

FILED
Clerk of the Superior Court
MAY 27 2016
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4 In Propria Persona

5
6 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
7 **COUNTY OF SAN DIEGO, CENTRAL DIVISION**
8

9 GEORGE SHARP,

10
11 Plaintiff,

12 v.

13
14 STOCKTIPS.COM, AMERADA
15 CORP., LALUNA SERVICES, INC.,
16 TELUPAY INTERNATIONAL,
17 INC., ECRYPT TECHNOLOGIES,
18 INC., ALKAME HOLDINGS, INC.,
19 WELL POWER, INC., TIGER OIL
20 AND ENERGY, INC., COASTAL
21 INTEGRATED SERVICES, INC.,
22 EMPIRE STOCK TRANSFER, INC.,
23 QUICKSILVER STOCK
24 TRANSFER, INC., ROBERT
BANDFIELD, AWEBER SYSTEMS,
INC. ADRIAN HERMAN
THOMAS, HAROLD GEWERTER
and DOES 8 through 500, inclusive,

25 Defendants.
26
27
28

) Case No: 37-2015-00008210-CU-NP-CTL

) (Assigned for all purposes to Hon.
Timothy Taylor)

) **FIRST AMENDED COMPLAINT FOR**
) **VIOLATIONS OF CALIFORNIA**
) **RESTRICTIONS ON UNSOLICITED**
) **COMMERCIAL E-MAIL**
) **ADVERTISERS (Cal. Bus. & Prof.**
) **Code § 17529.5)**

1 **COMES NOW PLAINTIFF AND ALLEGES AS FOLLOWS:**

2 **PLAINTIFF**

3 1. At all times mentioned herein, Plaintiff Sharp, "SHARP" was a resident
4 of San Diego County, California. SHARP has become recognized internationally
5 as a crusader against penny stock fraud and has been loudly applauded for his
6 efforts. There is no question that penny stock fraud is a scourge of society, having
7 replaced confidence games like "Three Card Monte" and Ponzi-schemes and
8 pyramid schemes as a way to relieve innocent victims most susceptible to get-rich-
9 quick schemes, such as seniors, students and single mothers, of their savings.
10 Emails which make false and deceiving claims, are just one of several methods
11 used to lure potential dupes into such schemes. To date, the Plaintiff has been
12 lauded on several reputable internet sites and has received hundreds of letters from
13 these victims, thanking him for his efforts to combat this fraud. SHARP is also
14 well known for prosecuting civil actions against penny stock frauds, designed to
15 enrich insiders, officers and financiers of small public companies through the
16 marketing and sale of artificially overpriced and often intrinsically worthless stock
17 to an unsuspecting public. SHARP has been interviewed by the press and appeared
18 on television with respect to penny stock schemes that he first exposed. Several of
19 these target companies and their management have subsequently been the subject
20 of disciplinary action by federal regulators and/or authorities including suspension
21 from trading in the public markets.

22 2. SHARP owns and at all times mentioned owned a computer with an
23 internet connection. SHARP regularly uses this computer to access his email
24 accounts. This computer is located in the State of California in the County of San
25 Diego. SHARP received all emails referenced herein through his Internet Service
26 Provider, whose equipment is located in the State of California.

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1 7. Defendant Empire Stock Transfer, Inc. ("EMPIRE") is a registrar and
2 stock transfer agent whose responsibilities include the registration of stock
3 certificate ownership; the recording of the transfer of that ownership; and,
4 maintenance of legends or restrictions on these certificates. Transfer Agents are
5 regulated by the United States Securities and Exchange Commission ("SEC") and
6 the Financial Industry Regulatory Authority ("FINRA").

7 8. Defendant Quicksilver Stock Transfer, Inc. ("QUICKSILVER") is a
8 registrar and stock transfer agent whose responsibilities include the registration of
9 stock certificate ownership; the recording of the transfer of that ownership; and,
10 maintenance of legends or restrictions on these certificates.

11 9. Defendant Robert Bandfield ("BANDFIELD") is/was a significant
12 shareholder of Defendant TIGER and several other penny stock issuers that were
13 the subject of spam email promotions. BANDFIELD is currently incarcerated in
14 Brooklyn Metropolitan Detention Center while awaiting trial on his Federal
15 indictment for Securities Fraud and other related crimes.

16 10. Defendant AWeber Systems, Inc. ("AWEBER") is a cloud based
17 email and social media marketing provider headquartered in Morrisville, North
18 Carolina. Among other services, AWEBER manages email lists for its clients and
19 disseminates customer created emails to those lists at the behest of its clients.

20 11. Defendant Adrian Herman Thomas ("THOMAS") is the publisher of
21 the newsletter "Stock Tips" and "StockTips.com", a website dedicated to the
22 promotion of intrinsically worthless penny stocks. As a tool for these promotions,
23 THOMAS disseminates thousands of emails per day during the course of a
24 promotion.

25 12. Defendant Harold Gewerter ("GEWERTER") is an attorney licensed
26 to practice law in the State of Nevada and is approved by the SEC to issue opinion
27 letters regarding the proper removal of legends and restrictions from stock
28 certificates. His clients are largely made of public companies whose shares are

1 considered to be “penny stocks” due to the low share price and market
2 capitalization. Almost all of GEWERTER’s penny stock clients have been the
3 subject of promotions intended to artificially raise the share price and trading
4 volume in order to facilitate insider divestiture of stock in what is known as a
5 “pump and dump” scheme.

6 13. Plaintiff is ignorant of the true names of defendants sued herein as
7 DOES 8 through 500, inclusive, and therefore sues these defendants by such
8 fictitious names. Plaintiff will amend this Complaint to allege their true names and
9 capacities when ascertained. Any allegation against any defendant shall apply to
10 each DOE defendant

11 14. Plaintiff is informed and believes, and on such information and belief
12 alleges, that at all times herein mentioned, each defendant was the agent of each
13 and every other defendant, and in doing the things alleged herein, was acting in the
14 course and scope of its/his agency and/or employment and was acting with the
15 consent, permission and/or authorization of each and every remaining defendant.
16 The acts and conduct of each defendant herein was ratified and approved by every
17 remaining defendant.

18 15. Plaintiff is informed and believes that the Defendants participated
19 and/or conspired in a scheme to disseminate spam emails which: (a) contained a
20 subject line that the Defendants knew would be likely to mislead a recipient, acting
21 reasonably under the circumstances, about a material fact regarding the contents or
22 subject matter of the message; (b) contained false and misleading information; (c)
23 concealed material facts; and, (d) falsified, misrepresented, or forged header
24 information. These emails were disseminated in order to encourage the Plaintiff
25 and other members of the general public to purchase the publicly traded common
26 stock of the Defendants TIGER and COASTAL in order to create an artificial and
27 inflated marketplace for these stocks and to facilitate the divestiture of their
28 holdings in these stocks. At the commencement of this conduct, some or all of the

1 Defendants owned the vast majority of these stocks and stood to benefit almost
2 exclusively from the artificial market and price increase that resulted from this
3 conduct. At the end of the email campaigns, the share prices of TIGER and
4 COASTAL degraded to a small fraction of the inflated prices which resulted from
5 the hype, thus collectively costing those who fell prey to the schemes millions of
6 dollars.

7 16. The Plaintiff alleges that the Defendants engaged in fraudulent and
8 deceptive actions by initiating (as defined by Cal. Bus. & Prof. Code § 17529.1(i))
9 the sending of no less than 48 unlawful emails promoting TIGER and 24 unlawful
10 emails promoting COASTAL because these emails (a) contained a subject line that
11 the Defendants knew would be likely to mislead a recipient, acting reasonably
12 under the circumstances, about a material fact regarding the contents or subject
13 matter of the message; (b) contained false and misleading information; (c)
14 concealed material facts; and, (d) falsified, misrepresented, or forged header
15 information. These actions were done intentionally and with the knowledge of each
16 Defendant.

17 17. Defendants in this action are advertisers because they are persons or
18 entities that advertise through the use of commercial e-mail advertisements (in this
19 case encouraging the purchase of common stock). Advertisers are liable for
20 advertising in the emails, even if the SPAMMERS are the one who actually hit the
21 send button. Pursuant to Cal. Bus. & Prof. Code § 17529(k), G);

22
23 *The true beneficiaries of spam are the advertisers who benefit from*
24 *the marketing derived from the advertisements.*

25 *There is a need to regulate the advertisers who use spam, as well as*
26 *the actual spammers, because the actual spammers can be difficult to*
27 *track down due to some return addresses that show up on the display*
28

1 24. “Sender” “when used with respect to a commercial electronic mail
2 message, means a person who initiates such a message and whose product, service,
3 or Internet website is advertised or promoted by the message.” 15 U.S.C. §
4 7702(16)(B) (2004).

5 25. “Wash trading” is the process of buying shares of a company through
6 one broker while selling shares through a different broker. Wash trading can also
7 make a stock’s volume appear to have a lot of activity resulting from the repeated
8 buying and selling done by an individual or firm when, in fact, the shares have
9 never changed owners.

10 26. “Forward split” is a corporate action in which a company increases
11 the total number of its outstanding shares.

12 27. “Reverse split” is a corporate action in which a company reduces the
13 total number of its outstanding shares.

14 28. According to the SEC, “Pump-and-dump” schemes involve the
15 touting of a company’s stock (typically small, so-called “microcap” companies)
16 through false and misleading statements to the marketplace. These false claims
17 could be made on social media such as Facebook and Twitter, as well as on
18 bulletin boards and chat rooms. Pump-and-dump schemes often occur on the
19 Internet where it is common to see messages posted that urge readers to buy a
20 stock quickly or to sell before the price goes down, or a telemarketer will call using
21 the same sort of pitch. Often the promoters will claim to have “inside” information
22 about an impending development or to use an “infallible” combination of
23 economic and stock market data to pick stocks. In reality, they may be company
24 insiders or paid promoters who stand to gain by selling their shares after the stock
25 price is “pumped” up by the buying frenzy they create. Once these fraudsters
26 “dump” their shares and stop hyping the stock, the price typically falls, and
27 investors lose their money. [“Pump and Dump Schemes”. U.S. Securities and
28 Exchange Commission. March 12, 2001.]

1 32. Certain Defendants served specific roles to carry out the conspired
2 acts. Each role was specifically carried out to fulfill the Defendants' objectives to
3 drive up the share price and trading volume of TIGER and COSTAL by enticing
4 the public with false and misleading advertisements disseminated through a spam
5 email campaign. Each role was carried out with the knowledge, intent, agreement
6 and cooperation and under the direction of each of the other Defendants and for the
7 benefit of all of the Defendants.

8 33. Among other acts, Defendants TIGER and COASTAL deliberately,
9 and for their own benefit, enabled certain beneficiaries include Defendant
10 BANDFIELD to enrich themselves through the pump and dump scheme by issuing
11 stock for little or no value received for divestment during the spam email
12 campaign. These acts were conducted in furtherance of the Defendants' objectives.

13 34. Among other acts, Defendants EMPIRE and QUICKSILVER
14 deliberately, and for their own benefit, enabled the divesture of unregistered and or
15 immature share certificates by removing legends and restrictions from these
16 certificates without complying with certain rules of the SEC and FINRA and
17 without the advice of required and valid attorney opinion letters. These acts were
18 conducted in furtherance of the Defendants' objectives.

19 35. Among other acts, Defendant GEWERTER, deliberately, and for his
20 own benefit; (a) falsely stated in opinion letters that certain sellers of TIGER stock
21 were not affiliates of TIGER; (b) falsely stated in opinion letters that certain stock
22 certificates should be freed of their legends and restrictions because these
23 certificates had matured under rules impose by the SEC; (c) enabled and effected,
24 the breakup of an individual's control position of TIGER stock into several
25 corporate entities that were controlled by that same individual, for the purpose of
26 obfuscating and denying the control position, and then; (d) falsely stated in opinion
27 letters that these same corporate entities did not represent a control position of
28 TIGER stock, in order that the seller could avoid the restrictions imposed upon

1 those in a control position and divest himself of the stock during the pump and
2 dump scheme. These acts were conducted in furtherance of the Defendants'
3 objectives.

4 36. Among other acts, Defendant THOMAS, deliberately and for his own
5 benefit, uploaded a list of email addresses to his account at Defendant AWEBER
6 without regard as to whether those email addresses had opted into his list. Under
7 the instruction of Defendants TIGER, COASTAL, GEWERTER, BANDFIELD,
8 EMPIRE and QUICKSILVER and in exchange for payment, THOMAS
9 constructed newsletters under the guise of the alter egos "Stock Tips" and "Mike
10 Statler" promoting the stocks of TIGER and COASTAL and disseminated them
11 through the AWEBER service. These acts were conducted in furtherance of the
12 Defendants' objectives.

13 37. Among other acts, Defendant AWEBER, under the direction and
14 instruction of all of the other Defendants, deliberately and for its own benefit, and
15 in exchange for payment, enabled the dissemination of the emails promoting the
16 stocks of Defendants TIGER and COASTAL, without regard as to whether the
17 recipient email addresses had opted into receiving emails from Defendant
18 THOMAS' account. These acts were conducted in furtherance of the Defendants'
19 objectives.

20
21 **DEFENDANTS' SCIENTER**

22 38. All Defendants knowingly, recklessly, or negligently conspired to
23 disseminate false and misleading emails concerning TIGER's and COSTAL's
24 business and prospective business.

25 39. All Defendants knowingly, recklessly, or negligently drafted and
26 disseminated false and misleading emails concerning TIGER's and COSTAL's
27 business and prospective business.

28 ///

1 40. All Defendants knowingly, recklessly, or negligently manipulated the
2 share price of TIGER's and COSTAL's stock through the dissemination of
3 misleading emails designed to artificially inflate the price and trading volume of
4 TIGER's and COSTAL's stock.

5 41. All Defendants knowingly, recklessly, or negligently conspired to
6 manipulate the share price of TIGER's and COSTAL's stock through the
7 dissemination of misleading emails designed to artificially inflate the price and
8 trading volume of TIGER's and COSTAL's stock.

9 42. All Defendants knowingly, recklessly, or negligently hid the true
10 identity of the senders of the emails by forging or manipulating email headers;
11 providing a false return email address; and, by providing a false postal address.

12 43. All Defendants knowingly, recklessly, or negligently conspired to
13 hide the true identity of the senders of the emails by forging or manipulating email
14 headers; providing a false return email address; and, by providing a false postal
15 address.

16 44. All Defendants knowingly, recklessly, or negligently conspired to
17 disseminate false and misleading emails to recipients who had not opted into
18 receiving these emails.

19 45. All Defendants knowingly, recklessly, or negligently disseminated
20 false and misleading emails to recipients who had not opted into receiving these
21 emails.

22 46. Defendant GEWERTER knowingly, recklessly, or negligently
23 produced opinion letters in which he falsely denied existent affiliations of
24 individuals with the Defendant TIGER.

25 47. Defendant GEWERTER knowingly, recklessly, or negligently
26 produced opinion letters in which he made false statements to improperly procure
27 the removal of legends and restrictions from stock certificates even though they
28 had not met the threshold requirements of the SEC.

1 48. Defendant GEWERTER knowingly, recklessly, or negligently caused
2 the disbursal of shares of TIGER from a single certificate into several certificates
3 owned by several corporate entities but controlled by the same person, in order to
4 obfuscate and deny a controlling position.

5 49. Defendants EMPIRE and QUICKSILVER knowingly, recklessly, or
6 negligently enabled the improper divestiture of stock by removing legends and
7 restrictions from stock certificates without adherence to the threshold requirements
8 of the SEC and FINRA.

9 50. Defendants EMPIRE and QUICKSILVER knowingly, recklessly, or
10 negligently enabled the improper divestiture of TIGER stock by removing legends
11 and restrictions from stock certificates without adherence to the threshold
12 requirements of the SEC and FINRA.

13 51. Defendants EMPIRE and QUICKSILVER knowingly, recklessly, or
14 negligently enabled the improper divestiture of TIGER stock by failing to enforce
15 the selling restrictions on sellers holding a control position.

16
17 **THE CLAIMS AGAINST GEWERTER DO NOT TRIGGER THE**
18 **PREFILING REQUIREMENTS OF CIVIL CODE SECTION 1714.10**

19 52. Pursuant to Civil Code Section 1714.10: “(a) No cause of action
20 against an attorney for a civil conspiracy with his or her client arising from any
21 attempt to contest or compromise a claim or dispute, and which is based upon the
22 attorney’s representation of the client, shall be included in a complaint or other
23 pleading unless the court enters an order allowing the pleading that includes the
24 claim for civil conspiracy to be filed after the court determines that the party
25 seeking to file the pleading has established that there is a reasonable probability
26 that the party will prevail in the action...”

27 53. Section 1714.10 provides the following exceptions: “(c) This section
28 shall not apply to a cause of action against an attorney for a civil conspiracy with

1 his or her client, where (1) the attorney has an independent legal duty to the
2 plaintiff, or (2) the attorney's acts go beyond the performance of a professional
3 duty to serve the client and involve a conspiracy to violate a legal duty in
4 furtherance of the attorney's financial gain.

5 54. Subsection (c)(2) enables the Plaintiff to allege the Cause of Action
6 against GEWERTER without leave of the court, because the Plaintiff does not
7 allege that GEWERTER participated vicariously in the wrongdoings of his clients,
8 arising out of his legal representation of them. Rather, in his role as an attorney
9 approved by the SEC to provide opinion letters to the commission, GEWERTER
10 directly participated in achieving the Defendants' objectives by deliberately
11 violating SEC and FINRA regulations when making false statements within his
12 opinion letters, and; fraudulently and knowingly obfuscating and denying a control
13 position in TIGER stock. As such, GEWERTER acted with malice and in
14 furtherance of his own objectives of profiting from the scheme.

15
16 **DEFENDANTS' CONDUCT IN VIOLATION OF BPC § 17529.5**

17 55. Since at least December 9, 2013, and continuing to the present,
18 Defendants have initiated the transmission of hundreds of thousands of commercial
19 email messages. From December 9, 2013 to January 3, 2014, the Plaintiff received
20 no less than 48 unsolicited emails from the Defendants soliciting the Plaintiff to
21 purchase of the common stock of Defendant TIGER. From May 31, 2015 to June
22 23, 2015, the Plaintiff received no less than 24 unsolicited emails from the
23 Defendants soliciting the Plaintiff to purchase of the common stock of Defendant
24 COASTAL. Defendants' commercial email messages advertise and encourage the
25 purchase of intrinsically worthless stocks of companies with little or no operations.
26 The commercial email messages contain false statements regarding the viability of
27 these companies.

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1 56. The messages contain false header information, contain deceptive
2 subject headings, fail to identify that they are advertisements, and/or fail to include
3 the sender's valid postal address. In addition, Defendants often continue to send
4 commercial email to recipients even after the recipients have requested not to
5 receive any future commercial email messages from Defendants.

6 57. All of the conduct set forth was intentional and done with the
7 knowledge and under the direction of each Defendant who was acting in
8 conjunction with and for the benefit of each and every other Defendant.

9
10 **Defendants Initiate Commercial Email Messages**

11 58. The primary purpose of Defendants' commercial email messages is
12 the advertisement or promotion of stock.

13 59. Defendants **initiated** the email message when they originated or
14 transmitted a message themselves or they procured the origination or transmission
15 of a message through payments or other consideration, or inducements, to their
16 agents.

17 60. Defendants **sent** the email messages when they initiated a message
18 and it is Defendants' products, services, or websites that are being advertised or
19 promoted by such message.

20 61. Defendants disseminated the email messages to hundreds of
21 thousands of recipients without regard as to whether each recipient had opted into
22 it receiving emails from the advertisers.

23
24 **Defendants Use Deceptive Subject Headings**

25 62. Defendants initiate commercial email messages that promote the
26 stocks of intrinsically worthless companies with subject headings that misrepresent
27 TIGER's and COSTAL's business or prospects for business and deceptively
28 suggest that the recipients have an opportunity to profit.

1 63. A December 27, 2013 email contained the subject heading, "Will
2 TGRO see 3.00 next week?". At the time, TIGER shares were trading at the
3 already overinflated price of \$1.19/share and there was no sound business basis for
4 the company with few assets and no revenues to be trading at \$3.00 per share. The
5 pure intent of the email was to entice the reader into believing that the intrinsically
6 worthless shares of TIGER shares could reach \$3.00 in the following week. In
7 actuality, the share price peaked at \$1.29 and shares are currently valued at less
8 than one cent. Similarly, each and every email at issue which intended to promote
9 TIGER stock, contained a subject line which was false and misleading as to the
10 potential success of TIGER, **and**, deceptive in its suggestion that recipients making
11 an investment in TIGER were shrewd and sure to profit.

12 64. A June 12, 2015 email promoting shares of COASTAL contained a
13 subject heading "COLV Chart Technicals Are Screaming". The body of the email
14 provided no information to support this claim nor could they as technical analysis
15 on a manipulated stock is impossible. Similarly, each and every email at issue
16 which intended to promote COASTAL stock, contained a subject line which was
17 false and misleading as to the potential success of COASTAL, **and**, deceptive in its
18 suggestion that recipients making an investment in COASTAL were shrewd and
19 sure to profit.

20
21 **Defendants Fail to Identify Their Messages as Advertisements**

22 65. The text of numerous commercial email messages initiated by
23 Defendants that promote the intrinsically worthless shares of TIGER fails to
24 conspicuously identify the messages as advertisements or solicitations. To the
25 contrary, most if not all of these emails contain illegible disclaimers seeming to
26 state that the email is NOT a solicitation. This is a clear intent to deceive the
27 recipients as to the true nature of the emails; their true intent--to entice the reader
28

1 to acquire shares of TIGER; and to disguise these emails from the advertisements
2 that they were.

3 66. The text of numerous commercial email messages initiated by
4 Defendants that promote the intrinsically worthless shares of COSTAL fails to
5 conspicuously identify the messages as advertisements or solicitations. To the
6 contrary, most if not all of these emails contain illegible disclaimers seeming to
7 state that the email is NOT a solicitation. This is a clear intent to deceive the
8 recipients as to the true nature of the emails; their true intent--to entice the reader
9 to acquire shares of COASTAL; and to disguise these emails from the
10 advertisements that they were.

11 12 **Defendants Use False or Misleading Headers**

13 67. Commercial email messages initiated by Defendants contain header
14 information, including "from" and "reply-to" lines. The "from" line purports to
15 identify who sent the email message; the "reply-to" line identifies to whom a return
16 email message will be sent if the email recipient clicks on the "reply" button in the
17 recipient's email software.

18 68. Defendants have initiated commercial email messages that contain
19 false header information. For example, in numerous instances, Defendants have
20 initiated commercial email messages which include false information as to the
21 originating email address. In numerous instances, the email addresses listed in the
22 "from" lines or "reply-to" lines of Defendants' email messages have not been valid
23 email accounts at the time the messages were sent.

24 69. The Plaintiff attempted to reply to Defendants' commercial email
25 messages find that messages sent to the email addresses listed are rejected and
26 returned as "undeliverable."

27 ///

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1 70. The false or misleading header information has impaired the
2 Plaintiff's ability to identify, locate, or respond to the persons who initiated the
3 electronic mail messages and to investigate alleged violations.
4

5 **Defendants Fail to Confirm the Source of the Email Distribution List**

6 71. The emails were spam emails because the recipients had not opted
7 into the email distribution listed uploaded by the Defendants into AWEBER's
8 database, contrary to AWEBER's own Terms of Service that each of its clients
9 must adhere to. Defendant AWEBER enabled the uploading of the distribution list
10 without taking care to ensure that each and every recipient on that list had willingly
11 and intentionally opted into that list and as such bears the responsibility for the
12 distribution of spam.
13

14 **Defendants Fail to Include a Valid Postal Address**

15 72. In every instance, Defendants fail to provide a valid physical postal
16 address in their commercial email messages. When Defendants' commercial email
17 messages include a postal address, it is always a fake postal address. In many
18 instances, Defendants' commercial email messages include the postal address 4000
19 Aurora Avenue N., Ste. 119, Seattle Washington 98103, which is not the address
20 of any of the Defendants.
21

22 **Defendants Fail to Disclose the True Purpose of the Email Advertisement**

23 73. In every email, Defendants fail to disclose that they intend to sell
24 stock under their control at the same time they are encouraging recipients to buy
25 the stock. Pursuant to The Securities Act of 1933 Section 17 (b);

26 *It shall be unlawful for any person, by the use of any means or instruments*
27 *of transportation or communication in interstate commerce or by the use of*
28 *the mails, to publish, give publicity to, or circulate any notice, circular,*

1 Code § 17529.5(b)(1)(B)(ii), totaling \$72,000 jointly and severally against all
2 Defendants

3 (c) for cost of suit herein incurred;

4 (d) for such other and further relief as the court may deem proper.

5
6 Dated: May 16, 2016

By: George Sharp, In Propria Persona

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