is the chief architect of the
21 fraudulent scheme that is being perpetrated by these ringleaders to the detriment of honest and sincere
22 congregation members throughout the United States and abroad.

23 13. Don Alden Adams has misused the position of responsibility entrusted to him by the
24 *Governing Body of Jehovah's Witnesses* as a means to direct varied persons within the "chain of
25 command" inherently created by the organizational structure employed by Jehovah's Witnesses to
26 knowingly commit acts in furtherance of the scheme.

27 14. Under the direction of the Watchtower Bible and Tract Society of Pennsylvania, Inc.
28 (Don Alden Adams, President), The Christian Congregation of Jehovah's Witnesses, Inc. (Joel C.
Adams, Richard Ashe, Allen E. Shuster) has issued policy letters advising bodies of elders serving in

1 local congregations of Jehovah's Witnesses in the United States of a standing partnership with
2 JP Morgan Chase Bank. Pursuant to such, whenever local elders (e.g.: Ernest Brede; C 13-01955-
3 JSW) engage representatives of the Regional Building Committee of Jehovah's Witnesses, Inc. (e.g.:
4 Allen E. Shuster, Leonardo Trevino) to the end of planning and executing Kingdom Hall (church
5 building) renovation/building projects they are to open a building expense account specifically with
6 Chase Bank even if the non-profit corporation employed by a given local congregation of Jehovah's
7 Witnesses has standing accounts with other financial institutions. In some cases, per the Enterprise'
8 scheme, local Regional Building Committee representatives (e.g.: Leonardo Trevino, Regional
9 Building Committee #7) have submitted inflated bids for Kingdom Hall building projects, that
10 intentionally constitute excessive benefit transactions to the enrichment of corporate insiders, that
11 local congregations are then directed to finance through "voluntary" donations by their body of elders
12 (e.g.: Ernest Brede). When local congregations fail to raise sufficient funds to pay the amount
13 required per the RBC bid, they are directed to obtain a loan from the Christian Congregation of
14 Jehovah's Witnesses, Inc. to finance the building project.

15 15. Within the scheme, "corporate insiders" include compromised officers/members of the
16 non-profit corporations employed by local congregations of Jehovah's Witnesses throughout the
17 United States and compromised officers/members of the non-profit corporations sincerely employed
18 by Jehovah's Witnesses, including the Watchtower Bible and Tract Society of Pennsylvania, Inc., the
19 Christian Congregation of Jehovah's Witnesses, Inc., the Regional Building Committee of Jehovah's
20 Witnesses, Inc. and the Religious Order of Jehovah's Witnesses, Inc.

21 16. The first phase of the scheme involves Enterprise insiders being strategically positioned to
22 assume operational control of existing non-profit corporations, used by individual congregations,
23 under the guise of religious activity, typically pursuant to acts of "church discipline."

24 17. Per organizational directives, congregation elders generally serve as the directors/officers
25 of the non-profit corporations used by individual congregations. When the cited Enterprise ringleaders
26 target a new congregation/corporation for assimilation into its scheme, they will direct elders from
27 one congregation to move to the targeted congregation to execute a takeover from within, which
28 involves arbitrarily removing certain elders from positions of responsibility without scriptural cause
who are not disposed to participate in the Enterprise' scheme.

1 18. Alternatively, traveling representatives of the Christian Congregation of Jehovah's
2 Witnesses, Inc., called circuit overseers, will visit local congregations with directives to remove and
3 replace certain elders in furtherance of the scheme.

4 19. This is what occurred in the Menlo Park Congregation in 2010 thus prompting the filing of
5 C 10-03907-MEJ (aka *Cobb v. Brede I*) and C 12-01372-JSW (aka *Cobb v. JP Morgan Chase I*)

6 20. The newly reconfigured elder body then proceeds to have new directors/officers voted into
7 the corporation, which is a formality since congregation members have a scriptural obligation to
8 follow the direction of the elder body as such is viewed as an expression of God's authority.

9 21. In assuming control of the elder body, Enterprise ringleaders effectively assume control of
10 the non-profit corporation used by the congregation. Next, new corporate by-laws are produced
11 designating the Christian Congregation of Jehovah's Witnesses, Inc. as the beneficiary and recipient
12 of all assets, including any real estate property, if not so designated previously, upon dissolution of
13 the corporation.

14 22. At this point, a Kingdom Hall building/renovation project is proposed by the new elder
15 body to execute the next phase of the scheme. The building project estimate provided by local
16 Regional Building Committee (RBC) representatives will exceed the actual building and/or
17 maintenance needs, thus creating a means to "fleece the flock" by having congregation members
18 donate the required funds to satisfy the inflated estimation. In most cases, local congregations have
19 insufficient funds on-hand to satisfy the Regional Building Committee's excessive estimates and so
20 are directed to obtain loans from the Christian Congregation of Jehovah's Witnesses, Inc. In this way,
21 the Enterprise ringleaders create ongoing revenue streams as local congregations throughout the
22 United States and abroad make monthly loan payments to finance the building projects mandated by
23 their local body of elders, under the direction of the circuit overseer, a representative of the Christian
24 Congregation of Jehovah's Witnesses, Inc. and the local representatives of the Regional Building
25 Committee of Jehovah's Witnesses, Inc.

26 23. Having completed the acquisition of a new non-profit corporation while concurrently
27 initiating a new revenue stream as described, Enterprise ringleaders thereby extend their network of
28 "non-profit" banking accounts used to systematically reposition and shelter liquid assets.

24. Liquid assets filtered through this network of accounts fund nontransparent resource pools

1 that are used at the discretion of the Enterprise ringleaders, to their benefit and that of other corporate
2 insiders under the guise of religious activity, including financial support of members of the *Religious*
3 *Order of Jehovah's Witnesses*. This order includes branch members and staff, missionaries, traveling
4 overseers (circuit overseers), special pioneers and other volunteers. The global designation for such
5 persons is the *Worldwide Order of Special Full-Time Servants of Jehovah's Witnesses*.

6 25. Legitimate arrangements to financially support members of the *Worldwide Order* have
7 been insidiously leveraged as a means to obscure fraudulent activity including recurring acts of self-
8 dealing perpetrated by Enterprise ringleaders, per the scheme. Furthermore, when financial support is
9 actually given to common *Religious Order* members, disbursements occur unevenly and
10 inconsistently due to acts of favoritism, as Defendant Don Adams and his co-conspirators arbitrarily
11 determine which members of the *Religious Order* are more deserving than others.

12 26. Enabling such unlawful conduct by fraudulently acquiring money from sincere
13 congregation members throughout the United States, as described herein, constitutes a surreptitious
14 form of mandated tithing and most directly, theft by trick, which contradicts the bible-based beliefs
15 and practices of Jehovah's Witnesses, as a religious organization. Furthermore, the non-profit
16 corporations sincerely employed by Jehovah's Witnesses, as a religious organization, incur liability,
17 pursuant to said acts of inurement and private benefit, as these corporations are (Internal Revenue
18 Code) Section 501(c)(3) organizations.

19 27. Since its inception, the partnership with Chase Bank, orchestrated by Don Alden Adams
20 has been systematically used within the Enterprise' pattern of racketeering activity in violation of
21 18 U.S.C. §§ 371, 1943 and 1956. Chase Bank, including varied principals therein (e.g.: CEO James
22 Dimon), is aware of the Enterprise' pattern of racketeering activity and willingly participates in the
23 cover-up of such, playing a similar role in this scheme as it did in the so-called *Vatileaks* Scandal of
24 2012, first, by not filing Currency Transaction Reports (CTR) for cash transactions in excess of
25 \$10,000.00, as required by the *Bank Secrecy Act*, second, by not filing Suspected Activity Reports,
26 (SAR) and third by systematically impeding subpoenas seeking the relevant banking records pursuant
27 to acts of collusion with the RICO Enterprise ringleaders cited herein. (See Complaints for federal
28 civil actions C 12-01372-JSW and C 13-01955-JSW).

28 28. The cited acts of religious affinity fraud, theft and extortion would never be tolerated by

1 the *Governing Body of Jehovah's Witnesses* who are righteous, God-fearing men. Consequently, the
2 Enterprise ringleaders have exerted great effort to cover-up their pattern of racketeering activity
3 specifically to hide their wrongdoing from the *Governing Body* who delegate administrative matters
4 to the legal entities sincerely employed by Jehovah's Witnesses, as a religious organization.

5 29. The obstruction scheme prompting this action manifested during the prosecution of federal
6 civil action C 12-01372-JSW. In being threatened by the pleadings and recognizing the key role
7 played by Plaintiff Jason Cobb in prosecuting the case, the Enterprise launched a full assault on
8 Plaintiff in order to force his withdrawal from that action, the withdrawal of his appeal of federal civil
9 action C 11-02496-DMR and the withdrawal of state civil action CIV 508137, through a series of
10 systematic attacks on each facet of his life in the attempt to oppress, discredit, neutralize and, in the
11 end, destroy Jason Cobb, making an example of him in order to discourage any further efforts to
12 expose its activities. .

13 30. This action is intended to address the conduct of the Enterprise ringleaders, to the end of
14 fully exposing the Enterprise and its pattern of racketeering activity that threatens to continue.

15 **RICO Defendants**

16 31. The Defendants listed in paragraphs 32 through 41 are persons who have conspired to
17 engage in a pattern of racketeering activity and have committed numerous criminal acts as part of a
18 scheme to defraud and injure Plaintiff Jason Cobb without due cause. These Defendants, listed in
19 alphabetical order by last name, constitute the "RICO Defendants" and/or "Enterprise members."
20 Furthermore, these same Defendants are also cited as direct perpetrators and/or conspirators regarding
21 the specified violations of 42 U.S.C. §§ 1983 and 1985.

22 32. Defendant Don Adams is the kingpin of the association-in-fact RICO Enterprise identified
23 herein and the architect of the master scheme currently serving as the chief executive officer for the
24 Watchtower Bible and Tract Society of Pennsylvania, Inc. He has drawn upon his experience as a trial
25 lawyer to conceive, direct and and execute the legal-based attack against Plaintiff.

26 33. Defendant Joel Adams serves on the Service Department Committee and as a vice
27 president for the Christian Congregation of Jehovah's Witnesses, Inc. As an Enterprise ringleader, he
28 participates in the management and operation of the Enterprise.

34. Defendant Allen Shuster works in the Service Department and serves as a vice president

1 and treasurer for the Regional Building Committee of Jehovah's Witnesses, Inc., a subsidiary of
2 Kingdom Support Services, Inc. As an Enterprise ringleader, he participates in the management and
3 operation of the Enterprise.

4 35. Daniel Kassabian is a deputy district attorney for Santa Clara County who was unduly
5 influenced to obstruct justice during the investigation and prosecution of criminal case B1262610 in
6 violation of Plaintiff's Fourteenth Amendment right to due process and equal protection under law in
7 2013.

8 36. English Congregation of Jehovah's Witnesses, Menlo Park, California, Inc. was a
9 legitimate endeavor domestic non-profit corporation sincerely employed by the English – Menlo Park
10 Congregation for decades prior to the arrival of the Enterprise' agents who came specifically to
11 execute a fraudulent scheme at the expense of honest and sincere members. Since the arrival of said
12 agents in May 2010, the corporation has incurred vicarious liability, as a matter of course, pursuant to
13 the legal principles of *Respondeat Superior*, Apparent Authority and Collective Knowledge.

14 37. The Christian Congregation of Jehovah's Witnesses, Inc. is a legitimate endeavor
15 domestic non-profit corporation sincerely employed by the religious organization known as Jehovah's
16 Witnesses that has been victimized by the RICO Enterprise' corruptive influence thus incurring
17 vicarious liability pursuant to the legal principles of *Respondeat Superior*, Apparent Authority and
18 Collective Knowledge. In being named as a defendant, the honest, sincere persons employed by this
19 corporation should become aware of the egregious acts committed by the Enterprise and its members
20 and rectify such.

21 38. Kingdom Support Services, Inc. is a legitimate endeavor domestic non-profit corporation
22 sincerely employed by the religious organization known as Jehovah's Witnesses that has been
23 victimized by the RICO Enterprise' corruptive influence thus incurring vicarious liability pursuant to
24 the legal principles of *Respondeat Superior*, Apparent Authority and Collective Knowledge. In being
25 named as a defendant, the honest, sincere persons employed by this corporation should become aware
26 of the egregious acts committed by the Enterprise and its members and rectify such.

27 39. Regional Building Committee of Jehovah's Witnesses, Inc. is a legitimate endeavor
28 domestic non-profit corporation sincerely employed by the religious organization known as Jehovah's
Witnesses that has been victimized by the RICO Enterprise' corruptive influence thus incurring

1 vicarious liability pursuant to the legal principles of *Respondeat Superior*, Apparent Authority and
2 Collective Knowledge. In being named as a defendant, the honest, sincere persons employed by this
3 corporation should become aware of the misconduct of the Enterprise and its members and rectify
4 such.

5 40. Religious Order of Jehovah's Witnesses, Inc. is a legitimate endeavor domestic non-profit
6 corporation sincerely employed by the religious organization known as Jehovah's Witnesses that has
7 been victimized by the RICO Enterprise' corruptive influence thus incurring vicarious liability
8 pursuant to the legal principles of *Respondeat Superior*, Apparent Authority and Collective
9 Knowledge. In being named as a defendant, the honest, sincere persons employed by this corporation
10 should become aware of the misconduct of the Enterprise and its members and rectify such.

11 41. Watchtower Bible and Tract Society of Pennsylvania, Inc. is a legitimate endeavor
12 domestic non-profit corporation sincerely employed by the religious organization known as Jehovah's
13 Witnesses that has been victimized by the RICO Enterprise' corruptive influence thus incurring
14 vicarious liability pursuant to the legal principles of *Respondeat Superior*, Apparent Authority and
15 Collective Knowledge. In being named as a defendant, the honest, sincere persons employed by this
16 corporation should become aware of the misconduct of the Enterprise and its members and rectify
17 such.

18 **NON-RICO Defendants**

19 42. William Anthony Dixon is a member of the Menlo Park Police Department who is
20 participating in the investigation for case 11-973. He is complicit in the violations of Plaintiff's civil
21 rights.

22 43. Jeff Keegan is a former member of the Menlo Park Police Department who participated in
23 the investigation of case 11-973 before retiring in December 2011. He is complicit in the violations of
24 Plaintiff's civil rights.

25 44. Victoria Trask is a member of the Menlo Park Police Department who participated in the
26 scheme to retaliate against Plaintiff, under color of law, for exercising his First Amendment rights by
27 suing the City of Menlo Park and its agents as well as San Mateo County District Attorney Stephen
28 Wagstaffe and his office. She is complicit in the violations of Plaintiff's civil rights.

45. The City of Menlo Park is a municipality operating and doing business within Menlo Park,

1 CA that has discriminated against Plaintiff Jason Cobb in violation of his civil rights. Through its
2 agents, the City has played a leading role in the defamation scheme against Plaintiff and in the
3 campaign of obstruction.

4 46. The County of San Mateo is a governmental agency operating within Redwood City, CA
5 that has discriminated against Plaintiff Jason Cobb in violation of his civil rights. Through its agents,
6 the County has played a leading role in the defamation scheme against Plaintiff and in the campaign
7 of obstruction.

8 47. The County of Santa Clara is a local government agency operating within San Jose, CA
9 that, has acted with discriminatory intent against Plaintiff Jason Cobb. Through its agents, the County
10 has played a leading role in the defamation scheme against Plaintiff and in the campaign of
11 obstruction.

12 III. SUBJECT MATTER JURISDICTION AND VENUE

13 48. Plaintiff's first claim for relief arises under the Civil Rights Act, which "expressly gives
14 the District Court Jurisdiction, no matter how imperfectly the claim is stated." - *Harmon v. Superior*
15 *Ct of the State of California*, 307 F 2d 796, CA 9(1962)

16 49. Furthermore, this Court has subject matter jurisdiction over Plaintiff's claims under 28
17 U.S.C. §§ 1331 and 1332, and under 18 U.S.C. § 1964(c).

18 50. Plaintiff's sixth claim for relief arises under 18 U.S.C. § 1961 *et seq.*, as hereinafter more
19 fully appears. Additionally, the amount in question exceeds \$75,000, exclusive of interest and costs.
20 Plaintiff's state law claims arise out of the same case or controversy as their federal law claims, as all
21 claims in this action, arise out of a common nucleus of operative facts. Thus, this Court also has
22 supplemental jurisdiction over Plaintiff's state law claims under 28 U.S.C. § 1367.

23 51. Venue is proper in this District under 28 U.S.C. § 1391(b)(2), as a substantial number of
24 the events giving rise to this action occurred in this District, and also under 18 U.S.C. § 1965.

25 IV. PERSONAL JURISDICTION

26 52. Pursuant to the provisions of 18 U.S.C. § 1965(a), § 1965(b) and 28 U.S.C. § 1391(b)(2),
27 exercise of jurisdiction over Defendant Don Adams is proper in this District as the ends of justice
28 require such (Butcher's Union Local No. 498, 788 F. 2d at 539). Defendant Adams is a ringleader

1 within the scheme described herein.

2 53. Pursuant to the provisions of 18 U.S.C. § 1965(a), § 1965(b) and 28 U.S.C. § 1391(b)(2),
3 exercise of jurisdiction over Defendant Joel Adams is proper in this District as the ends of justice
4 require such (Butcher's Union Local No. 498, 788 F. 2d at 539). Defendant Adams is a ringleader
5 within the scheme described herein.

6 54. Pursuant to the provisions of 18 U.S.C. § 1965(a), § 1965(b) and 28 U.S.C. § 1391(b)(2),
7 exercise of jurisdiction over Defendant Allen Shuster is proper in this District as the ends of justice
8 require such (Butcher's Union Local No. 498, 788 F. 2d at 539). Defendant Shuster is a ringleader
9 within the scheme described herein.

10 55. Pursuant to the provisions of 18 U.S.C. § 1965(a), exercise of jurisdiction over English
11 Congregation of Jehovah's Witnesses, Menlo Park, California, Inc. is reasonable and proper in this
12 District because it has agents and transacts its affairs within the Northern District of California.

13 56. Pursuant to the provisions of 18 U.S.C. § 1965(a), exercise of jurisdiction over The
14 Christian Congregation of Jehovah's Witnesses, Inc. is reasonable and proper in this District because
15 it has agents and transacts its affairs within the Northern District of California.

16 57. Pursuant to the provisions of 18 U.S.C. § 1965(a), exercise of jurisdiction over Kingdom
17 Support Services, Inc. is reasonable and proper in this District because it has agents and transacts its
18 affairs within the Northern District of California.

19 58. Pursuant to the provisions of 18 U.S.C. § 1965(a), exercise of jurisdiction over Regional
20 Building Committee of Jehovah's Witnesses, Inc. is reasonable and proper in this District because it
21 has agents and transacts its affairs within the Northern District of California.

22 59. Pursuant to the provisions of 18 U.S.C. § 1965(a), exercise of jurisdiction over Religious
23 Order of Jehovah's Witnesses, Inc. is reasonable and proper in this District because it has agents and
24 transacts its affairs within the Northern District of California.

25 60. Pursuant to the provisions of 18 U.S.C. § 1965(a), exercise of jurisdiction over
26 Watchtower Bible and Tract Society of Pennsylvania, Inc. is reasonable and proper in this District
27 because it has agents and transacts its affairs within the Northern District of California.

28 61. Pursuant to the provisions of 18 U.S.C. § 1965(a) and 28 U.S.C. § 1391(b)(2), exercise of
jurisdiction over Defendant Daniel Kassabian is reasonable and proper in this District because he

1 resides and conducts business within Northern California. Through his activities in California,
2 Defendant Kassabian is a participant within the scheme described herein.

3 62. Pursuant to the provisions of 18 U.S.C. § 1965(a), § 1965(b) and 28 U.S.C. § 1391(b)(2),
4 exercise of jurisdiction over Defendant County of Santa Clara is proper in this District as the ends of
5 justice require such (Butcher's Union Local No. 498, 788 F. 2d at 539). This Defendant is a
6 participant within the scheme described herein.

7 63. Pursuant to the provisions of 18 U.S.C. § 1965(a) and 28 U.S.C. § 1391(b)(2), exercise of
8 jurisdiction over Defendant William Anthony Dixon is reasonable and proper in this District because
9 he resides and conducts business within Northern California. Through his activities in California,
10 Defendant Dixon is a participant within the scheme described herein.

11 64. Pursuant to the provisions of 18 U.S.C. § 1965(a), § 1965(b) and 28 U.S.C. § 1391(b)(2),
12 exercise of jurisdiction over Defendant Jeff Keegan is proper in this District as the ends of justice
13 require such (Butcher's Union Local No. 498, 788 F. 2d at 539). Through his activities in California,
14 Defendant Keegan is a participant within the scheme described herein.

15 65. Pursuant to the provisions of 18 U.S.C. § 1965(a) and 28 U.S.C. § 1391(b)(2), exercise of
16 jurisdiction over Defendant Victoria Trask is reasonable and proper in this District because s resides
17 and conducts business within Northern California. Through her activities in California, Defendant
18 Trask is a participant within the scheme described herein.

19 66. Pursuant to the provisions of 18 U.S.C. § 1965(a) and 28 U.S.C. § 1391(b)(2), exercise of
20 jurisdiction over Defendant City of Menlo Park is reasonable and proper in this District because this
21 municipality conducts business within Northern California. Through its activities in California this
22 Defendant is a participant within the scheme described herein.

23 67. Pursuant to the provisions of 18 U.S.C. § 1965(a) and 28 U.S.C. § 1391(b)(2), exercise of
24 jurisdiction over Defendant County of San Mateo is reasonable and proper in this District because this
25 agency conducts business within Northern California. Through its activities in California this
26 Defendant is a participant within the scheme described herein.

27 **V. FACTUAL BASIS FOR CLAIMS**

28 68. In 2000, the religious organization known as Jehovah's Witnesses underwent extensive
restructuring. During this time the *Governing Body of Jehovah's Witnesses* approved the formation of

1 new corporations to care for legal and administrative needs here in the United States. These
2 corporations include the Christian Congregation of Jehovah's Witnesses, Inc. (CCJW), Religious
3 Order of Jehovah's Witnesses, Inc. (ROJW), Kingdom Support Services, Inc. (KSS) and the Regional
4 Building Committee of Jehovah's Witness, Inc. (RBC) in addition to the long-standing corporations,
5 namely the Watch Tower Bible and Tract Society of Pennsylvania, Inc. (WBTS-PA) and the
6 Watchtower Bible and Tract Society of New York, Inc. (WTBS-NY). (Note: Each of these
7 corporations will hereinafter be referred to by the acronyms specified respectively in the preceding
8 sentence).

9 69. At this point the saying "when the parents are away, the kids will play" took effect. With
10 members of the *Governing Body* resigning as directors/officers of the corporations to focus
11 exclusively on spiritual matters, the Enterprise ringleaders assumed greater autonomy within the
12 corporations.

13 70. The sphere of influence possessed by these men as corporate directors/officers was
14 bolstered by their existing stature within the religious organization. "The Adams Boys" – a collective
15 reference to Don, Joel and the late Karl Adams, all brothers, are known throughout the organization,
16 especially in the "Bethel" facilities (U.S. Headquarters). Don Adams has served as a zone overseer
17 and a member of the executive office (WBTS – PA). Joel Adams is a principal member of the
18 CCJW's Service Department Committee which is empowered to make organizational policy
19 decisions. The late Karl Adams served as a principal in the Writing Department which oversees the
20 development of bible-based literature that is used and distributed globally.

21 71. In misusing their authority and influence, "The Adams Boys" constitute the point of origin
22 for the association-in-fact RICO Enterprise identified herein, devising and systematically executing
23 the scheme, as described, under the guise of religious activity.

24 72. In eventually executing its scheme in the case of the Menlo Park Congregation of
25 Jehovah's Witnesses, the Enterprise picked the proverbial "wrong house" to rob, thus initiating the
26 present conflict.

27 73. In 2008, at the direction of the Enterprise, CCJW representatives Alan Shuster and
28 Richard Ashe assigned Paul Koehler, a traveling field representative, to the San Francisco bay area.
His initial visit to the Menlo Park congregation occurred during October 2008.

1 74. Paul Koehler became actively involved in the renovation planning meetings the Menlo
2 Park Congregation elders had with local representatives of the Regional Building Committee, Inc.
3 Then, contrary to organizational protocol, he attempted to assume control of the meetings and overall
4 project. Thereafter RBC representatives, including RBC #7 Chairman Leonardo Trevino, provided
5 inflated project estimates that increased with each discussion finally reaching a sum in excess of
6 \$350,000. Maximizing the investment in the property to increase its resale value was represented as
7 the justification for the excessive project estimate, in furtherance of the scheme.

8 75. The RBC, Paul Koehler and members of both the Spanish and Japanese Menlo Park
9 congregations agreed to the proposal. However, none of them owned the property. The Menlo Park
10 Congregation of Jehovah's Witnesses, Inc. (Corporate Entity No: C0983980; Congregation No:
11 19059) owned the property with George T. Stock, W. Arlen St. Clair and Plaintiff occupying legal
12 positions within the corporation.

13 76. Plaintiff and his fellow elders were not in favor of the project plan viewing the project cost
14 as excessive. Furthermore, the congregation/corporation members, who shoulder the expenses, were
15 not in favor of the expensive estimates provided by the RBC representatives.

16 77. The collective view of Plaintiff and his fellow elders was not well received by Paul
17 Koehler et al. prompting the Enterprise to arbitrarily remove them under the guise of an act of "church
18 discipline" in furtherance of the scheme. (See *Cobb et al. v. Brede et al.*; C 10-03907-MEJ).

19 78. Pursuant to acts of Serbian Collusion and Serbian Fraud, CCJW representatives Allen
20 Shuster and Richard Ashe notified Plaintiff and his fellow elders, in a letter dated May 24, 2010, that
21 they would be removed from positions of spiritual oversight in the Menlo Park Congregation effective
22 July 1, 2010.

23 79. Paul Koehler then demanded that Plaintiff and the other elders/officers sign off on the
24 merger of the Redwood City South and Menlo Park Congregations and then formally resign from
25 their corporate positions, designating Brede et al. as the new officers/directors for the Menlo Park
26 Corporation. Sensing foul play with fraudulent intent, Plaintiff and his fellow elders/officers refused
27 to do so. Consequently, the Enterprise ringleaders directed Paul Koehler and Ernest Brede et al. to
28 harass Plaintiff and the other elders/officers with specific intent to drive them out of the congregation
and corporation so that the new body of elders, Ernest Brede et al., could inherit the vacated corporate

1 positions and then proceed unimpeded. However, Plaintiff and his fellow officers did not abandon the
2 corporation.

3 80. Plaintiff and his fellow elders sent letters of concern regarding the conduct of their
4 representatives, including Paul Koehler, Steve Misterfeld and Leonardo Trevino, amongst others, to
5 the CCJW. However, the lack of corrective action from the CCJW ratified the actions of such persons
6 (Exhibit 1).

7 81. On July 1, 2010, Ernest Brede et al began to occupy spiritual positions within the
8 congregation as opposed to legal positions within the corporation. However, on July 9, 2010, despite
9 having no legal authority or standing in the Menlo Park Corporation, Ernest Brede, Luis Contreras
10 and Donald Showers visited a Chase Bank branch in Redwood City, CA and used a California
11 Business Portal printout with Plaintiff Jason Cobb's corporate/personal information to represent that
12 they had legal standing in the Menlo Park Corporation to the end of opening acct number xxxxx2300,
13 which constituted an act of business identity theft.

14 82. On July 12, 2010, Ernest Brede et al, in league with Glenn M. Watson, who had been
15 entrusted with bank account duties by the actual Menlo Park Corporation directors years ago, also
16 added their names to existing Wells Fargo Bank checking account #87894705. At the same time,
17 Mr. Brede et al *removed* Plaintiff's name and that of the other legitimately authorized signer(s) from
18 this account. Thereafter, in and around the first or second week in November 2010, Mr. Brede took
19 the stage during an evening service and advised the congregation members that the total funds on-
20 hand in the operating fund was \$3,500.00, which caused a disturbance amongst the members who
21 knew that that figure was much too low based on past financial reports. At the conclusion of the
22 program, when asked by concerned members about the reported amount, Mr. Brede directed
23 individuals to Plaintiffs as well as W. Arlen St. Clair and Georg T. Stock inferring that they were
24 responsible for the missing funds.

25 83. The November bank statements establish that this report was false. As of November 2010,
26 the funds within all known Wells Fargo accounts totaled \$20,144.08 (Exhibit 2). When delivering the
27 erroneous financial report, Mr. Brede referenced plans to renovate the Menlo Park Corporation
28 meeting facility in light of the now apparent "need" for members to intensify their efforts to donate to

1 the building fund since, per his report, the corporation had less money than previously thought.
2 Mr. Brede's report to the members was a materially false report as to the financial condition of the
3 corporation that also had a tendency to induce contributions.

4 84. Upon returning home from southern California in early 2011, Plaintiff learned of the
5 illegitimate corporate meeting held on 12/16/2010. He then researched the status of the corporation
6 confirming that he, George Stock and W. Arlen St. Clair remained the officers/directors of record.
7 Next, Plaintiff conferred with the actual board of directors the evening of April 8, 2011 reaching a
8 decision to remove Mr. Brede, Don Showers and Glenn M. Watson from the Wells Fargo accounts
9 and add Plaintiff Jason Cobb as a signer. Plaintiff then visited Wells Fargo, presented the director's
10 resolution and initiated the process to assume control of these accounts.

11 85. In gaining immediate access to all accounts, except Acct No: 87894705 as this had to be
12 updated manually per Wells Fargo, Plaintiff was able to view the statements on-line. In doing so, he
13 noted that \$15,000.00 was withdrawn from the original operating fund (Acct No: 87894705) on July
14 12, 2010. Next, on July 13, 2010, \$14,900.00 was used to open a new checking account,
15 #1940935883 & the remaining balance of \$100.00 was used to open a new savings account,
16 #9841455224.

17 86. Account #1940935883 became the new functional operating. In addition to acts of
18 misappropriation, recurring transactions indicative of laundering were noted in several accounts.

19 87. Concerned by these findings, Plaintiff went to the Menlo Park Police Department, Spoke
20 with Commander Romero who then referred the matter to Defendant Jeff Keegan, a specialist in
21 corporate fraud and white collar crime cases. Based on a series of discussions, Defendant Keegan
22 eventually outlined a range of offenses which included identity theft, false financial statement and
23 embezzlement (Note: The *full range of offenses* that were identified and discussed with Defendants
24 Keegan and Dixon is found within Exhibit 3).

25 88. When advised of Plaintiff's intervention, Mr. Brede immediately recorded a new property
26 deed on April 18, 2011, putting such in the name of the new corporation name that was unlawfully
27 assumed pursuant to their coup.
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

89. Next, Mr. Brede and Don Showers filed a report with the Menlo Park Police Department falsely accusing Plaintiff of theft. In voluntarily speaking with Defendant Keegan, Plaintiff provided bank records confirming that he had committed no acts of theft and stated that it would be necessary for them to obtain records for Chase account xxxxx2300 to investigate the allegations regarding Ernest Brede et al.

90. In May 2011, Defendant Keegan advised Plaintiff that he had received extensive documentation from Anthony Smith represented as establishing the legitimacy of Ernest Brede et al.'s actions to date specific to the banking activity and corporate appointments etc. The documentation represented that Ernest Brede et al. had legal standing within the Menlo Park Corporation as of December 16, 2010, the date of the fraudulent corporate meeting. At this point, Defendant Keegan requested any documentation that established their legal standing in July 2010, prior to the transactions they executed on behalf of the Menlo Park Corporation at both Chase and Wells Fargo. Defendant Keegan then advised Plaintiff that a response from Anthony Smith was still pending, which made sense from Plaintiff's standpoint as he already knew that Mr. Smith would not be able to provide the requested documentation as such did not exist.

91. At this critical juncture in case 11-973, all communications from Defendant Keegan ceased as he cut off communications and began systematically avoiding Plaintiff.

92. Plaintiff visited the Menlo Park PD station and spoke with Defendant Keegan's supervisor, Defendant Dixon, to obtain the case status. Thereafter, Plaintiff received no update regarding the case from the Menlo Park Police Department until receiving a copy of the letter contained in Exhibit 4.

93. This response fails to address the full scope of Plaintiff's allegations. The response represents that concerns of embezzlement constituted the sole complaint to the Menlo Park Police Department, which is incorrect as Plaintiff also expressed concerns regarding business identity theft, money laundering and theft by trick, amongst other things (Exhibit 3). No further bank records are needed to address the concern of theft by trick, a violation of CA Penal Code 484. The Menlo Park Police Department has had copies of the bank records refuting the financial report given by Ernest

1 Brede since April 2011. Yet this concern, as well as others reported by Plaintiff, have not been
2 addressed (Exhibit 3).

3 94. Frustrated by the pace of the investigation for case 11-973, Plaintiff submitted a formal
4 case request to the District Attorney's Office for San Mateo County. However, the DA's office
5 declined his request for an investigation July 27, 2011 (Exhibit 5).

6 95. Plaintiff and Jonathan Cobb, Sr. then met with Menlo Park PD representatives
7 Commander Lacey Burt and Commander Romero in August 2011 to discuss the status of case 11-973.

8 96. During this discussion, Plaintiff asked whether Commander Burt had contacted the CCJW
9 as Defendant Keegan had early on in his investigation. Commander Burt deflected the question
10 stating that the CCJW did not share the same concerns regarding Ernest Brede's alleged conduct.
11 Commander Burt then asked Plaintiff, rhetorically, "If your headquarters isn't concerned about this
12 situation, why are you?"

13 97. Commanders Burt and Romero stated that their hands were tied and deferred to the DA's
14 refusal to investigate the matter further, which continued the manufactured impasse for case 11-973
15 which continued through December 2011 when Defendant Keegan retired to the present time. The
16 most recent update coming from Defendant Dixon on February 14, 2013 where he confirms referring
17 Plaintiff's request for information concerning the case to the city attorney's office.

18 98. Case 11-973 is a threat to the Enterprise as it could expose the broader national scheme
19 regarding violations of 18 U.S.C. §§ 1943 (Wire Fraud) and 1956 (Laundering of Monetary
20 Instruments). If fully investigated and prosecuted, the case would expose Enterprise agents Ernest
21 Brede, Don Showers and others in the religious organization of being guilty of criminal conduct. Such
22 exposure would force these agents out of the Menlo Park congregation, and likely the entire
23 organization, which would constitute an admission of wrongdoing, something the Enterprise has
24 worked very hard to avoid in orchestrating the current cover-up. Furthermore, losing lower rung
25 Enterprise members like Ernest Brede et al., would disrupt the operations of the master scheme in this
26 locale as such is functionally executed through designated participants as opposed to any and all
27 members of a given congregation, being insidiously subversive and clandestine in nature. This
28

1 explains why the Enterprise ringleaders were compelled to stop Menlo Park PD case 11-973 by any
2 means necessary.

3 99. Defendant Don Adams, the Enterprise kingpin, personally neutralized this threat in June
4 2011 when he visited the San Francisco bay area. During this trip he met with CCJW attorney
5 Anthony Smith for a status report. Then Defendant Adams authorized and financed the payoff CCJW
6 attorney Anthony Smith delivered to Defendants Keegan and Dixon to hinder Menlo Park PD case
7 11-973. In delivering the funds, per Defendant Adams directives, Anthony Smith warned that any
8 involvement from the police department resulting in the acquisition of incriminating evidence
9 exposing the Enterprise or its agents would result in litigation from the CCJW's frontline attorneys, an
10 effective threat since Defendant Keegan expressed concern regarding this possibility during the
11 investigation after he called and spoke with CCJW representatives by phone.

12 100. Anthony Smith, who practices corporate law, then explained the import of CA
13 Corporations Code §§ 5527 and 5617, which state:

14 101. 5527 - An action challenging the validity of any election, appointment or removal of a
15 director or directors must be commenced within nine months after the election, appointment or
16 removal. If no such action is commenced, in the absence of fraud, any election, appointment or
17 removal of a director is conclusively presumed valid nine months thereafter.

18 102. 5617(a) - Upon the filing of an action therefor by any director or member, or by any
19 person who had the right to vote in the election at issue, the superior court of the proper county shall
20 determine the validity of any election or appointment of any director of any corporation.

21 103. The Menlo Park police Department was not only to suspend active investigation of case
22 11-973 pursuant to the payoff but they were also to discontinue any further communication with
23 Plaintiff Jason Cobb until the nine month deadline to passed on September 16, 2011. Once the
24 deadline had passed, Ernest Brede et al.'s corporate appointments would have been "conclusively
25 presumed valid" under law, effectively rendering several of their reported actions as non-crimes.

26 104. However, Plaintiff Jason Cobb did file state civil action CIV 508137 pursuant to CA
27 Corp. Code 5617 on September 2, 2011.
28

1 105. The subject matter being considered in state civil action CIV 508137 was relevant to
2 certain issues within federal civil action C 10-03907-MEJ. Consequently, Mrs. Brocka helped to
3 ensure that key hearings in CIV 508137 were scheduled on dates that were advantageous to the
4 Defendants in both civil actions, her fellow Enterprise members. When the enterprise orchestrated a
5 settlement conference in C 10-03907-MEJ scheduled to be held on 10/18/11, CCJW attorney Anthony
6 Smith and Mrs. Brocka colluded to the end of ensuring that the hearing date for state civil action CIV
7 508137 was scheduled after 10/18/11 to reduce any point of leverage the Plaintiffs in C 10-03907-
8 MEJ may have had pursuant to the expected ruling in favor of Plaintiff Jason Cobb in CIV 508137.

9 106. When the Plaintiffs in C 10-03907-MEJ did not settle their case on 10/18/11, then the
10 Enterprise, with the support of complicit court employees executed an act of subterfuge to induce
11 Plaintiff Jason Cobb's belief that the next hearing in CIV 508137 would not occur as scheduled. The
12 tentative ruling posted on the Superior Court's website the preceding day stated that the hearing
13 would be taken off-calendar and continued. When Plaintiff attended the hearing expecting affirmation
14 of the tentative ruling he was shocked when the presiding Judge stated that the trial would occur that
15 day and be heard by Judge Kashin. This "bait and switch" maneuver caught Plaintiff off-guard and
16 ill-prepared to argue his case.

17 107. The court ruled in favor of the Defendants in contradiction of state and Constitutional
18 law regarding the application of neutral laws in the case of religious organizations/corporations,
19 especially when property ownership and state governed corporate procedure are at issue. (*Jones v.*
20 *Wolf*, 443 U.S. at 603, 99 S.Ct 3020; *Employment Division v. Smith* (1990); *Maktab Tarighe Oveyssi*
21 *Shah Maghsoudi, Inc. v. Kianfar*, 179 F.3d 1244, 1248 (9th Cir. 1999); *Concord Christian Center v.*
22 *Open Bible Standards Churches* (2005) 132 Cal.App 4th 1396, 1409)) Plaintiff filed his motion for a
23 new trial on February 27, 2012.

24 108. Plaintiff intended to legally affirm his status as the Chairman and CEO of the Menlo Park
25 Corporation to the end of auditing the books and accounts then providing an accurate financial report
26 to the members. In doing so, Plaintiff would have become privy to further evidence of fraud so
27 Defendant Don Adams and the other ringleaders used their agents within the Menlo Park
28 Congregation as well as the Superior Court of California for San Mateo County to prevent Plaintiff
from regaining control of the Menlo Park Corporation.

1 109. During this same time, Plaintiff was finalizing the complaint for federal civil action
2 C 12-01372-JSW (filed on 3/19/2012). Unbeknownst to Plaintiff, his wife, Jennifer Altamirano had
3 been updating her parents (Alfred and Ellen Altamirano) and other congregation members (Ernest
4 Brede, Lawrence Lee, Donald Maynor, Dan Nilges) regarding Plaintiff's progress on the new
5 complaint. Jennifer Altamirano's reports were relayed to Defendant Don Adams and his fellow
6 ringleaders who in turn relayed directives through CCJW field representatives, including Ernest
7 Brede, Dan Nilges and Donald Maynor, for Jennifer Altamirano to execute in the effort to stop
8 Plaintiff.

9 110. Ms. Altamirano and her parents pressured Plaintiff to abandon all litigation. Then
10 Ms. Altamirano, per her directives, solicited prearranged input from the new elder body in the Menlo
11 Park congregation under the guise of seeking marital counseling. The discussions that Plaintiff and his
12 wife had with elders Lawrence Lee and Michael Marchi in April 2012 were not religious. Rather the
13 discussions were used as a means to coerce Plaintiff's abandonment of the legal actions. Furthermore,
14 like Jennifer Altamirano and her parents, Lee and Marchi cited Plaintiff's involvement in the actions
15 as being indicative of mental impairment. They stated that if Plaintiff did not abandon the cases they
16 and Ms. Altamirano would be forced to notify authorities of their concerns regarding his mental
17 health. Such scare tactics were employed to exert coercive pressure on Plaintiff specifically to
18 neutralize the threat said cases presented to the Enterprise.

19 111. When Plaintiff persisted in prosecuting state civil action 508137 and then filed federal
20 civil action C 12-01372-JSW, the Enterprise ringleaders intensified their obstruction scheme by
21 threatening Plaintiff and his father, Jonathan Cobb, then disfellowshipping (excommunicating) them
22 without cause in May 2012. Plaintiff sent a letter of concern regarding these events to the CCJW to no
23 avail.

24 112. The appeal committee designated by Circuit Overseer Dan Nilges affirmed the decision
25 to disfellowship Plaintiff in June 2012. During this hearing, Plaintiff's letter of concern was
26 referenced then dismissed. In affirming the decision, appeal committee chairman Paul Demosthenes
27 advised Plaintiff that he could be reinstated as an active member of the congregation once he
28 withdrew the civil actions of concern. Through these circumstances and agents, the Enterprise
perpetrated acts of extortion and coercion, in the guise of religious activity, in furtherance of its

1 obstruction scheme.

2 113. Enterprise ringleaders then intensified the attack by continuing to use Plaintiff's wife,
3 Jennifer Altamirano, as a "weapon" against him to disrupt his family and personal life specifically to
4 divert his attention from prosecuting the cases against the Enterprise. Ms. Altamirano did so through
5 malicious prosecution, abuse of process and acts of defamation against Plaintiff in the course of the
6 two proceedings she was directed to initiate, family law case 116981 in San Mateo County and
7 criminal case B1262610 in Santa Clara County (See federal civil action C 13-01955-JSW) pursuant to
8 false allegations of domestic violence.

9 114. In criminal case B1262610, Plaintiff was falsely accused of committing battery against
10 Jennifer Altamirano on September 15, 2012.

11 115. This was a planned act of retaliation in response to Plaintiff "blowing the whistle" on the
12 Enterprise' racketeering activity. Jennifer Altamirano and Bill Douglas provided reports to the police
13 falsely accusing Plaintiff of a crime and also directed other persons in the group, including
14 Mr. Samuel Forks, a percipient witness, to do the same in violation of 18 U.S.C. §§ 1503 (omnibus
15 clause) and 1512.

16 116. One week later, Mr. Forks, was approached by Ms. Altamirano and Mr. Douglas and
17 threatened to keep silent regarding the actual facts and to refrain from attending any hearings and
18 providing true testimony regarding the alleged incident of 9/15/2012. Having been intimidated and
19 threatened, when deposed in October 2012, Mr. Forks incorrectly stated that he did not "see anything"
20 and had no basis to refute Jennifer Altamirano's allegation of battery against Plaintiff. Thereafter, he
21 did not attend the domestic violence hearing of 11/28/2012 (San Mateo County) due to being
22 intimidated by Ms. Altamirano and Mr. Douglas. The credibility of Mr. Forks' accurate testimony
23 during the trial for case B1262610 was viciously attacked pursuant to him having been unduly
24 influenced to lie under oath during the October 2012 deposition, which affected the outcome of the
25 trial to Plaintiff's detriment leading to further pecuniary damages to his property interests as stated
26 above.

26 117. Ernest Brede also committed acts of witness tampering regarding another material
27 witness, Ms. Johnson. In speaking with Ms. Johnson on the phone and later in person to discuss the
28 alleged incident of 9/15/2012, Ernest Brede misused his position and influence in the congregation to

1 direct her to attend a meeting he had arranged at the Menlo Park Kingdom Hall (Church building)
2 concerning Jennifer Altamirano's false allegations of battery against Plaintiff to ensure that "everyone
3 was on the same page." Ernest Brede's endeavored to unduly influence Ms. Johnson's statements and
4 testimony to corroborate Ms. Altamirano's false allegations, as had occurred in the case of other
5 witnesses, all members of the Menlo Park Congregation of Jehovah's Witnesses. When Mrs. Johnson
6 declined she was targeted for mistreatment and eventually changed congregations to obtain relief.

7 118. During the trial for case B1262610, Ms. Gladys Hernandez, a percipient witness, had
8 been influenced to affirm the false report she gave to the police on 9/15/2012 by lying under oath
9 specifically to support the equally perjurous testimony given by Jennifer Altamirano and Douglas
10 during the trial. Furthermore, said testimony was supplemented by falsified material evidence
11 misrepresenting the alleged crime scene of 9/15/2012 with specific intent to support their collective
12 lie.

13 119. Santa Clara Deputy DA Daniel Kassabian prosecuted case B1262610 on behalf of the
14 people. Mr. Kassabian stated that he had discussions with Jennifer Altamirano, Bill Douglas, Ernest
15 Brede and other Enterprise members before the trial.

16 120. Pursuant to his career in law enforcement as well as his professional network as a private
17 security consultant (which involves collaboration with law enforcement personnel), enterprise
18 member Bruce Radetich has standing ties to the DA's Office for Santa Clara County. The Enterprise
19 ringleaders used Mr. Radetich as well as attorney Donald H. Maynor, both of whom are Jehovah's
20 Witnesses, to reach a preemptive agreement with the DA's office to maliciously prosecute Plaintiff in
21 September 2012. Thereafter, per directives from the Enterprise ringleaders, agents Jennifer
22 Altamirano and Bill Douglas colluded with Deputy DA Daniel Kassabian in the construction of
23 perjurous testimony intended to align with the misrepresentation of the crime scene pursuant to the
24 evidence falsification scheme.

25 121. The DA's office for Santa Clara County obstructed and unduly influenced the criminal
26 investigation for case B1262610 making its actions subject to review in a court of law. Crime scene
27 photos taken by Officer Gallaher (#1846) of the Santa Clara County Sherriff's Dept on 9/15/2012
28 were digitally altered, after the fact, then reinserted within the investigation file specifically to
manufacture a material basis of plausibility for the initial allegations and the planned perjurous

1 testimony during the trial. During pre-trial discovery, the DA's office for Santa Clara County
2 provided intentionally poor copies of the crime scene photos that were dark and illegible to
3 intentionally obscure the fact that this evidence, which Mr. Kassabian intended to present during the
4 trial, had been falsified. During the trial, clear color copies of the falsified photographs were presented
5 and used to fraudulently impeach Plaintiff's testimony regarding the actual and true events of
6 9/15/2012. The presentation of this falsified evidence influenced the outcome of the trial to Plaintiff's
7 detriment completing the Enterprise' latest act of retaliation and defamation against Plaintiff.

8 122. The false allegations of battery made against Plaintiff on 9/15/2012 led to the issuance of
9 a restraining order against Plaintiff on 11/28/2012 in the Superior Court for California in San Mateo
10 County. This order restrained Plaintiff from making any effort to learn the location of Jennifer
11 Altamirano and Plaintiff's two children.

12 123. In March 2013, Jennifer Altamirano filed a complaint with the Menlo Park Police
13 department alleging that Plaintiff had violated the restraining order during a lawful visit with his
14 children. Ms. Altamirano falsely alleged that Plaintiff attempted to learn where she and the children
15 were living during a discussion with the oldest child. Defendant Victoria Trask opened a case but
16 never contacted Plaintiff during her investigation to validate the allegations. No other adults were
17 present during this conversation. The youngest child was present but did not take note of the
18 discussion and thus had no input. Any assertions from Jennifer Altamirano constitute hearsay as she
19 was not present. Despite these flaws in the case, Defendant Trask presented the case to the DA's
20 office for San Mateo County. The person who received and reviewed the case report is being referred
21 to as John Doe 1. The member of the DA's office who filed charges against Plaintiff based on the
22 report is John Doe 2. No member of the DA's office directed Defendant Trask to contact Plaintiff and
23 obtain a statement as they typically do when reviewing an incomplete police report, especially before
24 filing charges and prosecuting the accused. In contrast, Plaintiff provided extensive documentation,
25 statements and other forms of evidence regarding case 11-973 and the DA's office declined to issue a
26 subpoena and declined to investigate the allegations establishing a different manner of treatment
27 being extended to Plaintiff versus the treatment extended to Ernest Brede in 2011 and Jennifer
28 Altamirano in 2013, who are both Enterprise agents and of Caucasian descent.

124. On 4/29/2013 Plaintiff filed federal civil action C 13-01955-JSW, naming Ms.

1 Altamirano, The City of Menlo Park, San Mateo County, the district attorney and his office as
2 Defendants.

3 125. The week of July 7, 2013, Plaintiff was arrested for failing to appear for an arraignment
4 hearing subsequent to Ms. Altamirano's false allegation. However, Plaintiff was never contacted by
5 the Menlo Park Police department or advised of any hearing date. In short, he did not receive notice in
6 any regard as the actual intent was to manufacture a set of circumstances specifically to have Plaintiff
7 arrested and wrongfully prosecuted in violation of his Fourteenth Amendment right to due process.

8 126. The filing of these charges against Plaintiff, the creation of a case by Menlo Park PD and
9 the DA's decision to file charges in the absence of any investigation are byproducts of the standing
10 conspiratorial alliance between these persons. These acts are in furtherance of the standing violations
11 of civil RICO as well as the standing violations of Plaintiff's Fourteenth Amendment right to equal
12 protection under law and due process. These acts have been performed with specific intent to injure
13 Plaintiff by and through systematic discrimination under color of law in violation of 42 U.S.C. §§
14 1983 and 1985(3).

15 127. These acts further demonstrate specific intent to discriminate against Plaintiff and violate
16 his civil rights in that a clear disparity exists between the actions of the Menlo Park Police department
17 and the DA's office for San Mateo County in this situation, as described, and the willful indifference
18 and overt acts of obstruction under color of law in response to Plaintiff's complaints regarding Ernest
19 Brede et al. in case 11-973, punctuated by the DA's refusal to issue one subpoena regarding Chase
20 account xxxxx2300 prior to refusing Plaintiff's request for an investigation.

21 128. Pursuant to the false charges filed against Plaintiff by Enterprise agent Jennifer
22 Altamirano in March 2013, the DA for San Mateo County willfully prosecuted Plaintiff without the
23 benefit of any investigation by the Menlo Park police department in continuation of its standing
24 support of the Enterprise' campaign of obstruction and retaliation against plaintiff.

25 129. The initial exposure of the Enterprise' scheme in 2010 has been followed by an ongoing
26 campaign of obstruction. Direct attacks have been made against Plaintiff by complicit persons in
27 Plaintiff's own family, in the Menlo Park Congregation of Jehovah's Witnesses, in the counties of
28 Santa Clara and San Mateo and in both state and federal court, including one or more judges.

130. This pattern of racketeering activity has been conceived, directed, ratified and financed

1 by the Enterprise ringleaders which include Defendant Don Alden Adams, President of the
2 Watchtower Bible and Tract Society of Pennsylvania, Inc., his brother Defendant Joel C. Adams,
3 Vice President of the Christian Congregation of Jehovah's Witnesses, Inc. and Allen E. Shuster,
4 Treasurer of the Regional Building Committee of Jehovah's Witnesses, Inc., a subsidiary of Kingdom
5 Support Services, Inc., amongst others.

6 131. Corporations sincerely employed by the religious organization known as Jehovah's
7 Witnesses have been infiltrated and compromised from within due to the corruptive influence of these
8 Enterprise ringleaders and the group of subordinate Enterprise members motivated by deviant
9 religious convictions and misplaced loyalty who have followed the directives of men to the exclusion
10 of both Divine and secular law.

11 VI. CLAIMS FOR RELIEF

12 FIRST CLAIM FOR RELIEF

13 Violations of 42 U.S.C. § 1983 – Count 1

14 (Against Defendants William Anthony Dixon; Jeff Keegan)

15 132. Plaintiff realleges and incorporates herein by reference each and every foregoing
16 paragraph of this Complaint as if set forth in full.

17 133. Under color of law, the Defendants, "persons" within the meaning of 42 U.S.C. § 1983,
18 willfully and with discriminatory intent toward Plaintiff in conjunction with the undue influence
19 exerted by Defendant Don Adams and Mr. Anthony Smith, deprived Plaintiff of his Constitutional
20 right to equal protection under law by agreeing to obstruct the investigation for Menlo Park PD case
21 11-973. In doing so, the Defendants aided and abetted the Enterprise in covering up the reported acts
22 of fraud and in preventing the acquisition of evidence known to be damaging to the Enterprise and its
23 scheme.

24 134. By colluding with the Enterprise in targeting Plaintiff for discriminatory treatment,
25 intentionally treating Plaintiff differently from others similarly situated, which would include Ernest
26 Brede, a Caucasian male, thus depriving Plaintiff of his rights, the Defendants selectively
27 marginalized Plaintiff making him "a class of one." Village of Willowbrook v. Olech, 528 U.S. 562,
28 564, 120 S.Ct. 1073, 1074 (2000) (recognizing equal protection claims brought by a "class of one.").

135. The Defendants' behavior as set forth above was the result of conscious and outrageous

1 indifference to their sworn duty as public servants as well as the welfare of Plaintiff and others so as
2 to establish aggravating circumstances warranting both compensatory and punitive damages.
3 Therefore, pursuant to 42 U.S.C. § 1983, Plaintiff seeks damages of \$250,000 as well as punitive
4 damages according to proof.

5 **Violations of 42 U.S.C. § 1983 – Count 2**

6 **(Against Defendants Victoria Trask; John Doe 1; John Doe 2)**

7 136. Plaintiff realleges and incorporates herein by references each and every foregoing
8 paragraph of this Complaint as if set forth in full.

9 137. Under color of law, Defendants, “persons” within the meaning of 42 U.S.C. § 1983,
10 consciously maliciously filed charges against Plaintiff and moved to prosecute him, thus selectively
11 treating Plaintiff in a manner inconsistent with how others similarly situated in the community are
12 treated.

13 138. This conscious and willful act of discrimination was motivated by racial bias, standing
14 malice toward Plaintiff and a desire to punish him for exercising his First Amendment right to petition
15 when suing the district attorney for San Mateo County and his office, the City of Menlo Park, the
16 police chief and the Mayor in April 2013 (See federal civil action C 13-01955-JSW).

17 139. Contrary to when Plaintiff filed his report for Menlo Park PD case 11-973 in 2011, the
18 Defendants in this instance moved very quickly to act on the report filed by Jennifer Altamirano who
19 is of Caucasian descent and a fellow Enterprise agent. The Defendants and other city and county
20 agents then conspired to manufacture a basis of asserted plausibility for Plaintiff’s arrest in July 2013
21 for failing to appear for a hearing that he was never advised of and that is yet to be proven as ever
22 having been scheduled prior to Plaintiff’s filing of civil action C 13-01955-JSW on 4/29/2013.

23 140. In depriving Plaintiff of his constitutional right to due process and equal protection under
24 law pursuant to said retaliation scheme, the Defendants selectively targeted Plaintiff with
25 discriminatory intent thus making him “a class of one.” Village of Willowbrook v. Olech, 528 U.S.
26 562, 564, 120 S.Ct. 1073, 1074 (2000) (recognizing equal protection claims brought by a “class of
27 one.”).

28 141. The Defendants’ behavior as set forth above was the result of conscious and outrageous
indifference to their sworn duty as public servants, the welfare of Plaintiff and his First and

1 Fourteenth Amendment rights so as to establish aggravating circumstances warranting both
2 compensatory and punitive damages. Therefore, pursuant to 42 U.S.C. § 1983, Plaintiff seeks
3 damages of \$250,000 as well as punitive damages according to proof.

4 **Violations of 42 U.S.C. § 1983 – Count 3**

5 **(Against Defendant Daniel Kassabian; John Doe 3; John Doe 4)**

6 142. Plaintiff realleges and incorporates herein by references each and every foregoing
7 paragraph of this Complaint as if set forth in full.

8 143. Under color of law and office, the Defendants, “persons” within the meaning of 42
9 U.S.C. § 1983, consciously and willfully acted with discriminatory intent in depriving Plaintiff of his
10 Fourteenth Amendment rights to due process and equal protection under law. In comparison with
11 others similarly situated, Plaintiff was selectively treated and said treatment was motivated by
12 Defendants’ agreement to participate in the Enterprise’ defamation campaign against Plaintiff, racial
13 bias, bias against Plaintiff as a pro per litigant and a desire to punish Plaintiff for exercising his First
14 Amendment right to petition when suing the District Attorney’s Office for Santa Clara County in May
15 2013 (See federal civil action C 13-01955-JSW).

16 144. In depriving Plaintiff of his constitutional rights as described, the Defendants selectively
17 targeted Plaintiff with discriminatory intent thus making him “a class of one.” Village of
18 Willowbrook v. Olech, 528 U.S. 562, 564, 120 S.Ct. 1073, 1074 (2000) (recognizing equal protection
19 claims brought by a “class of one.”).

20 145. The Defendants’ behavior as set forth above was the result of outrageous indifference to
21 their sworn duty as public servants, the welfare of Plaintiff and his civil rights so as to establish
22 aggravating circumstances warranting both general and punitive damages. Therefore, pursuant to
23 42 U.S.C. § 1983, Plaintiff seeks damages of \$2,000,000.

24 **SECOND CLAIM FOR RELIEF**

25 **Violations of 42 U.S.C. § 1985 – Count 1**

26 **(Against Defendants Don A Adams, Joel C Adams, Allen Shuster, Christian Congregation of**
27 **Jehovah’s Witnesses, Inc., Kingdom Support Services, Inc., Regional Building Committee of**
28 **Jehovah’s Witness, Inc., Religious Order of Jehovah’s Witnesses, Inc., Watchtower Bible and**
Tract Society of Pennsylvania, Inc., William Anthony Dixon, Jeff Keegan)

1 146. Plaintiff realleges and incorporates herein by references each and every foregoing
2 paragraph of this Complaint as if set forth in full.

3 147. Regarding “Violations of 42 U.S.C. § 1983 - Count 1” set forth above, the Defendants
4 conspired for the purpose of impeding, hindering, obstructing, or defeating the due course of justice
5 concerning Menlo Park PD case 11-973 with intent to deny Plaintiff equal protection under law. The
6 object and purpose of this conspiracy was achieved to the detriment of Plaintiff’s civil rights by and
7 through the successful obstruction of said case, a continuing offense, and the prevention of the
8 acquisition of evidence known to be damaging to the Enterprise and its scheme.

9 148. Defendants share liability as the claim arises out of a common nucleus of operative facts
10 within the nexus of the master scheme described herein.

11 149. In the case of Defendants affiliated with the religious organization known as Jehovah’s
12 Witnesses, Plaintiff seeks nominal damages of \$1.00.

13 150. In the case of all other Defendants, Plaintiff seeks damages of \$500,000.

14 **Violations of 42 U.S.C. § 1985 – Count 2**

15 **(Against Defendants Don A Adams, Joel C Adams, Allen Shuster, Christian Congregation of**
16 **Jehovah’s Witnesses, Inc., Kingdom Support Services, Inc., Regional Building Committee of**
17 **Jehovah’s Witness, Inc., Religious Order of Jehovah’s Witnesses, Inc., Watchtower Bible and**
18 **Tract Society of Pennsylvania, Inc., Victoria Trask; John Doe 1; John Doe 2)**

19 151. Plaintiff realleges and incorporates herein by references each and every foregoing
20 paragraph of this Complaint as if set forth in full.

21 152. Regarding “Violations of 42 U.S.C. § 1983 - Count 2” set forth above, the Defendants
22 conspired for the purpose of violating Plaintiff’s Fourteenth Amendment right to due process and
23 equal protection under law and to retaliate against and punish Plaintiff, under color of law, for
24 exercising his First Amendment right to petition in filing federal civil action C 13-01955-JSW against
25 them and/or related agencies and persons. The object and purpose of this conspiracy was achieved to
26 the detriment of Plaintiff’s civil rights and property interests when, due to discriminatory intent,
27 Defendants refrained from obtaining a statement from Plaintiff in response to the allegations prior to
28 manufacturing a basis of asserted plausibility for Plaintiff’s arrest in July 2013 for failing to appear
for a hearing that he was never advised of.

1 153. Defendants share liability as the claim arises out of a common nucleus of operative facts
2 within the nexus of the master scheme described herein.

3 In the case of Defendants affiliated with the religious organization known as Jehovah's
4 Witnesses, Plaintiff seeks nominal damages of \$1.00.

5 In the case of all other Defendants, Plaintiff seeks damages of \$500,000.

6 **Violations of 42 U.S.C. § 1985 – Count 3**

7 **(Against Defendants Don A Adams; Joel C Adams; Allen Shuster; Christian Congregation of**
8 **Jehovah's Witnesses, Inc.; Kingdom Support Services, Inc.; Regional Building Committee of**
9 **Jehovah's Witness, Inc.; Religious Order of Jehovah's Witnesses, Inc.; Watchtower Bible and**
10 **Tract Society of Pennsylvania, Inc.; English Congregation of Jehovah's Witnesses, Menlo Park,**
11 **California, Inc.; Daniel Kassabian; John Doe 3; John Doe 4)**

12 154. Plaintiff realleges and incorporates herein by references each and every foregoing
13 paragraph of this Complaint as if set forth in full.

14 155. Regarding "Violations of 42 U.S.C. § 1983 - Count 3" set forth above, the Defendants
15 conspired for the purpose of violating Plaintiff's Fourteenth Amendment right to due process and
16 equal protection under law and to retaliate against and punish Plaintiff, under color of law, for
17 exercising his First Amendment right to petition in filing federal civil action C 13-01955-JSW against
18 them and/or their co-conspirators. The object and purpose of this conspiracy was achieved to the
19 detriment of Plaintiff's civil rights and property interests when, due to discriminatory intent,
20 Defendants executed the plan to impede, hinder, obstruct, and defeat the due course of justice
21 regarding both the investigation and prosecution of criminal case B1262610 by and through the
22 evidence falsification scheme described herein.

23 156. Defendants share liability as the claim arises out of a common nucleus of operative facts
24 within the nexus of the master scheme described herein.

25 157. In the case of Defendants affiliated with the religious organization known as Jehovah's
26 Witnesses, Plaintiff seeks nominal damages of \$1.00.

27 158. In the case of all other Defendants, Plaintiff seeks damages of \$500,000.

28 **THIRD CLAIM FOR RELIEF**

Violations of 42 U.S.C. § 1986 – Count 1

1 (Against Defendants Don A Adams; Joel C Adams; Allen Shuster; Christian Congregation of
2 Jehovah's Witnesses, Inc.; Kingdom Support Services, Inc.; Regional Building Committee of
3 Jehovah's Witness, Inc.; Religious Order of Jehovah's Witnesses, Inc.; Watchtower Bible and
4 Tract Society of Pennsylvania, Inc.; English Congregation of Jehovah's Witnesses, Menlo Park,
5 California, Inc.)

6 159. Plaintiff realleges and incorporates herein by references each and every foregoing
7 paragraph of this Complaint as if set forth in full.

8 160. Regarding "Violations of 42 U.S.C. § 1985 Count 2" set forth above, the Defendants
9 assumed a duty to protect the interests and well-being of each organization member, including
10 Plaintiff, and to commission, supervise, retain or remove their agents in accordance with that duty.

11 161. Defendants Don A Adams, Joel C Adams, Allen Shuster and their co-conspirators within
12 the cited corporations knew of the wrongs conspired to be done and possessed the power to prevent or
13 aid in the prevention of said wrongs. However, in being complicit in the master scheme described
14 herein, these Defendants consciously and willfully refused to do so to the detriment of Plaintiff's
15 family and children, as well as his civil rights and property interests.

16 162. Defendants share liability as the claim arises out of a common nucleus of operative facts
17 within the nexus of the master scheme described herein.

18 163. Plaintiff seeks nominal damages of \$1.00.

19 **Violations of 42 U.S.C. § 1986 – Count 2**

20 (Against Defendants Don A Adams; Joel C Adams; Allen Shuster; Christian Congregation of
21 Jehovah's Witnesses, Inc.; Kingdom Support Services, Inc.; Regional Building Committee of
22 Jehovah's Witness, Inc.; Religious Order of Jehovah's Witnesses, Inc.; Watchtower Bible and
23 Tract Society of Pennsylvania, Inc.; English Congregation of Jehovah's Witnesses, Menlo Park,
24 California, Inc.)

25 164. Plaintiff realleges and incorporates herein by references each and every foregoing
26 paragraph of this Complaint as if set forth in full.

27 165. Regarding "Violations of 42 U.S.C. § 1985 Count 3" set forth above, the Defendants
28 assumed a duty to protect the interests and well-being of each organization member, including
Plaintiff, and to commission, supervise, retain or remove their agents in accordance with that duty.

1 166. Defendants Don A Adams, Joel C Adams, Allen Shuster and their co-conspirators within
2 the cited corporations knew of the wrongs conspired to be done and possessed the power to prevent or
3 aid in the prevention of said wrongs. However, in being complicit in the master scheme described
4 herein, these Defendants consciously and willfully refused to do so to the detriment of Plaintiff's
5 family and children, as well as his civil rights and property interests.

6 167. Defendants share liability as the claim arises out of a common nucleus of operative facts
7 within the nexus of the master scheme described herein.

8 168. Plaintiff seeks nominal damages of \$1.00.

9 **FOURTH CLAIM FOR RELIEF**

10 **Violations of California Civil Code § 52.1 (The Bane Act)**

11 **(Against Defendants Don A Adams; Joel C Adams; Allen Shuster; Christian Congregation of**
12 **Jehovah's Witnesses, Inc.; Kingdom Support Services, Inc.; Regional Building Committee of**
13 **Jehovah's Witness, Inc.; Religious Order of Jehovah's Witnesses, Inc.; Watchtower Bible and**
14 **Tract Society of Pennsylvania, Inc.; English Congregation of Jehovah's Witnesses, Menlo Park,**
15 **California, Inc.)**

16 169. Plaintiff realleges and incorporates herein by references each and every foregoing
17 paragraph of this Complaint as if set forth in full.

18 170. At all material times, the association-in-fact RICO Enterprise, including its ringleaders
19 and agents, has engaged in a general course of action and campaign intended to cover-up its pattern of
20 racketeering activity which threatens to continue. In doing so, the Defendants have intentionally
21 interfered with and attempted to interfere with Plaintiff's civil rights including his Fourteenth
22 Amendment rights as well as his First Amendment right to petition by threats, intimidation and
23 coercion. At all material times, Plaintiff reasonably believed that if he exercised his right to petition,
24 Defendants would retaliate against him and Defendants did in fact retaliate against him by any and all
25 means described herein including defamation, harassment, wrongful conviction and other forms of
26 oppression to the detriment of Plaintiff's civil rights, property interests and well-being

27 171. Defendants share liability as the claim arises out of a common nucleus of operative facts
28 within the nexus of the master scheme described herein.

172. Plaintiff seeks nominal damages of \$1.00.

1
2
3 **FIFTH CLAIM FOR RELIEF**

4 **Violations of California Civil Code §§ 2338 and 3294 – Count 1**

5 **(Against Defendants Don A Adams; Joel C Adams; Allen Shuster; Christian Congregation of**
6 **Jehovah’s Witnesses, Inc.; Kingdom Support Services, Inc.; Regional Building Committee of**
7 **Jehovah’s Witness, Inc.; Religious Order of Jehovah’s Witnesses, Inc.; Watchtower Bible and**
8 **Tract Society of Pennsylvania, Inc.; English Congregation of Jehovah’s Witnesses, Menlo Park,**
9 **California, Inc.)**

10 173. Plaintiff realleges and incorporates herein by reference each and every foregoing
11 paragraph of this Complaint as if set forth in full.

12 174. The Defendants occupy positions of oversight, trust and confidence in relation to
13 organization members that imposes on them a duty to act with proper care and regard for the interests
14 of others. The above acts and/or omissions by the Defendants constitute a breach of that trust as owed
15 to Plaintiff, his family and all organization members alike as well as the trust placed in the Defendants
16 by the Governing Body of Jehovah’s Witnesses.

17 175. Defendants Don A Adams, Joel C Adams, Allen Shuster and their co-conspirators within
18 the cited corporations knew of the wrongs conspired to be done and possessed the power to prevent or
19 aid in the prevention of said wrongs. However, in being complicit in the master scheme described
20 herein, these Defendants consciously and willfully refused to do so.

21 176. Defendants share liability as the claim arises out of a common nucleus of operative facts
22 within the nexus of the master scheme described herein.

23 177. Plaintiff seeks nominal damages of \$1.00.

24 **Violations of California Civil Code §§ 2338 and 3294 – Count 2**

25 **(Against Defendant The City of Menlo Park)**

26 178. Plaintiff realleges and incorporates herein by references each and every foregoing
27 paragraph of this Complaint as if set forth in full.

28 179. Defendant has incurred vicarious liability pursuant to the doctrine of *Respondeat Superior* by virtue of the misconduct of agents Jeff Keegan, William Anthony Dixon and Victoria Trask who each violated Plaintiff’s civil rights.

180. Plaintiff seeks damages of \$2,000,000.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Violations of California Civil Code §§ 2338 and 3294 – Count 3

(Against Defendant The County of San Mateo)

181. Plaintiff realleges and incorporates herein by references each and every foregoing paragraph of this Complaint as if set forth in full.

182. Defendant has incurred vicarious liability pursuant to the doctrine of *Respondeat Superior* by virtue of the cited misconduct of its agents within The Office of the District Attorney for San Mateo County including DOEs 1 - 2 who received the case details from Defendant Trask then initiated a prosecutorial action in retaliation against Plaintiff thus violating his Fourteenth Amendment rights.

183. Plaintiff seeks damages of 2,000,000.

Violations of California Civil Code §§ 2338 and 3294 – Count 4

(Against Defendant The County of Santa Clara)

184. Plaintiff realleges and incorporates herein by references each and every foregoing paragraph of this Complaint as if set forth in full.

185. Defendant has incurred vicarious liability pursuant to the doctrine of *Respondeat Superior* by virtue of the misconduct of agents Daniel Kassabian, DOEs 2 -3, The Office of the District Attorney for Santa Clara County and the Sheriff’s Department for Santa Clara County.

186. Plaintiff seeks damages of 7,000,000.

SIXTH CLAIM FOR RELIEF

Violations of RICO, 18 U.S.C. § 1962(c)

(Against All RICO Defendants)

187. Plaintiff realleges and incorporate herein by references each and every foregoing paragraph of this Complaint as if set forth in full.

188. The RICO Defendants and their co-conspirators constitute an association-in-fact enterprise within the meaning of 18 U.S.C. §§ 1961(4) and 1962(c). Each of the RICO Defendants participates in the operation or management of the Enterprise.

189. At all material times, the Enterprise was engaged in, and its activities affected interstate commerce within the meaning of 18 U.S.C. § 1961(5) and in violation of 18 U.S.C. § 1962(c), to wit:

Obstruction of Justice (Omnibus Clause), 18 U.S.C. § 1503 – Count 1

1 190. The RICO Defendants falsely accused Plaintiff of battery on 9/15/2012 in furtherance of
2 the Enterprise' standing defamation campaign against him and in retaliation for his filing of federal
3 civil action C 12-01372-JSW. By fraudulently entangling Plaintiff in a criminal proceeding, the RICO
4 Defendants specifically sought to divert Plaintiff's attention, resources and time away from
5 prosecuting pending federal civil action C 12-01372-JSW.

6 191. In filing a false report with the police specifically to have Plaintiff charged and arrested,
7 as directed by the Enterprise ringleaders, the RICO Defendants endeavored to and succeeded in
8 corruptly influencing, obstructing and impeding the due administration of justice.

9 192. The RICO Defendants share liability as this claim arises out of a common nucleus of
10 operative facts within the nexus of the master scheme described herein.

11 193. The commission of this predicate RICO act caused Plaintiff to incur actual damages in
12 the form of legal fees (\$7000), bail fees(\$2600), court ordered restitution fees (\$500), probation fees
13 (\$2400) and class fees (\$1700) thus being injured in his "business or property" within the meaning of
14 18 U.S.C. § 1964(c). Therefore, Plaintiff seeks treble damages including the cost of the suit as
15 afforded by law.

16 **Obstruction of Justice (Omnibus Clause), 18 U.S.C. § 1503 – Count 2**

17 194. Plaintiff realleges and incorporate herein by references each and every foregoing
18 paragraph of this Complaint as if set forth in full.

19 195. The RICO Defendants willfully tampered with evidence in the midst of a criminal
20 investigation then, with full knowledge of the pending judicial proceeding, employed subterfuge to
21 prevent disclosure of such during discovery. Thereafter, Defendants succeeded in having the falsified
22 photographs admitted into evidence specifically to support the planned perjurous testimony presented
23 against Plaintiff during the trial. In doing so, the RICO Defendants endeavored to and succeeded in
24 corruptly influencing, obstructing and impeding the due administration of justice as this evidence
25 directly contributed to Plaintiff's conviction per the Enterprise' scheme.

26 196. The RICO Defendants share liability as this claim arises out of a common nucleus of
27 operative facts within the nexus of the master scheme described herein.

28 197. The commission of this predicate RICO act caused Plaintiff to incur actual damages in
the form of legal fees (\$7000), bail fees(\$2600), court ordered restitution fees (\$500), probation fees

1 (\$2400) and class fees (\$1700) thus being injured in his “business or property” within the meaning of
2 18 U.S.C. § 1964(c). Therefore, Plaintiff seeks treble damages including the cost of the suit as
3 afforded by law.

4 **Tampering with a Witness, 18 U.S.C. § 1512(b) – Count 1**

5 198. Plaintiff realleges and incorporates herein by references each and every foregoing
6 paragraph of this Complaint as if set forth in full.

7 199. On 9/15/2012, the Enterprise, through agents Jennifer Altamirano and Bill Douglas,
8 knowingly and corruptly used intimidation to persuade Mr. Samuel Forks, amongst others in
9 attendance, to obstruct justice by telling the police that he did not see the alleged act of battery, when
10 in fact he did see what actually took place and thus had the basis to confirm Plaintiff’s innocence.

11 200. The RICO Defendants share liability as this claim arises out of a common nucleus of
12 operative facts within the nexus of the master scheme described herein.

13 201. The commission of this predicate RICO act proximately caused Plaintiff to incur actual
14 damages in the form of legal fees (\$7000), bail fees(\$2600), court ordered restitution fees (\$500),
15 probation fees (\$2400) and class fees (\$1700) thus being injured in his “business or property” within
16 the meaning of 18 U.S.C. § 1964(c). Therefore, Plaintiff seeks treble damages including the cost of
17 the suit as afforded by law.

18 **Tampering with a Witness, 18 U.S.C. § 1512(b) – Count 2**

19 202. Plaintiff realleges and incorporates herein by references each and every foregoing
20 paragraph of this Complaint as if set forth in full.

21 203. On the evening of 9/20/2012, the Enterprise, through agents Jennifer Altamirano and Bill
22 Douglas, knowingly and corruptly used intimidation to persuade Mr. Samuel Forks to obstruct justice
23 by staying silent regarding the scheme to falsely accuse Plaintiff of battery and by refraining from
24 attending any hearings and providing true testimony regarding the actual events of 9/15/2012. In
25 being intimidated and threatened, Mr. Forks incorrectly stated that he did not see anything and had no
26 basis to refute the allegations against Plaintiff when deposed in October 2012. Thereafter Mr. Forks
27 did not attend the domestic violence hearing held in the Superior Court of California for San Mateo
28 County on 11/28/2012. When he later disclosed the effort to intimidate him and confirmed that
Plaintiff was innocent of the battery charges of 9/15/2012 during the trial for criminal case B1262610,

1 the fact that he had previously lied under duress was used to impeach his testimony. Consequently the
2 RICO Defendants' threats against Mr. Forks influenced the outcome of the hearing on 11/28/2012 and
3 the criminal trial the week of 7/14/2013 to Plaintiff's detriment and injury.

4 204. The RICO Defendants share liability as this claim arises out of a common nucleus of
5 operative facts within the nexus of the master scheme described herein.

6 205. The commission of this predicate RICO act proximately caused Plaintiff to incur actual
7 damages in the form of legal fees (\$7000), bail fees(\$2600), court ordered restitution fees (\$500),
8 probation fees (\$2400) and class fees (\$1700) thus being injured in his "business or property" within
9 the meaning of 18 U.S.C. § 1964(c). Therefore, Plaintiff seeks treble damages including the cost of
10 the suit as afforded by law.

11 **Tampering with a Witness, 18 U.S.C. § 1512(b) – Count 3**

12 206. Plaintiff realleges and incorporates herein by references each and every foregoing
13 paragraph of this Complaint as if set forth in full.

14 207. In and around the first week in October 2012, Enterprise agent Ernest Brede contacted
15 Ms. Edna Johnson by phone and knowingly and corruptly attempted to persuade her to obstruct
16 justice by participating in the scheme to falsely indict Plaintiff of battery by aligning her pending
17 deposition testimony with the false allegations and planned perjurous testimony of Jennifer
18 Altamirano, Bill Douglas and Gladys Hernandez. When Ms. Johnson refused to do so, she was
19 targeted by Ernest Brede and other agents for harassment forcing her departure from the Menlo Park
20 Congregation of Jehovah's Witnesses.

21 208. The RICO Defendants share liability as this claim arises out of a common nucleus of
22 operative facts within the nexus of the master scheme described herein.

23 209. The commission of this predicate RICO act proximately caused Plaintiff to incur actual
24 damages in the form of legal fees (\$7000), bail fees(\$2600), court ordered restitution fees (\$500),
25 probation fees (\$2400) and class fees (\$1700) thus being injured in his "business or property" within
26 the meaning of 18 U.S.C. § 1964(c). Therefore, Plaintiff seeks treble damages including the cost of
27 the suit as afforded by law.

28 **Tampering with a Witness, 18 U.S.C. § 1512(b) – Counts 4, 5 and 6**

210. Plaintiff realleges and incorporate herein by references each and every foregoing

1 paragraph of this Complaint as if set forth in full.

2 211. The Enterprise, through agents including Ernest Brede, knowingly and corruptly
3 persuaded Jennifer Altamirano, Bill Douglas and Gladys Hernandez, amongst others, to obstruct
4 justice by participating in the scheme to falsely accuse Plaintiff of battery on 9/15/2012 with intent to
5 have Plaintiff charged and arrested. These same witnesses were then influenced to participate in the
6 evidence tampering scheme specifically supporting such through collusion with District Attorney
7 Deputy DA Daniel Kassabian to the end of presenting perjurous testimony during the trial for
8 criminal case B1262610 the week of 7/14/2013.

9 212. The RICO Defendants share liability as this claim arises out of a common nucleus of
10 operative facts within the nexus of the master scheme described herein.

11 213. The commission of this predicate RICO act proximately caused Plaintiff to incur actual
12 damages in the form of legal fees (\$7000), bail fees(\$2600), court ordered restitution fees (\$500),
13 probation fees (\$2400) and class fees (\$1700) thus being injured in his "business or property" within
14 the meaning of 18 U.S.C. § 1964(c). Therefore, Plaintiff seeks treble damages including the cost of
15 the suit as afforded by law.

16 **SEVENTH CLAIM FOR RELIEF**

17 **Conspiracy to Violate RICO, 18 U.S.C. § 1962(d)**

18 **(Against All RICO Defendants)**

19 214. Plaintiff realleges and incorporates herein by references each and every foregoing
20 paragraph of this Complaint as if set forth in full.

21 215. The RICO Defendants have unlawfully, knowingly and willfully combined, conspired,
22 confederated and agreed together and with others to violate 18 U.S.C. § 1962(c), as described above,
23 in violation of 18 U.S.C. § 1962(d).

24 216. The association-in-fact RICO Enterprise described herein exploits and leverages the
25 organizational structure and protocols used by the religious organization known as Jehovah's
26 Witnesses. In doing so, the RICO Enterprise has an innate structure, framework and chain of
27 command which inherently facilitate communications and directives within its operations.
28 Consequently, Enterprise members are organized and controlled and their affairs are so conducted that
they are in fact mere instrumentalities and adjuncts for each other and thus liable for each other's acts.

1 217. The RICO Defendants knew that they were engaged in a conspiracy to commit the
2 predicate acts, and they knew that the predicate acts were part of such racketeering activity, and the
3 participation and agreement of each of them was necessary to allow the commission of this pattern of
4 racketeering activity. This conduct constitutes a conspiracy to violate 18 U.S.C. § 1962(c), in
5 violation of 18 U.S.C. § 1962(d).

6 218. The RICO Defendants agreed to conduct or participate, directly or indirectly, in the
7 conduct, management, or operation of the Enterprise's affairs through a pattern of racketeering
8 activity in violation of 18 U.S.C. § 1962(c).

9 219. Each RICO Defendant knew about and agreed to facilitate the Enterprise' scheme to
10 defraud and oppress Plaintiff. It was part of the conspiracy that the RICO Defendants and their co-
11 conspirators would commit a pattern of racketeering activity in the conduct of the affairs of the
12 Enterprise, including the acts of racketeering set forth above.

13 220. Pursuant to 18 U.S.C. § 1964(c), Plaintiff is entitled to recover treble damages plus costs

14 **EIGHTH CLAIM FOR RELIEF**

15 **Civil Conspiracy**

16 **(Against All Defendants)**

17 221. Plaintiff realleges and incorporates herein by references each and every foregoing
18 paragraph of this Complaint as if set forth in full.

19 222. Having alleged a range of predicate torts and offenses by the Defendants, Plaintiff hereby
20 states a claim for civil conspiracy.

21 223. The nucleus of the association-in-fact RICO Enterprise identified herein is comprised of
22 the Enterprise ringleaders and the legitimate endeavor non-profit corporations that they have
23 corruptively influenced through their scheme as well as any and all suitors that have been courted and
24 used by the Enterprise in its continuing pattern of racketeering activity. Each named Defendant has
25 directly or indirectly manifested as an actor within the nexus of the scheme and is thus liable for
26 damages.

27 **PRAYER FOR RELIEF**

28 WHEREFORE PREMISES CONSIDERED, Plaintiff prays for judgment as set forth below.

1. Plaintiff demands any and all general damages to which he may be entitled as afforded by

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

both state and federal law.

2. Plaintiff demands treble damages from the RICO Defendants pursuant to the provisions of 18 U.S.C. § 1964(c).

3. Plaintiff demands punitive damages as stated within each claim.

4. Plaintiff demands that any and all evidence of wrongdoing on the part of any officer or agent of a law enforcement entity, whether in San Mateo County or Santa Clara County, be remanded to the appropriate authority for further investigation and prosecution as called for.

5. Plaintiff demands that all "Watchtower" corporations named within this action initiate internal investigations per organizational protocol regarding the claims presented herein and provide proof that the Governing Body of Jehovah's Witnesses have been fully advised of these matters so that they can then have the basis to take any action that they deem necessary.

DEMAND FOR JURY TRIAL

Plaintiff Jason Cobb hereby demands a jury trial of all issues in this action triable as of a right by a jury.

Dated: October 22, 2013



Jason Cobb, Plaintiff

EXHIBIT 1

**Christian Congregation
of Jehovah's Witnesses**

2821 Route 22, Paterson, NY 12563-2257 Phone: (845) 306-1100

SDG:SSX October 20, 2009

**BODY OF ELDERS
ENGLISH CONGREGATION OF
JEHOVAH'S WITNESSES, MENLO PARK, CA
C/O JASON E COBB
531 SANDLEWOOD ST
MENLO PARK CA 94025-1374**

Dear Brothers:

Your September 24, 2009, letter has been received. You are writing to express concerns you have with your circuit overseer, Brother Paul Koehler. This is to inform you that we will look into this matter.

United with you in fulfilling our resolve to continue bearing thorough witness to the good news.—Acts 20:24.

Your brothers,

*Christian Congregation
of Jehovah's Witnesses*

cc: Charles Valorz, D-26

June 7, 2010

Summary:

- September, 24, 2009 –

Our body sent a letter of concern to the branch regarding our circuit overseer. We received a brief acknowledgement letter dated 10-20-09 but never received any other response to the issues thereafter.

- January 18, 2010 –

We received a letter from the branch directing us to send an S-21 card that had been requested by another congregation.

- February 3, 2010 –

Our body sent a response to the branch's 1-18-10 letter requesting further direction in view of the sister's circumstances (we never received a response).

- February 27, 2010 –

During the visit of our C.O. and the substitute D.O., our body is advised that a recommendation for our deletion will be submitted solely due to our failure to send the S-21 card when directed.

- March 4, 2010 –

The S-21 card in question is sent to the requesting congregation; branch is advised of such (we never received a response).

- May 24, 2010 –

Letter is received advising our body of its deletion.


Arlen St. Clair


George T. Stock


Jonathan D. Cobb

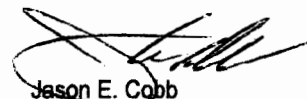

Jason E. Cobb

EXHIBIT 2

Wells Fargo Advantage[®] Checking



Account number: 87894705 October 21, 2010 - November 18, 2010 Page 1 of 3

M P JEHOVAS WITNESS K H O F
GLENN MICHELE WATSON
811 BAY RD
MENLO PARK CA 94025-1609

Questions?

Available by phone 24 hours a day, 7 days a week:
1-800-TO-WELLS (1-800-869-3557)
TTY: 1-800-877-4833
En español: 1-877-727-2932 TTY: 1-888-355-6052
華語 1-800-288-2288 (8 am to 7 pm PT, M-F)

Online: wellsfargo.com

Write: Wells Fargo Bank, N.A. (114)
P.O. Box 6995
Portland, OR 97228-6995

You and Wells Fargo

Sign up for free* Account Alerts. Get timely notifications sent right to your email or wireless device when: your balance is above or below a specified amount; a withdrawal or deposit posts to your account; your daily ATM withdrawals and debit card purchases exceed an amount you choose. Sign up or log on to Online Banking and click the Account Services tab, Messages & Alerts section to get started.

*Your mobile carrier's text messaging and Web access charges may apply.

Account options

A check mark in the box indicates you have these convenient services with your account. Go to wellsfargo.com or call the number above if you have questions or if you would like to add new services.

- | | | | |
|--------------------|--------------------------|-----------------------|--------------------------|
| Online Banking | <input type="checkbox"/> | Direct Deposit | <input type="checkbox"/> |
| Online Bill Pay | <input type="checkbox"/> | Overdraft Protection | <input type="checkbox"/> |
| Online Statements | <input type="checkbox"/> | Rewards Program | <input type="checkbox"/> |
| Mobile Banking | <input type="checkbox"/> | Auto Transfer/Payment | <input type="checkbox"/> |
| My Spending Report | <input type="checkbox"/> | | |

With you when you want a spending plan you can stick to



We can help you stay on top of your holiday spending with our checking packages that come with free online tools to help you monitor your purchases. These packages also offer account alerts that send balance* updates to your mobile phone. For more information, talk to us today, call 1-800-WFB-OPEN or visit wellsfargo.com.

*The balance update may not reflect all of your transactions, such as checks you have written or debit card transactions that have been approved but not yet submitted for payment by the merchant.

Activity summary

Beginning balance on 10/21	\$8,437.65
Deposits/Additions	0.33
Withdrawals/Subtractions	- 0.00
Ending balance on 11/18	\$8,437.98

Account number: 87894705

M P JEHOVAS WITNESS K H O F
GLENN MICHELE WATSON

California account terms and conditions apply

For Direct Deposit and Automatic Payments use
Routing Number (RTN): 121042882

Wells Fargo Advantage[®] Checking

Account number: 87894705 November 19, 2010 - December 17, 2010

Page 1 of 4



M P JEHOVAS WITNESS K H O F
GLENN MICHELE WATSON
811 BAY RD
MENLO PARK CA 94025-1609

Questions?

Available by phone 24 hours a day, 7 days a week:

1-800-TO-WELLS (1-800-869-3557)

TTY: 1-800-877-4833

En español: 1-877-727-2932 TTY: 1-888-355-6052

華語 1-800-288-2288 (8 am to 7 pm PT, M-F)

Online: wellsfargo.com

Write: Wells Fargo Bank, N.A. (114)
P.O. Box 6995
Portland, OR 97226-6995

You and Wells Fargo

Save time and money with tools to help manage your account. With Wells Fargo Online, you can stay on top of your balance* with alerts sent to your email or mobile device**, transfer funds and pay bills. To learn more, visit a banker or wellsfargo.com/wfonline.

*This balance may not reflect all transactions, such as checks written or debit card transactions approved but not submitted for payment by the merchant.

**Your mobile carrier's text messaging and Web access charges may apply.

Account options

A check mark in the box indicates you have these convenient services with your account. Go to wellsfargo.com or call the number above if you have questions or if you would like to add new services.

- | | | | |
|--------------------|--------------------------|-----------------------|--------------------------|
| Online Banking | <input type="checkbox"/> | Direct Deposit | <input type="checkbox"/> |
| Online Bill Pay | <input type="checkbox"/> | Overdraft Protection | <input type="checkbox"/> |
| Online Statements | <input type="checkbox"/> | Rewards Program | <input type="checkbox"/> |
| Mobile Banking | <input type="checkbox"/> | Auto Transfer/Payment | <input type="checkbox"/> |
| My Spending Report | <input type="checkbox"/> | | |

Activity summary

Beginning balance on 11/19	\$8,437.98
Deposits/Additions	0.34
Withdrawals/Subtractions	- 0.00
Ending balance on 12/17	\$8,438.32

Account number: 87894705

M P JEHOVAS WITNESS K H O F
GLENN MICHELE WATSON

California account terms and conditions apply

For Direct Deposit and Automatic Payments use
Routing Number (RTN): 121042882

Overdraft Protection

This account is not currently covered by Overdraft Protection. If you would like more information regarding Overdraft Protection and eligibility requirements please call the number listed at the top of your statement or visit your Wells Fargo branch.

Advantage Business Package Checking

Account number: 1940935883 November 1, 2010 - November 30, 2010 Page 1 of 3



M P JEHOVAS WITNESS K H O F
811 BAY RD
MENLO PARK CA 94025-1609

Questions?

Available by phone 24 hours a day, 7 days a week

1-800-CALL-WELLS (1-800-225-5935)

TTY: 1-800-877-4833

En español: 1-877-337-7454

Online: wellsfargo.com/biz

Write: Wells Fargo Bank, N.A. (114)

P.O. Box 6995

Portland, OR 97228-6995

Your Business and Wells Fargo

Wells Fargo offers business owners a full-service payroll solution with payroll processing, reporting, and tax services. That means you can spend less time working in your business and more time growing your business. And now, enjoy the convenience of processing your payroll online. Online payroll from the online banking leader. For more information, visit wellsfargo.com/biz/payroll or call us at 1-800-421-4714.

Account options

A check mark in the box indicates you have these convenient services with your account. Go to wellsfargo.com/biz or call the number above if you have questions or if you would like to add new services.

- Business Online Banking
- Rewards for Business Check Card
- Online Statements
- Business Bill Pay
- Business Spending Report
- Overdraft Protection

Activity summary

Beginning balance on 11/1	\$10,280.68
Deposits/Credits	2,000.00
Withdrawals/Debits	- 995.02
Ending balance on 11/30	\$11,285.66
 Average ledger balance this period	 \$10,338.22

Account number: 1940935883

M P JEHOVAS WITNESS K H O F

California account terms and conditions apply

For Direct Deposit and Automatic Payments use

Routing Number (RTN): 121042882

For Wire Transfers use

Routing Number (RTN): 121000248

Overdraft Protection

Your account is linked to the following for Overdraft Protection:

Savings - 000009841455224

Transaction history

Date	Check Number	Description	Deposits/ Credits	Withdrawals/ Debits	Ending daily balance
11/1	1010	Check		81.89	10,198.79
11/10		Recurring Transfer Ref #Opebypsd2K to Business High Yield Savings 000005224		100.00	10,098.79



Business High Yield Savings

Account number: 9841455224

November 1, 2010 - November 30, 2010

Page 1 of 3

M P JEHOVAS WITNESS K H O F
 811 BAY RD
 MENLO PARK CA 94025-1609

Questions?

Available by phone 24 hours a day, 7 days a week
1-800-CALL-WELLS (1-800-225-5935)

TTY: 1-800-877-4833

En español: 1-877-337-7454

Online: wellsfargo.com/biz

Write: Wells Fargo Bank, N.A. (114)
 P.O. Box 6995
 Portland, OR 97228-6995

Your Business and Wells Fargo

Wells Fargo offers business owners a full-service payroll solution with payroll processing, reporting, and tax services. That means you can spend less time working in your business and more time growing your business. And now, enjoy the convenience of processing your payroll online. Online payroll from the online banking leader. For more information, visit wellsfargo.com/biz/payroll or call us at 1-800-421-4714.

Activity summary

Beginning balance on 11/1	\$340.06
Deposits/Credits	100.04
Withdrawals/Debits	- 20.00
Ending balance on 11/30	\$420.10
Average ledger balance this period	\$410.06

Account number: 9841455224

M P JEHOVAS WITNESS K H O F

California account terms and conditions apply

For Direct Deposit and Automatic Payments use
 Routing Number (RTN): 121042882

For Wire Transfers use
 Routing Number (RTN): 121000248

Interest summary

Interest paid this statement	\$0.04
Average collected balance	\$410.06
Annual percentage yield earned	0.12%
Interest earned this statement period	\$0.04
Interest paid this year	\$0.10

EXHIBIT 3

MENLO PARK PD CASE 11-973

Overt Acts

CA Penal Code 148.5 - False report of criminal offense (substantive crime; overt act)

CA Penal Code 186.10 – Money Laundering

CA Penal Code 484 – False financial report to shareholders intended to induce contributions (also in violation of CA Corp. Code 6812, 6813); theft by false or fraudulent pretense; theft by trick or device; larceny by trick

CA Penal Code 503 – Embezzlement

CA Penal Code 530.5 – Business Identity Theft

CA Penal Code 532(a) – False financial statement

Criminal Conspiracy

CA Penal Code 182(a)(1) – If two or more persons conspire to: commit any crime (e.g.: CA Penal Code 148.5)

CA Penal Code 182(a)(2) – If two or more persons conspire to: Falsely and maliciously to indict another for any crime, or to procure another to be charged or arrested for any crime (criminal conspiracy)

CA Penal Code 182(a)(4) – If two or more persons conspire to: To cheat and defraud any person of any property, by any means which are in themselves criminal, or to obtain money or property by false pretenses or by false promises...(e.g.: 6812, 6813)

CA Penal Code 182(a)(5) – If two or more persons conspire to: To commit any act injurious to the public health, to public morals, or to pervert justice, or the due administration of the laws (U.S.C. 18 section 1503)

Criminal Infractions: CA Corporations Code

1100. Any two or more corporations may be merged into one of those corporations. A corporation may merge with one or more domestic corporations (Section 167), foreign corporations (Section 171), or other business entities (Section 174.5) pursuant to this chapter. Mergers in which a foreign corporation but no other business entity is a constituent party are governed by Section 1108, and mergers in which another business entity is a constituent party are governed by Section 1113.

1102. Each corporation shall sign the agreement by its chairman of the board, president or a vice president and secretary or an assistant secretary acting on behalf of their respective corporations.

6812. (a) Every director or officer of any corporation is **guilty of a crime** if such director or officer knowingly concurs in making or publishing, either generally or privately, to members or other persons (1) **any materially false report or statement as to the financial condition of the corporation**, or (2) any willfully or fraudulently exaggerated report, account or statement of operations or financial condition, **intended to induce and having a tendency to induce, contributions or donations to the corporation by members or other persons.**

- In Nov 2010, Defendant **Ernest Brede** announced to Menlo Park congregation members and shareholders that the funds on-hand totaled \$3500.00 which was not true at that time or now.

6813. (a) Every director, officer or agent of any corporation, who knowingly receives or acquires possession of any property of the corporation, otherwise than in payment of a just demand, and, with intent to defraud, omits to make, or to cause or direct to be made, a full and true entry thereof in the books or accounts of the corporation is **guilty of a crime.**

(b) Every director, officer, agent or member of any corporation who, with intent to defraud, destroys, alters, mutilates or falsifies any of the books, papers, writings or securities belonging to the corporation or makes or concurs in omitting to make any material entry in any book of accounts or other record or document kept by the corporation is **guilty of a crime.**

(c) **Each crime specified in this section is punishable by imprisonment in state prison, or by imprisonment in a county jail for not exceeding one year, or a fine not exceeding one thousand dollars (\$1,000), or by both such fine and imprisonment.**

9690. The provisions of Chapter 18 (commencing with Section 6810) of Part 2 apply to religious corporations. In so providing, the Legislature encourages the **criminal courts** of this state in sentencing persons convicted of fraudulent activities in the guise of religious activity to exercise their authority to impose restitution as a means of compensating the victims.

EXHIBIT 4

11-913

RICHARD CLINE
MAYOR

KIRSTEN KEITH
MAYOR PRO TEM

ANDREW COHEN
COUNCIL MEMBER

KELLY FERGIJSSON
COUNCIL MEMBER

PETER OHTAKI
COUNCIL MEMBER



701 LAUREL STREET, MENLO PARK, CA 94025-3483
www.menlopark.org

- COPY -

Building
TEL 650.330.6704
FAX 650.327.5403

City Clerk
TEL 650.330.6620
FAX 650.328.7935

City Council
TEL 650.330.6630
FAX 650.328.7935

City Manager's Office
TEL 650.330.6610
FAX 650.328.7935

Community Services
TEL 650.330.2200
FAX 650.324.1721

Engineering
TEL 650.330.6740
FAX 650.327.5497

Environmental
TEL 650.330.6763
FAX 650.327.5497

Finance
TEL 650.330.6640
FAX 650.327.5391

Housing &
Redevelopment
TEL 650.330.6706
FAX 650.327.1759

Library
TEL 650.330.2500
FAX 650.327.7930

Maintenance
TEL 650.330.6780
FAX 650.327.1953

Personnel
TEL 650.330.6670
FAX 650.327.5382

Planning
TEL 650.330.6702
FAX 650.327.1653

Police
TEL 650.330.6300
FAX 650.327.4314

Transportation
TEL 650.330.6770
FAX 650.327.5497

July 5, 2011

Mr. Jason Cobb
1101 Menlo Oaks Drive
Menlo Park, CA 94025

Mr. Cobb:

Our department has conducted a thorough review of the documents you submitted to date in support of your report of fraud and embezzlement. We have interviewed and collected statements from several individuals connected with this matter, identified all known parties, and collected additional relevant documents within the periods we discussed. I believe we have a good understanding of the issues presented since your first report to us in April 2011.

A preliminary review of the facts by San Mateo County prosecutors has determined the current evidence received does not establish a substantiated loss to any party and is insufficient to seek court process at this time. The various forms of documents we received from all parties to date have included bank statements for one Wells Fargo bank account before and after July 2010 and activity for two other Wells Fargo accounts after July 2010. This material has been insufficient to proceed further with the investigation.

In order to proceed, we ask that you obtain and deliver three complete years of certified bank statements and checks from January, 2008 to January, 2011, for each bank account opened at any bank and used or associated with the Menlo Park Congregation of Jehovah's Witnesses, Inc. We will suspend any further investigation until all such bank documents are received by the Menlo Park Police Department.

Please feel free to contact me with any further questions you might have.

Sincerely,

Sergeant William A. Dixon
Menlo Park Police Department

EXHIBIT 5

Stephen M. Wagstaffe, District Attorney/Public Administrator



KAREN GUIDOTTI
CHIEF CRIMINAL DEPUTY

ASSISTANT DISTRICT ATTORNEYS
MORLEY PITT • ALBERT SERRATO

COUNTY OF SAN MATEO

400 COUNTY CENTER, 3RD FLOOR • REDWOOD CITY • CALIFORNIA 94063
DISTRICT ATTORNEY (650) 363-4636 • PUBLIC ADMINISTRATOR (650) 363-4475

July 27, 2011

Jason E. Cobb
1101 Menlo Oaks Drive
Menlo Park, CA 94025

Dear Mr. Cobb,

Thank you for the opportunity to review your Criminal Investigation Request Form and the additional background information you provided. The entirety of the documentation related to your Request has been reviewed by multiple experts in preparing this response.

Based on this office's detailed review of your Request Form and accompanying documents, the San Mateo County District Attorney's Office respectfully declines to undertake investigation of your allegations.

Regards,

Handwritten signature of John Warren.

John Warren, Chief Inspector
San Mateo County District Attorney's Office