3-12-16

March 12, 2016

Dear Ms Silberberg and Mr. Banks

Please find attached the following documents:

Motion to dismiss suit

Rico & Racketeering Suit

Exhibits that show the collusion & corruption:

- 1. The Forged Addendum that Divorce Lawyer Ilona Grenadier used to steal through her law firm from Sonia Grenadier et al
- 2. The Orders et al on the tampering with the Grand Jury
- 3. The suit by the City of Alexandria against me for my gutters & an RV in my driveway
- 4. The Judges lack of Jurisdiction
- 5. The Obstruction of Justice with my files in the City Court House
- 6. The illegal Jailing and Torture of me in Jail Violation my 1st, 4th,8th and 13th amendment of the United States Constitution and several in the Virginia Constitution

I believe most of this information you have received through e-mails but, I wanted to hand deliver hard copies to you for you to be able to review and understand the criminal intent of many against me.

Warmly,

Janice Wolk Grenadier

The Faces of the Murdered / Suicide and Survivor's of the Old Boys Network in Northern Virginia









The Many Victims of
Michael Gardner
The Young Girls
Molested who
Stood Up
After having a Hit Man
Hired to take them out

No Pictures of
John Doe
And
Dr. Robert Rixse
RIP
Murder for Hire

Chris Mackney *Janice Wolk Grenadier *Ruth Ann Lodato *Ron Kirby *Nancy Dunning *Megan Owen Barry

Suicide

Still Fighting & Needs HELP

Murder for Hire

Suicide

Survivors

Murder for Hire

Murder for Hire and Questionable Suicide's in the City of Alexandria and Northern Virginia

This puts together several known facts – through the life of Janice Wolk Grenadier and different News articles and book facts from "Bullied to Death" the Chris Mackney story, Edited and Published by FamilyCourt.com, INC attorney Michelle McDonald, written by: Mike Volpe. That the obvious is being covered up by the FBI, the Judiciary, the Government and Elected Officials who are using there personal "POWER and FINANCIAL POWER" to illuminate those that they find annoying or whom may get in their way through Murder for Hire or Questionable Suicides, illegal jailing that when put together it shows a pattern and practice of the "Old Boys Network" in the State of Virginia.

Pete Scamardo in 1968 hired a hit man Charles Harrelson to kill his child hood friend Sam Delegia Jr, which brings the question was the idea of how to get rid of your spouse / or other brought to the Old Boys Network in the 70's by Pete Scamardo as the hits known begain in or around 1984 with Dr. Rixsey. That by the 1990's in two Commercial / Land Development Association known Nationwide with headquarters in the City of Alexandria Pete Scamardo was President, Chairman on the boards as an active citizen – hiding his true idenity and past criminal history from the locals. This started to unravel, to be exposed through the divorce of his daughter to Chris Mackney who would take his own life in December of 2013 from the bullying of Pete Scamardo, his attorneys whom he paid handsomly and Judge Bellows who today is the Judge for Charles Severance. That Judge Bellows by all apperance in the news and record has disallowed any negative information or truth on the spouses / third parties or issues the victims may have been having with others prior to opening their front doors in the City of Alexandria and being MURDERED.

That where Janice Wolk Grenadier live's in a circle around Janice thier have been **5 known Murder type hits** – Dr. Rixsey, John Doe, Nancy Dunning (which you will read came to Janice's home twice to check on Janice, now believed Nancy knew more and was from what Nancy said afraid of what could happen and maybe knew what was going to happen to her) Ron Kirby and Ruth Ann Lodato. That all five have strong connections to the Old Boys Network.

July 1. 1984 Who shot **Dr. Robert Rixse / Murdered** for opening his front door. We know who hired the killer – the boyfriend of his x-wife. But what is the evidence of who shot him? Did the bullets that killed Dr. Rixse in 1984 match the bullets of Nancy Dunning and others? Where they tested? The story the police released was the murderer with no evidence was a man floating in the Potomac dead whom had Mafia ties. Easy for the City of Alexandria police and the FBI as they consider this murder solved.

We then have unknown date and name of John Doe Murdered for opening his front door in the City of Alexandria, also connected to the Old Boys Network and Murdered, whom has received no real press that can be found.

Then on or around **September 3rd of 1997** that on an unexpected cab ride to the airport as Janice's x-husband David Grenadier (son of the late Judge Albert Grenadier and step-son of Divorce Lawyer Ilona Ely Freedman Grenadier Heckman of Greanadier Anderson Starace Duffett and Kieser) as he was suppose to take Janice to the airport and was late, Janice was outside waiting and not in her home. Janice's x-hsuband as Janice had called him to find out where he was – started yelling at her and saying a cab was on the way. Janice can persume now his disappointment the money it appears he and Ilona spent to have Janice killed has come back to haunt them. When Janice got in the cab and the driver could hear David yelling he said to Janice hang up the phone, hang up the phone if you don't hang up the phone I will pull over and hang it up for you. Janice hung up the phone, the driver than said we can take care of that for \$5,000.00 – you don't have it – then \$2,000 we can work it out. Janice was handed a phone number, Janice tossed it in the trash can thinking it had been a set up – Janice now believes with out question it was to be a hit and today she was to be dead. Janice has never been questioned by the City of Alexandria Police or the FBI even though she has reached out several times with her information.through Commonwealth Attorney Brian Porter & Sheriiff Lawhorene (who had her tourtured in jail)That in February / March of 1998 Nancy Dunning who would open her front door in 2003 came to Janice on different occations to check on her safty. The question know arrises was she aware of the outcome that was meant for Janice in September of 1997.

November 1997 That Lawyer Ilona in collusion with David Grenadier, Andrea Grenadier, Robin Grenadier passed a rumor around that caused David Grenadier to pull a gun in the home with Janice's girls in the home.

February 2003 the Suicide of Megan Owen Barry wife of Fairfax County Sheriff Stan G. Barry – The Washington Post reported that at 12:30 am Sheriff Barry had stepped out and when he came back his wife had committed suicide. The Blue Wall calls this a Murder, but of course no investigation.

December 2003 the Murder of Nancy Dunning wife of City of Alexandria Sheriff James Dunning – never questioned "oops" say the Police when Dunning dies in South Carolina a few days after Janice Wolk Grenadier on the radio questions the investigation or

lack of investigation into the Murder.

March of 2011 – City of Alexandria police, Fire and Ambulance come to the home of Janice Wolk Grenadier while she is on travel – she is supposedly "DEAD" in the home? There is no record of this in the City of Alexandria. Two neighbors have confirmed this with Janice and the one who convinced the police to not hack down her door but to allow him to open it with the key he had. It was not till June of 2011 when Janice's neighbor shared this with her she became aware of it. When researched thier is no record yet two other neighbors have confirmed this.

December 2011 / February 2012 - Deliberate tampering with knowledgeable intend of the Grand Jury by Judge Potter and

Commonwealth Attorney Randy Sengel

October 2012 – Janice's documents submitted into the record, when she went to check that they had been filed – she is told to take them or they would throw them out, Janice refused to take them and then they are mailed back to her by Judge's Kemler, Dawkins and Clark. The box about 4" thick has been x-rayed and shows the documents but, never opened still In the box







December / January time frame of 2012 & 2013 Lawyer Ilona in collusion with others as a favor or hired a gentleman that goes by the name of Mark Stuart who informs Janice he was to drug Janice and get sexual inappropriate pictures of Janice, or to rape one of Janice's daughters, or to plant drugs on Janice's daughter or in the home to give Circuit Court Judge's Kemler, Dawkins and Clark, information to make JWG incompetent to file any other documents. Mr. Stuart said the Lawyer Ilona will go to any length to harm Janice or Janice's daughters. That Lawyer Ilona will continue to do what she can to distract Janice from becoming successful and moving on with Janice's life. That Lawyer Ilona is a "Greedy Jew" that all Lawyer Ilona's actions are deliberate to cause harm to Janice. When the Alexandria Police were called they informed Janice they were instructed by Commonwealth Attorney Randy Sengel to not take any reports of issue.

November of 2013 the Murder of Ron Kirby - Opening his front door - Shot and Murdered.

December of 2013 – Ilona Grenadier Heckman and Presidential Candidate Loretta Lax Miller do a "HATE OF CATHOLICS, CHRISTIONS et al" Blog – jwgrenadierisalair.blogspot.com taken down while Janice is in jail.

From: LeahLax1234@aol.com <LeahLax1234@aol.com>

Tue, Dec 24, 2013 at 2:05 PM

want to hear something more scarier I contacted <u>llona</u> Ely Freedman Grenadier Heckman your witch hunt is over

From: LeahLax1234@aol.com

Tue, Dec 24, 2013

YOU KNOW What YOU DIDN'T HELP JEWS YOU ARE THE KIND THAT WOULD TURN

THEM IN BECAUSE ONE PERSON DID SOMETHING TO YOU THAT WAS JEWISH, YOU MADE YOUR BED AND YOU LIED IN IT I THIS FAMILY REJECTED YOU FOR NOT BEING JEWISH, YOU STUPID GOY, YOU WERE REJECTED... GET THAT INTO YOUR THICK SKULL, NOW YOU ARE MAKING UP STORIES AND SPREADING

LIEST BLAMING ALL JEWS LIKE HITLER FOR NOT LIVING ON EASY

STREET, WELL GET OFF YOUR ASS. GOOD YOU LOST ALL YOUR MONEY MAKES YOU HUMBLE. AND GOOD YOU GOT A WHIPPING FROM A JEWISH LAWYER WHO WAS SMARTER THEN YOURS. GOOD FOR HER. I WOULD HIRE HER IN A HEART BEAT, SHE WENT AFTER A JEW HATING NAZI AND SHE WON, AND I HOPE SHE GAVE HER GRANDSON A GOOD TALKING TO FOR MARRYING A GOY IN THE FIRST PLACE AND HE SHOULD HAVE KEPT HIS ZIPPER UP AND NOT HAVE HAD SEX WITH A MENTALLY SICK PIECE OF CRAP LIKE YOU.

YOU ARE THE NAZI WORSE A MUSLIN LOVING NAZI! YOU HATE YOURSELF THAT IS WHY YOU HATE JEWS YOU ARE BLOCKED!

February 18, 2014 - FBI cautions residents of public corruption in Va. -

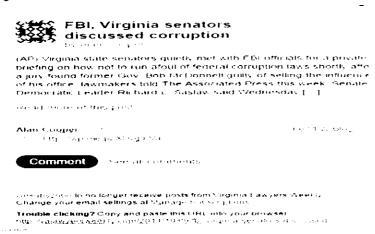
http://www.wusa9.com/story/news/local/2014/02/18/fbi-cautions-residents-of-public-corruption-in-northern-

wirqinia/5585877/ WASHINGTON (WUSA) -- The Federal Bureau of Investigation's (FBI) Washington Field Office is looking to identify any public corruption occurring in Northern Virginia. The FBI says public corruption can occur "when a public official, at any level of government local, state or federal does any official act in exchange for money, or other free goods or services, for private gain. Public corruption could also include public employees who take something of value for their own personal gain, thereby violating the public's trust." The FBI says many of their investigations into public corruption start once they receive a tip from someone. If you want to help identify potential criminal activity, the Washington Field Office has set up a Northern Virginia Public Corruption Hotline at 703-686-6225 and you can also e-mail them at NOVAPC@ic.fbi.gov.

Some of the examples of corruption include:

- Government officials such as DMV employees, city inspectors, taxing or zoning assessors or other regulatory agency employees, or even town councils or mayors;
- Contracting officials at all levels, including those who manage government contracts or regulatory permits; or, school resource officers who manage school accounts;
- Local officials colluding with real estate investors to rig the bidding process at foreclosure auctions;
- A person representing the judicial branch a judge, member of the jury or court personnel; or,
- A person representing law enforcement, who steals drugs from criminals, embezzles government funds, falsifies records or smuggles contraband

February 2014 the **Murder of Ruth Ann Lodato** for opening her front door, daughter of Judge Giammittorio & sister to Judge Bob Giammittorio



October 9, 2015 The FBI & VA Senators in private discuss Corruption in Virginia The Result to date is Two Supreme Court Justices- Chief Judge Cynthia Kinser and Justice Leroy Millette Jr. resigning, Judge Potter retiring early, Commonwealth Attorney Randy Sengel retires at a young age. The Old Boys Network retires them early with all benefits - by all appearance as a "Thank you" for hiding the Murder by Hire and Suicides

October 11, 2014 – Breaking news Senator Mark Warner and aid to Governor Terry McAuliffe guilty and admit to offering a Federal Judgeship to daughter of Phil Puckett

October 14, 2014 - Janice exposes on Blog VaLaw2010.blogspot.com information of corruption by Senator Warner

October 22, 2014 – November 12, 2014 – 22 days Janice illegally jailed and tortured in the City of Alexandria, Solitaire Confinement till 5pm on Election day Tuesday, November 4, 2014. Illegally Jailed to: 1. Silence her and stop exposure of e-mails between herself and Mark Warner's office on the corruption in the Judiciary. Janice went to Mark Warner for help instead he had her jailed, at the same time it was exposed his "Pay to Play" with a Federal Judgeship for a favor. Being ignored by the Senate Ethics Committee. 2. To Bully / scare her into either committing Suicide or to turning the other check of the corruption and not holding Virginia and the Federal Judiciary, the Government and Elected Officials accountable, as well as the criminal acts and actions of the Old Boys Network in Virginia

December 19, 2014 Letter exposed that Michael Gardner was looking for someone to hire to Murder young girls he had molested and found guilty with DNA – yet let out of jail by Chief Justice Cynthia Kinser.

December 31, 2014 Chief Justice Cynthia Kinser with no explanation to retire early (January 31, 2022 – expiration of her appointment) The Appeals Court of the State of Virginia had denied Michael Gardner's appeal / release – Cynthia Kinser let him out of jail by all appearance for the Old Boys Network, to hire a hit man to kill the young women he had molested prior to his re-trail. She will receive her pension and perks for cooperating and doing the bidding of the Old Boys Network for all her years.

January 23, 2015 - The Virginia Republican Party wants the U.S. Senate to investigate whether Democratic Sen. Mark Warner violated federal law when he discussed possible job opportunities for a former state senator's daughter. GOP Party Chairman Pat Mullins sent a letter Friday to the U.S. Senate Select Committee on Ethics asking it to investigate

Warner. He was part of a group of Democrats that tried unsuccessfully to prevent former state Sen. Phil Puckett from resigning last summer. Puckett's resignation gave Republicans control of the state Senate. Warner has acknowledged he "brainstormed" with Puckett's son about possible job opportunities for Puckett's daughter but did not make any explicit job offers. Federal prosecutors indicated in December their investigation into Puckett's resignation was closed, they would ignore the criminal actions. That Janice has followed up with a complaint to the Ethics Committee by all appearance along with the Judiciary are ignoring these facts, Murder / Suicides et al.

August 31, 2015 Janice Intervenes in the Charles Severance Case

September 2015 Judge Bellows "ORDER" Denies Janice Intervene with no hearing, and Orders Clerks to take no other filings by Janice

September 2015 Janice Intervenes in the Michael Gardner case – Michael Gardner takes a plea. The Old Boys Network cannot afford two Murder for Hire case's going at the same time. The question should be for all – What is the back room deal the Old Boys Network made with Michael Gardner for the plea and his silence.

On or around **October 3, 2015** we come full circle Charles Severance will be tried for the Murders of Nancy Dunning, Ron Kirby and Ruth Ann Lodato with a police office having told Janice they had no real evidence that supports him doing it, that the City of Alexandria was in the process of creating the needed evidence to support a conviction. That Judge Bellows who assisted Pete Scamado's Murder / Suicide of Chris Mackney will preside over the Charles Severance trial. That Judge Bellows understands and will disallow evidence that may find Charles Severance innocent is without question, he has shown this in his pre-trial Orders. That Judge Bellows brings a Bias in support of Murder / Suicide into the courtroom cannot be denied after reading "Bullied to Death". That Judge Bellows is no different than the Judge's that have ruled in Bias, Retribution, Retaliation with the knowledgeable intend to ignore the law and to protect the criminal acts of David Grenadier and Ilona Ely Grenadier Heckman are obvious in all documents and Orders filed in the courts. **That Chris Mackney, Charles Severance and Janice Wolk Grenadier and MANY OTHERS have in common is the Old Boys Network has made it there mission to kill or ruin there lives to protect one of there owns criminal actions.**

No doubt the Murderer needs to be stopped, yet the person who paid him to kill the above should be held accountable – No one will out the Murderer for hire – because for free he will take that person out. It is the belief of Janice he does not kill if he has met you – and talked to you – He kills anonymous only, because if he didn't Janice believes he would have killed her by now, but, that she has met him and he has spared her, as Mark Stuart did.

The "Old Boys Network" is an evil Gang of men and few women with no sole. They consist of the POWERFUL and WEALTHY of the Judiciary, the Government and Elected Officials in Virginia and the District of Columbia. They believe they are above the law, and the truth supposedly your best defense does not exist around them, that they are no more then a bunch of low life bully's with money, and no class. The leaders in this "Gang" are Judge Donald Haddock and Judge Donald Kent at least in the case of Janice Wolk Grenadier. In the case of Chris Mackney it was Judge Bellows, who has now overlapped into Janice's with the cover up of the hits and the trial of Charles Severance. That the following law firms have dirty hands in collusion of these actors: Grenadier Anderson Starace Duffett and Kieser, Keller Heckman, DiMuroGinsberg, Troutman Sanders aka Mays & Valentine, BWW Law Group aka Bierman Geesling Ward and Wood, Parker Simon & Kokolis LLC, and other's that are known and unknown.

<u>Virginia Rated 47th and 49th in Corruption - Daily Beast rated Virginia second most Corrupt State - http://www.loudountimes.com/index.php/news/article/region survey finds virginia second most corrupt state987/ - State Integrity Gave them an F - 47th most corrupt States - http://www.stateintegrity.org/virginia That Janice is not alone the corruption and lack of over site or Due Process in the courts in Virginia, the Federal Courts of DC and Virginia is and are a disgrace.</u>

Yet to date October 3, 2015 Janice has not been interviewed by the FBI in regard to the information in this article even with her many phone calls to them – for help to protect herself and her girls.

Update: Charles Severance was found guilty of the 3 killings with no real evidence.

Read more at: www.ProSeAmerica.blogspot.com *

@ProSeAm * JAMJustice.org the solution to the criminal acts * ProSeAmerica.net *

JAMJustice.org * www.Facebook.com/ProSeAmerica * E-mail ProSeAmerica@gmail.com

Contact Janice at: 202-368-7178

UNITED STATES DISTRICT COURT FOR THE EASTERN DIVISION OF VIRGINIA

JANICE WOLK GRENADIER

15 W. Spring Street
Alexandria, VA 22301
PRO SE Poor Person
Plaintiff,

Civil Action No VERIFIED COMPLAINT JURY TRIAL DEMAND

Vs.

UNITED STATES OF AMERICA (USA)

C/O Attorney General Loretta Lynch Department of Justice Washington, DC

COMMONWEALTH OF VIRGINIA (VA)

C/O Office of Attorney General Mark Herring 900 East Main Street Richmond, VA 23219

CITY OF ALEXANDRIA (COA)

C/O City Attorney 310 King Street Alexandria, VA 22314

GRENADIER STARCE DUFFETT & KIESER PC

649 South Washington Street

Alexandria VA 2214

DIMUROGINSBERG PC

1101 King Street Suite 600 Alexandria, VA 22314

MICHAEL WIESER ESQ

510 King Street #416 Alexandria, VA 22314

REED SMITH

RICH ROSENTHAL BRINEFIELD

MANITTA DZUBIN & KROGER LLP

210 Union Street

Alexandria, VA 22314

BWW LAW GROUP

2101 Wilson Blvd. Ste 402 Arlington VA 22201

TOURTMAN SANDERS

AKA MAYS & VALENTINE

1850 Towers Crescent Plaza Suite 500 Tysons Corner, VA 22182

PARKER, SIMON & KOKOLIS, LLC

110 N. Washington Street Suite 500 Rockville, MD 20850

KELLERHECKMAN

CASE NO.

- 1. VIOLATIONS OF THE CIVIL RIGHTS ACT OF 1871 (42 U.S.C. §§ 1983, 1985, 1986);
- 2. RACKETEERING AND CORRUPT ORGANIZATIONS ACT OF 1970 (18 U.S.C. § 1962);
- 3. FALSE ADVERTISING (15 U.S.C. § 1125):
- 3. DECLARATORY JUDGMENT (28 U.S.C. § 2201);
- 5., LIBEL AND SLANDER
- 6.. FALSE IMPRISONMENT
 DEMAND FOR JURY TRIAL

Washington, DC

VIRGINIA STATE BAR

NEIL GURVITCH ESQ / WECHELER, SELZER & GURVITCH, CHARTED

4550 Montgomery Ave Suite 900 N

Bethesda,, MD 20814

ILONA GRENADIER HECKMAN

4200 Massachusetts Ave Apt 410 Washington DC 20016-4752 igrenadier@vafamilylaw.com

DAVID MARK GRENADIER

Silver Spring, Maryland

ERIKA ELY LEWIS

Los Angeles California

JOHN DOE

JANE DOE

Defendants – AS PUBLIC SERVANTS, INDIVIDUALLY AND IN THEIR OFFICIAL CAPACITY AS AN OFFICER OF THE COURT

VERIFIED COMPLAINT/CONSPIRACY TO INTERFERE WITH CIVIL RIGHTS 18 USC 241 & 242, USC 1983 ILLEGAL ACTIONS TO DENY ACCESS TO GRAND JURY, FALSE IMPRESSEMENT, SLANDER, LIBEL, FRAUD ON THE COURT/ TREASON, VIOLATIONS OF THE CIVILRIGHTS ACT OF 1871 (42 U.S.C. §§ 1983, 1985, 1986);. RACKETEERING AND CORRUPT ORGANIZATIONS ACT OF 1970 (18 U.S.C. § 1962); FALSE ADVERTISING (15 U.S.C. §1125); DECLARATORY JUDGMENT (28 U.S.C. § 2201); MOTION FOR HARASSMENT PROTECTIVE ORDER (18 U.S.C. § 1514(b)) DEMAND FOR JURY TRIAL

Verified Complaint

COMES NOW Plaintiff Janice Wolk Grenadier (Janice) reserves the right to amend Complaint and add additional Parties per FRCP Rule 15. Plaintiff Janice Wolk Grenadier complains against the captioned Defendants as follows: to seek relief for the violation of Federal and Constitutional rights under Title 42 U.S Code §1981 &1983, Title 18 U.S. Code § 241 & 242 and under the Bill of Rights the Four Basic Freedoms are being Violated:

- 1. Freedom of speech
- 2. Freedom of worship
- 3. Freedom from want
- 4. Freedom from fear

To include the illegal imprisonment of Janice Wolk Grenadier from October 22, 2014 through November 12, 2014. Where the City of Alexandria, the State of Virginia used warfare torture to further harass and intimidate with the appearance of the hope of her committing suicide or killing her. That the obvious intentions in the Cover up of the Criminal Acts of Senator Mark Warner and Divorce Lawyer Ilona Ely Freedman Grenadier Heckman are the reasons for the imprisonment.

That since 2007 Plaintiff to her face from Judges or representatives of the Judges have said to Plaintiff "You cannot win this we LOVE Ilona", (Chief Judge Donald Haddock) (Ilona Grenadier Heckman founding partner of Grenadier, Anderson, Starace, Duffet&Keisler PC is who Judge Haddock "LOVES") "Me and My family cannot get a fair trial either, you cannot win this you are no longer one of them" (x-wife of Judge Donald Kent best friend to Judge Donald Haddock) The Dockets shows it would at times take the Judges in the City of Alexandria over 2½ months to find a Judge who would rule in favor of Ilona an attorney lying in court, lying in court documents, theft of funds through her law firm the Sonia Grenadier Trust and Plaintiff and her girls, bullying and threatening Plaintiff, involved in forgery, hate of Catholics / Christians, gang like activity mirror imaging the Klue Klux Klan, Not once has Plaintiff lost because she does not have the Law on her side, it is because of discrimination – religious / social / economic / hierarchy by the Defendants to protect one of their own.

Further Claims are outlined in this complaint.

DEMAND TRIAL BY JURY

INTRODUCTION

COMES NOW that on September 12, 2007 Ilona Grenadier Heckman a lawyer founding partner of Grenadier, Anderson, Starace, Duffett& Keiser PC, widow to Judge Albert Grenadier of the City of Alexandria and his 1st cousin Jerome Heckman, founding partner of Keller Heckman an International law firm <u>LIED IN COURT</u>. The Slippery Slope of the Judicial Misconduct, Criminal Misconduct, and Discrimination for Religious, Social, Economic and Hierarchy, the Gang type behavior similar to the Klu Klux Klan – the Collusion of the Defendants began to cover up the Lies, the attempt to harm Plaintiff and her girls American Born Citizens through drugs and rape, to Slander Plaintiff, to prevent Due Process. The purpose of the Old Boys Network and the Judiciary is to prevent one of their own Ilona Grenadier Heckman from being held accountable for:

Perjury, Obstruction of Justice, Aiding and abetting obstruction of Justice, Fraud on the Court, Involvement of Forgery, Theft of money from the Sonia Grenadier Trust account through her law office for great personal gain over \$10 Million in Real Estate, Theft of Herman Grenadier, joint and several liability, malpractice, Bribery, Abuse of her Oath of Office, Conspiracy, Collusion, Gang like activity mirror image to the Klue Klux Klan, Miscarriage of Justice, preventing Due Process, conflict of interest – related to the practice of law, violating code of ethics, has liability to her victims, has violated Plaintiffs Religious, Political, Social, United state Constitutional, Virginia Constitutional and Civil Rights, Breach of Fiduciary Duties, Violating RULES OF PROFESSIONAL CONDUCT, Title 18 US Code 241 Conspiracy against rights, and 242 Deprivation of rights under color of law, Retaliatory & Retribution actions, Treason, Title VI Civil Rights Act of 1964 Title VI, 42 U.S.C. 2000d et seq., was enacted as part of the landmark Civil Rights Act of 1964, 18 USC § 912. With her Intention to 18 USC § 1341 -Frauds and swindles, Defraud, Breach of Contract, Arbitrary and Capricious behavior, Committed Fraud on the Court, § 18.2-498.3. Misrepresentations prohibited, § 18.2-172 - Judicial Misconduct; Criminal Misconduct; Mail Fraud; Honest Serves Fraud; Extortion; Harassment; Gang activity;

Racketeering; Retaliation; Discrimination; et al. not limited to: decisions made in bad faith for a corrupt purpose, deliberately and intentionally failing to follow the law; Extrinsic fraud; Egregious legal errors; Violation of Procedural Rules; Violation of Due Process; uttering, etc., other writings et al. All of above charges will and can be proven with letters, documents, witnesses who have also been harmed by the actions of Plaintiff.

This case started out a domestic issue, TODAY THIS IS AN AMERICAN ISSUE, the right of access to the courts to a pro se litigant without having their life threatened and being Jailed by the Collusion, Racketeering of the Judicial Community. That the Judicial Community polices itself, that Plaintiff has gone through all channels for help, to be turned away. The Judicial Community has created a smoke and mirrors of Immunity that they have tried to force on the American people, to believe that they are above the law and cannot be held responsible for their actions in the court room. This is untrue. That the immunity is lost for actions that are for personnel gain, that are willful acts that are and were malicious, violent, oppressive, fraudulent, wanton and grossly reckless. That Discrimination is color blind that there is discrimination for social, economic and hierarch that exists in the Judicial Community to protect one of their own. That cases across this Great Country Judges and the Judicial Community are being held accountable for their actions as Judges going to jail for Obstruction of Justice et al.

"Pro se plaintiffs are often unfamiliar with the formalities of pleading requirements. Recognizing this, the Supreme Court has instructed the district courts to construe pro se complaints liberally and to apply a more flexible standard in determining the sufficiency of a pro se complaint than they would in reviewing a pleading submitted by counsel. See e.g., Hughes v. Rowe, 449 U.S. 5, 9-10, 101 S.Ct. 173, 175-76, 66 L.Ed.2d 163 (1980) (per curiam); Haines v. Kerner, 404 U.S. 519, 520-21, 92 S.Ct. 594, 595-96, 30 L.Ed.2d 652 (1972) (per curiam); see also Elliott v. Bronson, 872 F.2d 20, 21 (2d Cir.1989) (per curiam). In order to justify the dismissal of a pro se complaint, it must be "beyond doubt that the plaintiff can prove no set of facts in support of his claim which would entitle him to relief.' " Haines v. Kerner, 404 U.S. at 521, 92 S.Ct. at 594 (quoting Conley v. Gibson, 355 U.S. 41, 45-46, 78 S.Ct. 99, 102, 2 L.Ed.2d 80 (1957)).

I. JURISDICTION

- 1. This Court has jurisdiction pursuant to the following statutes:
 - a. Federal Ouestion Jurisdiction: Title 28 United States Code § 1331;
 - b. Federal Regulation of Commerce Jurisdiction: Title 28 United States Code § 1337;

- c. Federal Supplemental Jurisdiction: Title 28 U.S.C. 1367(a);
- d. Federal Declaratory Judgment Act of 1946: Title 28 United States Code §§ 2201-2202:
- e. Federal Supplemental Jurisdiction: Title 28 United States Code §§ 1367(a)- (b);
- f. Section 1964(a) of the Racketeer Influenced and Corrupt Organizations Act of 1970 ("RICO") Title 18 United States Code §§ 1964(a), (b), (c), and (d);
- g. RICO 18 U.S.C. § 1965(a), (b), and (d); and
- h. Rules 57 and 65 of the Federal Rules of Civil Procedure; and
- i. The general legal and equitable powers of this Court.
- 2. Venue is proper under 28 U.S.C. § 1391(b) as one or more Defendants are located or reside in this District, and a substantial part of the events and omissions giving rise to Plaintiffs' Claims occurred in this District.

II. PARTIES

- 3. PLANTIFF JANICE WOLK GRENADIER (Janice) Citizen, Born in the United States of America giving her the rights as defined by the United States of America Constitution, the Bill of Rights, The Laws and Rules of the Supreme Court. THE BASIC RIGHT TO A FAIR TRIAL WITH OUT A BIAS JUDGE. Was illegally jailed and warfare tortured used for two purposes prevent e-mails between Senator Mark Warner and herself being exposed in regard to the corruption and for the cover up of the criminal actions of Divorce Lawyer Ilona Grenadier Heckman, Erika Ely Lewis and David Mark Grenadier
- 4. **DEFENDANT UNITED STATES OF AMERICA (USA)**—Responsible for several of the Agencies FBI, DOJ that oversee employees in the Judiciary that prevented Fair and Open hearings in the court, and to protect citizen Janice from harm that was inflicted on her.
- 5. **DEFENDANT COMMONWEALTH OF VIRGINIA (VA)-** Responsible for several of the Agencies that oversee employees in the Judiciary (Judges) that prevented Fair and Open hearings in the court, and to protect citizen Janice from harm that was inflicted on her, as well as Elected Officials.
- 6. **DEFENDANT CITY OF ALEXANDRIA (COA)** Responsible for several of the Agencies that oversee employees in the Judiciary that prevented Fair and Open hearings in the court, and to protect citizen Janice from harm that was inflicted on her. Oversees Sheriffs, City of Alexandria Police, and Attorneys not limited to other agencies.
- 7. **DEFENDANT GRENADIER STARCE DUFFETT & KIESER (GRENADIER LAW)** Employer of several lawyers who conspired to harm Janice. That ignored their responsibilities per the Professional Code of Ethics.
- 8. **DEFENDANT MICHAEL WIESER ESQ -(WIESER)** Lawyer who conspired to harm Janice. That ignored their responsibilities per the Professional Code of Ethics

- 9. **DEFENDANT REED SMITH** (**REED**) Employer of several lawyers who conspired to harm Janice. That ignored their responsibilities per the Professional Code of Ethics
- 10. DEFENDANT RICH ROSENTHAL BRINEFIELD MANITTA DZUBIN & KROGER LLP (RICH) Employer of several lawyers who conspired to harm Janice. That ignored their responsibilities per the Professional Code of Ethics
- 11. **DEFENDANT BWW LAW GROUP (BWW)** Employer of several lawyers who conspired to harm Janice. That ignored their responsibilities per the Professional Code of Ethics
- 12. DEFENDANT TROUTMAN SANDERS aka Mays & Valentine –(TROUTMAN) Employer of several lawyers who conspired to harm Janice. That ignored their responsibilities per the Professional Code of Ethics
- 13. **DEFENDANT PARKER, SIMON & KOKOLIS, LLC PARKER)** Employer of several lawyers who conspired to harm Janice. That ignored their responsibilities per the Professional Code of Ethics.
- **14. DEFENDANT KELLERHECKMAN (KELLER)** Employer of several lawyers who conspired to harm Janice. That ignored their responsibilities per the Professional Code of Ethics
- 15. DEFENDANT VIRGINIA STATE BAR -(VSB) Independent agency in the State of Virginia and responsible for the oversight of lawyers who conspired to harm Janice. That ignored their responsibilities per the Professional Code of Ethics
- **16. DEFENDANT DIMUROGINSBERG (DIMURO)** Employer of several lawyers who conspired to harm Janice. That ignored their responsibilities per the Professional Code of Ethic
- 17. DEFENDANT NEIL GURVITCH ESQ (WECHELER, SELZER & GURVITCH, CHARTED) (Gurvitch) conspired to harm and acted to assist Ilona, Erika and David to steal money and real property from Janice acting in official capacity as a lawyer. Did a Liquidation agreement on or around November 17, 1997 not licensed as an attorney in Virginia for a Virginia Partnership and all Virginia Properties, he is the only lawyer besides Ilona listed on the agreement. That he ignored his responsibilities per the Professional Code of Ethic
- 18. DEFENDANT ILONA GRENADIER HECKMAN (Ilona) Divorce Lawyer, Lawyer to Janice Wolk Grenadier on manipulating money to pay back what she had stolen from the Sonia Grenadier Trust. Has liable and slandered Janice with her gang that she has hired or manipulated. Owes Janice over \$20 Million dollars through theft by doing Liquidation Agreement of properties that Janice had ownership to by right of her marriage. That as a Divorce lawyer she had knowledgeable intend, and knew the law. Party to the Virginia Old Boys Network

- 19. DEFENDANT DAVID MARK GRENADIER (David) Ex-Husband to Janice Wolk Grenadier. Divorced in June of 2000 with no property settlement agreement. Conspired with his mother Ilona to manipulate and steal from Janice starting in December of 1986.
- **20. DEFENDANT ERIKA ELY LEWIS (Ericka)** Daughter of Divorce Lawyer Ilona Grenadier Heckman who stole property and money from Janice when she signed the Liquidation Agreement taking ownership in GIC. Married to Timberlake Lewis who is included in Real Estate Partnerships from by all appearance 2003
- 21. DEFENDANTS JOHN DOE unknown actors for or of the above defendants
- 22. DEFENDANT JANE DOE unknown actors for or of the above defendants

III. BACKGROUND

- 23. Janice met Defendants David, Ilona and Erika around March of 1985. That Janice was naive and in many ways very easily manipulated by David and Ilona. At the time she met David she was still filling the effects of having not finished college due to her apartment being broken into and raped, and now a failed marriage.
- 24. That David and Ilona started their manipulation with knowledgeable intend around December of 1986.
- 25. That the first lie that Janice can recall was February 14, 1986. Ilona was very specific having just married Jerome (Jerry) Heckman the 1st cousin to Judge Albert Grenadier whom had just passed March of 1985. Ilona stated and was so excited how Jerry had added her to his will. Janice found this odd, but in or around April of 2014 learn that what Jerry had done that day was give up his rights to a property she by all appearance had stolen from Sonia Grenadier and taken a portion of a \$521.000. Pay off for the sale of a portion of the property.
- 26. That David and Ilona stated a Real Estate Partnership called GIC in or around 1985 that Janice started contributions thru loans, advice along with a partnership call Bellefonte Ave on or around December of 1986.
- 27. That David and Janice would marry in September of 1988 which in or around 1998 Janice would learn that David never loved her and that he and Ilona had used her, manipulated her and she was no longer needed.
- 28. That in or around March of 1990 Janice would learn that money had been stolen out of a Trust Account of Sonia Grenadier through the Grenadier Law firm.
- 29. That Lawyer Ilona would tell Janice she is to speak to no one about this. Everything goes through her, that she will handle everything as an attorney through Grenadier Law. The slippery slope, the manipulation of the fear as Ilona made it clear to Janice who was pregnant and just had a miscarriage that if she spoke about this to anyone that David would go to jail and be raped repeatedly and that my

- child would being visiting him in jail. Ilona knew of my rape and used it to manipulate and to protect herself from being found out.
- 30. Janice was manipulated by Ilona into believing that it was David who stole the money. That in or around May of 2008 Ilona would admit to Janice that David did not steal the money which only left Ilona Which the slippery slope of the Criminal Acts, the Knowledgeable intend of the extreme Divorce Lawyer Ilona Grenadier Heckman would go for money started to unravel, that the :"TRUTH" supposedly your best defense would all of a sudden have no meaning to the Judiciary in Virginia and Washington DC. The thefts with the help of the Judiciary began in or around November of 1983 with the Forgery of Sonia Grenadier's name on an Amendment to her Trust giving Ilona Grenadier access once Judge Albert Grenadier died and the COVER UP to protect one of their own began in or around 1990 with the help of Fagelson et al law firm and Mays & Valentine aka Troutman Sanders.
- 31. Then on or around September 3rd of 1997 that on an unexpected cab ride to the airport as David was suppose to drive Janice to the airport and was late, Janice was outside waiting and not in her home. Janice had called him to find out where he was David started yelling at Janice and saying a cab was on the way. Janice can persume now his disappointment the money it appears he and Ilona spent to have Janice killed has come back to haunt them. When Janice got in the cab and the driver could hear David yelling he said to Janice hang up the phone, hang up the phone if you don't hang up the phone I will pull over and hang it up for you. Janice hung up the phone, the driver than said we can take care of that for \$5,000.00 you don't have it then \$2,000 we can work it out. Janice was handed a phone number, Janice tossed it in the trash can thinking it had been a set up Janice now believes with out question it was to be a hit and today she was to be dead. Janice has never been questioned by the City of Alexandria Police or the FBI even though she has reached out several times with her information.through Commonwealth Attorney Brian Porter & Sheriiff Lawhorene (who had her tourtured in jail)That in February / March of 1998 Nancy Dunning who would open her front door in 2003 came to Janice on different occations to check on her safty. The question know arrises was Nancy aware of the outcome that was meant for Janice in September of 1997.
- 32. That the above is important because where Janice live's in a circle around Janice thier have been 5 known Murder type hits Dr. Rixsey, John Doe, Nancy Dunning (Nancy came to Janice's home twice to check on Janice, now believed Nancy knew more and was from what Nancy said afraid of what could happen and maybe knew what was going to happen to her) Ron Kirby and Ruth Ann Lodato. That all five have strong connections to the Old Boys Network. That the appearance and whith the Facts Janice knows that the people who have been charged and found guilty of these charges of murder and the reson behind them was fabricated to protect the Old Boys Network of Virginia. That further

- situations / evidence will show that thoughout Northern Virginia hit men are hired and it is a pattern and practice of the Old Boys Network in Virginia to either have someone killed or to Bully them till they committ Suicide.
- 33. **November 1997** That Lawyer Ilona in collusion with David Grenadier, Andrea Grenadier, Robin Grenadier passed a rumor around that caused David Grenadier to pull a gun in the home with Janice's girls in the home.
- 34. That on or around November 17, 1997 David, Ilona and Erika would sign a Liquidation agreement of several properties that are all owned in Virginia and a Virginia Partnership done by Lawyer not licensed or never has been licensed to act as a lawyer in Virginia. Ilona being a divorce lawyer knew the law and acted criminally as she had done with the Sonia Grenadier Estate for personal financial gain using her law firm and POWER of the men she married to manipulate / Scheme / Scam those that were not as strong or did not know the law or who would ignore the law for her.
- 35. That in or around June of 2000 David and Janice were divorced with out a property settlement.

IV. STATEMENT OF FACTS

- 36. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 37. That on or around September 5, 2007 the Slippery Slope of the Cover up of Ilona Grenadier Heckman with the help of the other Defendants would begin with *September 5, 2007* Janice Filed with the Alexandria Circuit Court a Motion for Reinstatement of the Bill of Complaint of 28 E Bellefonte Ave Partnership. The notification to the parties to be served through the Sheriff's office. The court date for the Motion to be heard was on September 12, 2007.
- 38. On or around September 12, 2007 Motions Day Judge Kloch hears the case. This resulted in the Filing of the Motion for Default filed on September 21, 2007. As the Motion for Default goes into more detail Ilona was disingenuous in court claiming she hadn't been served. But, Ilona couldn't have known of the court date unless she was served. Ilona admitted in court to Judge Kloch that David Grenadier's attorney Mr. Michael Weiser was aware of the court date because Ilona had faxed the information to Wieser. Judge Kloch kept passing it over to give Mr. Weiser the chance to show up. He then sent a clerk down to the Sheriff's office who then came back and according to Judge Kloch said that Ms. Ilona Grenadier nor Mr. Weiser had been served according to their (the Sheriff's) records. Janice explained to the Judge the only way Ilona could be there was if she was served. Mrs. Ilona Grenadier admitted to having the information and faxing it to Mr. Weiser. At which point he dismissed everything to be reheard. Ilona a lawyer had not been telling the truth when she said she hadn't been served. The

- Slippery Slope begins for a fight for Judge with Jurisdiction that is not ruling on Favoritism and Cronyism.
- 39. After Court Janice went down to the Sheriff's office. <u>Janice was given a copy of Ilona's service.</u> Mr. Weiser's papers were not in the box, and as his office is basically the same building they couldn't say whether he had been served or not. To this day the papers are missing and have never been returned to JWG. It should be noted that Mr. Weiser's office is in the same building as the Court House and Sheriffs, who claim to not have served him.'
- 40. September 21, 2007 Janice filed for the Motion for Default, and The Motion to Reinstate (just in case) for October 10, 2007. Motion for Default filed (written by federal Judge in DC)
- 41. October 10, 2007 All the Alexandria Judges have recused themselves from hearing it and they need to bring in an impartial Judge. This is the start of shopping for Judges that would rule in favor of Lawyer Ilona. Even when Ilona would brag afterwards about her relationship with the Judge and how he had called her when he was practicing law and she would help him out
- 42. October 17, 2007 Letter from Dianc Fiske After informing Janice that the Judges had recuse themselves she would be finding Judge's to hear the case. Judge Frank A. Hoss was available for November 28, 2007 at 10.00 am. At the time of this letter the Judges were:
- 1. <u>Judge Donald M. Haddock</u> We learned in the Spring of 2008 he had recused himself from hearing the case, yet continued to choose the Judges after declaring his "LOVE" for Ilona.
- 2. <u>Judge John E. Kloch</u> Ilona had lied to him in court on September 5, 2007 He could have heard the Motion for Default as he knew the truth Recused himself with letter of apology and Statement Appellant deserved a fair hearing and that "The appearance of Justice was just as important as Justice itself"
- 3. <u>Judge Lisa Bondareff Kemler</u> Her Father was our pediatrician for Janice's girls, David had gone to Hebrew School with her, His father and her father were good friends, Janice had shown her and her husband Real Estate.
- 43. November 15, 2007 Letter from Diane Fiske that the Motions Date had been changed to Wednesday, December 5, 2007 @ 10.00 am this had been filed on September 21, 2007 Is now being heard on December 5, 2007. Where most Motions are heard 7 days later this took 2.1/2 months to be heard. By all appearance due to the need of shopping for a Judge.
- 44. The three (3) attached letters from Diane Fiske court administrator shows the City of Alexandria Circuit Court did not make a mistake. The actions of the City of Alexandria Circuit Court were knowingly and malicious to shop for Judges that would Rule in favor of attorney Ilona Grenadier Heckman.

 That Judge Hoss from Prince William County had in 1990 recused himself from hearing any cases that involved Ilona Grenadier Heckman. By all appearance he knew it was inappropriate for him to hear this

- case. In the Motion to Re-Open due to the Fraud on the Court is signed by Judge Hoss of Prince William County. That once Judge Hoss by all appearance recused himself a 2nd time. The Judge's in the Circuit Court cannot say any longer a mistake was made. The Judge's in the Circuit Court of Alexandria knew exactly what they were doing. That they knew of the Supreme Court rule <u>Supreme</u> <u>Court Rule §17.1-105(B)</u> and chose not to follow the rules of the Supreme Court of Virginia. Attached find Letters:
- Dated: October 17, 2007, November 15, 2007 That pertain to Judge Frank Hoss who had recused himself back in 1990 and by all appearance recuses himself again.
- Dated: May 13, 2008 sent just a few days after Chief Judge Haddock explains to Appellant <u>"You will never get a fair Trial "WE LOVE ILONA"</u> These letters expose the collusion of the Circuit Court Judges in the State of Virginia FRAUD ON THE COURT TREASON on the Court. This by all appearance shows the disingenuous behavior of the Supreme Court of Virginia in ignoring their own Rules and Laws to protect one of their own.
 - 1. December 5, 2007 Judge Thomas A. Fortkort. Denied Janice's Motion for Default. It should be noted the Motion for Default was a suggestion & outlined by a Federal Judge from DC.
 - 2. **December 2007 Janice Asked Diane Fiske Several times** about a Fair Judge she informs

 Janice the only way anyone else (Supreme Court chose's Judge) Is if they can't find one. Which is
 incorrect the rule is the complete opposite –

in accordance with §17.1-105(B): Learn of June of 2010

If all the judges of any court of record are so situated in respect to any case, civil or criminal, pending in their court as to render it improper, in their opinion, for them to preside at the trial, unless the cause or proceeding is removed, as provided by law, they shall enter the fact of record and the clerk of the court shall at once certify the same to the Chief Justice of the Supreme Court, who shall designate a judge of some other court of record or a retired judge of any such court to preside at the trial of such case.

- 45. **February 8, 2008** Janice receives a Letter From Ilona Grenadier (on her law firm stationary) to Janice Wolk Grenadier, Ilona Grenadier asserts ownership of 75% of a property Known as 28 East Bellefonte Ave, Alexandria, VA 22305. <u>Janice felt threatened by the letter which is full of misleading and deceitful statements</u>.
- 46. February 13,2008 Judge Brown hears Motions * Ilona is not in court Heather Jenquien represented her. Motions to compel -
- 47. **February 26, 2008** Filed with Clerk of Courts following letter: Because keep in mind all Judge's had recuse themselves and all Motions had to go through Diane Fiske as she needed to shop for a judge or it

- had to be on a day they had a visiting Judge that would rule in collusion with Judge Haddock's "LOVE" for Ilona. The letter asks Ilona for dates to get back to Diane Fiske to file a Motion as no Motion's could be filed without everyone's ageing on the date before Diane found a Judge.
- 48. **February 27, 2008** Ilona Grenadier filed on February 27, 2008 with the Circuit Court of The City of Alexandria an Answer to The Amended Bill of Complaint claiming 75% ownership of the property at 28 East Bellefonte Ave., Alexandria, VA 22305 which is a documented lie. Most of Ilona Grenadiers statements in the Answer to The Amended Bill of Complaint were disingenuous which Plaintiff has supplied documentation to VSB for the purpose of establishing the truth. The following are the lies Ilona Grenadier Filed with the Circuit Court of Alexandria
 - 1. 75% ownership
 - 2. That plaintiff has provided no proof of actual payment for expenses provided 3 times to defendants
 - 3. Plaintiff's Bankruptcy caused by Bellefonte as Plaintiff in & out Which now Plaintiff realizes she would never had been in and out if it wasn't for the manipulation and lies of Ilona Grenadier
 - 4. 4 times Ilona "Defendant, Ilona Ely Grenadier, denies that Plaintiff owns or owned 50% of East Bellefonte.
- 49. The document on February 27, 2008 by Ilona Ely Grenadier a lawyer was riddled with Lies The VSB The Judges in Alexandria and her good friend Judge Brown had no problem with that. This can be backed up with information/documentation from Admission statements from Ilona Grenadier which had several conflicting statements. The amount of money Ilona Grenadier put into the property can be established by an accounting done by Ilona Grenadier. The Accounting shows the 25% down payment that was contributed in the purchase of the Bellefonte Property. The documents that were filed with the Motion for Default in the Circuit Court of Alexandria can be used to verify the amount of ownership Ilona Grenadier had. Ilona Grenadier had in her possession the documents which showed her ownership at the time she filed the pleadings. Those pleadings were disingenuous and misleading when filed with The Circuit Court of Alexandria.
- 50. March 5, 2008 File 2nd Motion for Default to be heard March 12, 2008 for the following reasons:
- 1. For all the reasons as stated in Motion for Default Dated September 21, 2007
- 2. For all the untruths told in the Answer to Bill of Complaint by defendant and Counterclaim and Cross-Complaint filed on February 27, 2008.
- 3. For the letters Lawyer Ilona sent bulling, threatening attached to the February Response to Ilona Ely Grenadier/GIC Motion to Quash Janice's Amended Complaint / February 8, 2008.

- 4. For the non response to letters to try and set a new date for depositions or to set a trial date.
- 51. March 5, 2008 Filed Motion to Change Date for: Notice of Deposition and to Set Date for Trial As Lawyer Ilona would not respond to any correspondence.
- 52. March 11, 2008 Plaintiff files Praecipe remove Motions for March 12, 2008 no visiting Judges. As ordered by Judges Chambers.
- 1. Clerk of the Court will please remove from the docket on March 12, 2008 Janice Wolk Grenadiers Motion to Compel as there isn't a visiting judge available to hear it.
- 2. This again show's that the Circuit Court Judge's had recused themselves. That Janice though out the case voiced her concern on getting a fair Trial. To the deaf ears of the Circuit Court of Alexandria who took the arrogant view of doing whatever they wanted to do.
- 53. April 30, 2008 Parcipe re-file to have Motion for Default heard as Diane Fiske has found a date that works for the Judge's of Alexandria to find a Judge of there choice for May 7, 2008
- 54. May 7, 2008 Motions heard by Judge Brown Ilona after court informs me after he has ruled in her favor allowing her to file false papers as an attorney in the Alexandria Circuit Court of law What good friends she and Judge Brown are and how he called her all the time for legal advice.
- 55. On or around May 7, 2008 After Court ~
- 1. Lawyer Iloan Grenadier again brags about her relationship with the Judge's That she has in the past & continues to give Free legal advice to Judge Brown.
- 2. Lawyer Ilona Grenadier explains to Janice why no one has anything do to with Janice's children is because Janice raised them Catholic. In 19 years she has seen the girls once by her choice.
- 3. Lawyer Ilona states: That Janice should be grateful to her for the listing on Holland Road. So Lawyer Ilona could steal the commission
- 4. That Ilona doesn't believe David Stole the money from Sonia Grenadier's Trust which only left Ilona Grenadier and her law firm to steal the most likely over \$95,000.00
- 5. Janice introducer's herself to Judge Haddock after he speaks with llona he explains to Janice "I could never get a fair trial as they all Love Ilona" I turn to Diane Fiske shocked by the statement and express Janice can't believe he just said that to me.
- 6. Again Janice ask Diane Fiske about getting Judge's that aren't friends of Lawyer Ilona's.
 - 56. May 13, 2008 Letter from Diane P Fiske that the case would be heard by Judge John J. McGrath.

 This letter show's the following Judge's in the letter head:
 - 1. Donald M. Haddock

- 2. John E. Kloch (Retired) which means at the time Judge McGrath was chosen Judge Kloch and Judge McGrath were working together.
- 3. Lisa Bondareff Kemler
- 57. June 18, 2008 Plaintiff Files:
- 1. Motion for Default Ilona has lied in the Admissions
 - A. For Ilona lying in court to Judge Kloch on September 12, 2007 Motion for Default
 - B. For Motion for Default filed in February for Lying in the Answer to Bill of Complaint by Lawyer Ilona and Counter claim and Cross Complaint
 - C. For lies in Admissions by Lawyer Ilona
 - D. For the letters Lawyer Ilona sent Bulling & Threatening Janice if Janice didn't drop suit.
- 2. Motion for Trial by Jury Due to comments made by Judge Haddock & Lawyer Ilona Grenadier
 - A. Judge Haddock telling Janice she could never get a fair trial as they all "LOVE" Ilona
 - **B.** Lawyer Ilona informing Janice all the Judges were friends of hers & Lawyer Ilona gave them free legal advice when they called her
- 58. **July 2, 2008** Motion to be heard July 9, 2008 to include:
- 1. Motion for Trial by Jury
- 2. Motion to Compel
- 3. Motion for Default
- 59. **July 28,2008** 1st Complaint Virginia Bar Complaint Outline / Ilona Ely Freedman Grenadier Heckman VSB Docket # 09-NAT-076104
- 1. That Lawyer Ilona lied in court on September 12, 2007 All facts can be found in the Motion for Default Dated September 21, 2009 Which a copy was sent in with the complaint
- 2. Letter from Mrs. Ilona Grenadier suggesting Janice had better drop the suit Dated February 8, 2008
- 3. Ilona presented false statements in her Counter Claim and Cross Complaint which can be proven through her own documentation. These false statements were filed and are in Court Record.
- 60. **July 9, 2008** Judge Howe Brown (as Lawyer Ilona calls him a very good friend she often gives free legal advice to) rules :
- 1. Denies motion for Default

- 2. Denies motion for Trial by Jury
- 3. And makes both sides work on response's in the Motion to Compel- Even though Janice had 110% Answered
- 61. Spring of 2008 Diane Fiske again advices Janice the only way anyone else would choose a Judge was if they couldn't find one then it would go to the Supreme Court and they would then choose the Judge. Which was incorrect / deliberate misleading, Obstruction of Justice. The minute in September of 2007 when the Judge's had recuse themselves is when the Supreme Court should have been choosing the Judge's not the Judge's themselves or Diane Fiske should have been choosing the Judge. The Head Judge Judge Haddock was talking and hugging Ilona while I was talking with Diane Fiske about Fair Judge's that were arms length. When Ilona left I turned to Judge Haddock and introduced myself which he then went onto inform me "I (Janice) wouldn't get a fair trial because they all "Loved Ilona".

 Judge Haddock is the Head Judge at the Alexandria Circuit Court. I then turned to Diane Fiske in shock and said I can't believe Judge Haddock just told me "I would never get a Fair Trial because they loved Ilona".
- 62. August 4, 2008 Janice received a letter from Mr. James C. Bodie saying they would not be taking action against Ilona. Janice then did pursue it and asked them to review it again after sending in more information. Janice was also turned down on the review. I was basically told because Ilona wished for a different outcome her behavior was acceptable to the Virginia Bar, Lying in court, Lying in court documents.
- 63. September 11, 2008 Thursday Judge John McGrath (chosen by Judge Donald Haddock and working with Judge Kloch) Court Date As Justice Douglas would call it "Kangaroo Court"
 - A. Conference in Judges Chambers Only Ilona & Janice didn't include David Janice in retrospect was told by another member of the Old Boys Network that she would loose and now realizes how this and other actions had been discussed and decided to protect one of their own.
 - B. Judge Kloch hanging outside the door during the conference and the trial. Who if he didn'
 - C. Sonia Grenadier Trust brought up in opening By Ilona & David and Janice was questioned about it by Ilona Janice was denied entering evidence or bring it up
 - D. Judge McGrath Won't let Janice bring up Sonia Grenadier Trust & Doesn't understand it won't take time to understand
 - E. Judge Warns Janice on how Janice can question Ilona
 - F. David Grenadier lies under oath move on per Judge McGrath perjury by David or Ilona was/is acceptable by the courts

- G. Judge McGrath & Judge Kloch had a very friendly Lunch at Jackson 20 to discuss how to show appearance of being fair but, to SCREW Janice, as she is no longer one of the Old Boys Network.
- 64. Janice is sure something is off and contacts Randy Sengel Commonwealth's Attorney Informs me that Judge McGrath has done a lot of work in Alexandria Circuit Court
- 65. Janice Calls JIRC Commission Donald Curry good friend to Judge McGrath was raised in Arlington
- 66. Alexandria Circuit Court Yes McGrath is from Harrisonburg But, has several ties to Alexandria & is working w/ Judge Kloch guess they just didn't think that was important
- 67. Janice Files complaints w/JIRK Commission of course I didn't have all the information and Donald Curry who make's decision is friends w/ everyone
- 68. September 22, 2008 Monday File Motion for Reconsideration With new evidence that had been dropped off at Appellants house A letter that David Ellsberg the Settlement attorney for Bellefonte had me write him that showed I was loaning the money to Ilona / David / GIC
- 69. September 24, 2008 Diane hears back from Judge McGrath doesn't want to see new evidence or any Exhibits Faxed to him never seeing Exhibits immediately Denies
- 70. October 21, 2008 Janice Mailed from Alexandria Virginia a complaint against Judge John McGrath to his good friend Donald Curry w/ the JIRC Commission, after a phone conversations with Mr. Curry, where Mr. Curry informed Janice "sending a complaint would be a waste of time as Judge McGrath was a good friend of his".
- 71. October 23, 2008 Donald R Curry Counsel for JIRC sends Janice the following (after telling Janice on the phone not to bother with a complaint:

"This is in response to your complaint dated October 21, 2008. Based upon what you have submitted and alleged, we have found no basis for a conclusion that there has been a violation of the Canons. A mere "belief" that an ex parte communication occurred, without more, does not provide a sufficient basis for Commission action. Please be advised, moreover, that the judge about whom you complaint is a retired judge from the 26th Circuit."

- 72. October 27, 2008 Janice Fax to Randy Sengel with copy of Complaint and response to JIRC Commission. How out rages it was. Randy suggestion was Janice address members directly.
- 73. November 12, 2008 Janice Reached out to each member of the Courts of Justice by Phone or Fax -
- 1. Judge Larry D. Willis
- 2. Honorable Virginia L. Cochran
- 3. James F. Fisher Esq

- 4. William I Fitzgerald
- 5. Judge Cleo E. Powell
- 6. Olivia A. Welsh
- 7. Kenneth Motero 804-786-6634 Boss to Donald Curry
- 8. Tim Kaine Governors' office 804-786-2211
- 9. Bob McDonnel Attorney General 804-786-2071
- 10. Donald Curry General Assembly
- 11. Department of Human Resources Mgt 804-225-2131 Carol Supreme court - HR

Virginia House of Delegates - Courts of Justice

- 1. Dave Albo Chair
- 2. Pamela Burham

Virginia Senate –

1. Henry L. Marsh III - Chair - Contact Comm operations (804) 698-7450

Delegate - Alexandria

1. David Englin - 804-698-1045 703-549-3203

Senator

1. Patsy Ticer 804-698-7530 703-549-5770 Spoke with detail to Peggy Fax# 703-739-6761 - Gave me Mr Henry Marsh's number - information

Congress

- 1. James Moran
- 74. November 12, 2008 Fax to Henry Marsh Jackie Parker copy of complaint
- 75. **November 12, 2008** Fax to Dave Albo after horrid conversation. Dave Albo supports the corruption by all appearance and actions of the Judiciary, the Government and Elected Officials.
- 76. November 12, 2008 Fax: Donald Curry adding letter date May 8, 2008 that Ilona had written to Janice, that Judge McGrath had used in making his decision on this little meeting prior to court. Which in 45 minutes he would never had found in a file that was about 8 10 inches in paper work.
- 77. **November 13, 2008** –Letter from Donald Curry that the letter I had sent didn't change his mind that there should be an inquiry into Judge John McGrath.
- 78. November 13, 2008 letter from Henry L. Marsh III He referred me to The Chief Justice of the Virginia Supreme Court as he was in charge of Substitute Judges. Chief Justice Leroy Rountree Hassell, Sr. 100 North Ninth Street, Richmond, VA 23219.
- 79. December 8, 2008 Fax info to Donald Curry he is of no help

- 80. **December 8, 2008** Calls to Chief Justice Leroy Rountree Hassell Sr. requesting a meeting spoke with Chief Deputy Clerk Leslie David to put complaint in writing.
- 81. **December 10, 2008** Letter from Donald Curry of Judicial Review they are not looking at my complaints They are friends of the Judges.
- 82. **December 18, 2008** Reach out to John McGrath to get him to do the right thing no word back From the letter Pleading with him to do the right thing and reconsider the Motion for Reconsideration or at least be respectful and look at the new evidence. Sent him several e-mails giving him more evidence and do to the right thing.
- 83. **December 18, 2008** Janice learn from the internet that Judge John Kloch is now working with Judge john McGrath Jr. with a firm called Judicial Solutions' PC *In Letter from Judge John Kloch –Which even makes this more of a conflict of interest. Not an arms length situation. If it isn't enough to have the Commonwealth's Attorney tell you Judge John McGrath has done a lot of work in the Alexandria Courts.

84. April 29, 2009 ~ Virginia Bar Complaint #2

With the first Complaint Ilona had broken the Ethics rule on Knowingly Filing false information with the courts, making false statements in Court, recording documents along with Admissions statements that were disingenuous, and lying in Court. She now had broken the Ethics Rule 1.16 (d) and (e) by refusing to give me the NOTE that she as my lawyer had written and had insisted on being the only one to hold on to it. I attached much evidence on this complaint of Ilona being very disingenuous. With all her statements she made and how she mislead all the other attorneys with the truth of the amount of funds that were stolen from the Sonia Grenadier Trust. I have also shown how she personally financially benefited from all of these actions, my millions of dollars in Real Estate.

- *** These complaints by my understanding from Mr. Edward L. Davis have been combined and looked at together.
- ***Appellant feels from his letter he doesn't even understand the complaints nor is he looking at the evidence that has been provided to show that Ilona is lying.
- *** An attorney who teaches Ethics for the VSB helped Appellant to write complaint
- 85. In the later part of 2008 2009 Janice reached out to Karen, Andrea, Robin Grenadier and the family of Ruth Grenadier to apologize and inform them of the "TRUTH" of what Ilona an attorney had stolen from the Sonia Grenadier Trust. Through the Grenadier et al law firm. After Ilona informed JWG that JWG should be grateful to Lawyer Ilona for Lawyer Ilona giving Janice the listing on the property called Holland Road it started to became clear to Janice the manipulation and the lies and collusion of Lawyer Ilona and x-husband David Grenadier to steal, lie, cheat and that the collusion now is clear that it started

back in October of 1986 and has continued through this case. That Lawyer Ilona will be able to show through pay stubs, through financial statements and accountings done by Janice that it was with her knowledge this money was stolen out of her law firm. That trying to silence Janice is about the "TRUTH" of the Money, Real Estate and other things stolen from the Sonia Grenadier Trust -

- 86. The facts The accountings cannot be changed. Ilona Grenadier / Lawyer / has been misleading and manipulating family members, lawyers, judges since the death of Judge Albert Grenadier.
- 87. On or around February 9, 2009 an e-mail from Andrea Grenadier:

Thanks, Janice!

Interesting point about only inheriting a few thousand from dad. **Hona had re-written** dad's will, as you know, after she had promised him that she would "take care of" his children. Of course, we all found out what "take care of"

meant to her! The several thousand dollars we inherited wasn't actually that much -- it was from an insurance policy that dad had, and it was about \$1,200. She was incredibly pissed when she found out that she had missed that, because she wanted everything. Dad's former secretary, Agnes Wilkes, knew that there was an earlier will, and so did Jack Duvall. Ilona said they were both lying.

My grandfather's mistake was in trusting too much, and not putting his property in a bypass trust. But when he died, my parents were splitting up, and there was no reason to believe that dad would marry someone like Ilona. My grandfather would have been highly distressed to know that someone stole his grandchildren's inheritance, but this doesn't seem to bother Ilona, who has constantly lied to me, and told me there wasn't anything.

Love,

- 88. On or around April 16, 2009 Threatening Letter from Ben DiMuro charging Defendant with acts of Extortion. The Slippery Sloop of the Corruption in the Old Boys Network goes into full force
- 89. July 2009 Letter Chief Justice Supreme Court of Virginia ignored
- 90. June 21, 2010 Letter to Patricia L. Harrington Supreme Court Clerk ignored
- 91. August 2010 Virginia Attorney Calls Diane Fiske she confirms all the Judge's in The Alexandria Circuit Court had recuse themselves in September of 2007
- 92. July 2010 Janice Confirms the Rule 17.105 (b) with the Supreme Court
- 93. **July 12, 2010** e-mail to Lawyer Ilona that Janice was filing Motion for Default to be heard on September 21, 2010 which was originally to be heard on July 28, 2010
- 94. **July 13, 2010** File Motion

- 95. **July 26, 2010** w/ 4 min left Michael Wieser files he can't be there in collusion with Judge's by all appearance and **ex-parte communications**
- 96. On or around July 28, 2010 Ilona files Opposition weren't we supposed to be in court on the 28th? when she knew
- 97. **August 4, 2010** After being reprimanded by the Circuit Court about contacting everyone being treated rudely now every time Janice calls the Alexandria Circuit Court Janice files Motion to be heard on August 11, 2010
- 98. August 11, 2010 Judge Kloch visiting Judge
- 99. **August 11, 2010** Janice is informed my The Circuit Court they will not take her phone calls or any messages from her
- 100. **August 12, 2010** Janice receives an e-mail Judge Kloch Decides to recluse himself works with Judge McGrath
- 101. Quote from Judge Kloch's letter "I believe strongly that the appearance of justice is equally important as justice itself"
- 102. January 20, 2011 Janice Appeal to Supreme Court Record # 110156
- 103. February 2, 2011 Lawyer Ilona -Letter Ben Dimuro Giving notice file dismiss of Petition for Appeal
- 104. February 3, 2011 IEG By Lawyers Ben Dimuro / Michael Wieser Joint Motion to Dismiss Petition for Appeal
- 105. February 8, 2011 Janice Petitioner's Response to Respondents Joint Motion to Dismiss Petition: For Appeal Petitioner's Response to Respondents Joint Motion to Dismiss Petition For Appeal on Page 2 Respondents state "Petitioner's state Petitioner failed to ensure that the record contains either a transcript or a written statement of facts necessary to permit resolution of appellate issues is fatal to her appeal. Accordingly, the Petition should be dismissed for Petitioner's non-compliance with rule 5:11"

 Petitioner filed "Court Statement of Facts for October 13, 2010 & October 20, 2010 Order o Made a part of Record in accordance to Supreme Court Rule 5:11 (c) (1) and (2).
- 106. February of 2011 after many phone calls starting on around November 3, 2008 with assistant to Patsy Ticer a meeting is had—even though I live walking distance in Alexandria—to have meeting I had to go down to Richmond which she was still toooo busy to meet with me and set me up with an older women who claimed ot be her assistant—I would find out later that was a "LIE" Instead: set me up with Martha Kent x-wife of Judge Kent. I will not be spineless like Martha Kent and Patsy Ticer and allow a bunch of overgrown "BULLIES" to control me as they have them. After listening to my story—she said to me

- o "Do you know who I am?" no
- o "I am the x wife of Judge Donald Kent" Martha Kent
- o "I have walked in your shoes you can't win this"
- o "Me and My family can't get a fair trial either"
- o "You are no longer one of them"

That is when a few more pieces of the puzzle as to who was the <u>King of the Old Boys Network</u> started falling into place – <u>Who was behind this</u> - it is and was her x-husband Judge Donald Kent best friend to Judge Donald Haddock – on the bench at the same time as Judge Grenadier. Judge Haddock chose all my Judges and stated to me "You will never win this – WE LOVE ILONA" - Judge Haddock and Judge Kent by all appearance have done everything they could for there "LOVE" Judge Donald Kent was a Judge when Judge Albert Grenadier was in the City of Alexandria by all appearance, and supports the "LOVE" Judge Haddock has for Lawyer Ilona.

- 107. February 10, 2011 Ilona Joint Brief in Opposition to Petition for Appeal
- Wolk Grenadier while she is on travel <u>Janice is supposedly "DEAD" in the home?</u> There is no record of this in the City of Alexandria. Two neighbors have confirmed this with Janice and the one who convinced the police to not hack down her door but to allow him to open it with the key he had. It was not till June of 2011 when Janice's neighbor shared this with her she became aware of it. When researched thier is no record yet two other neighbors have confirmed this.
- 109. May 4, 2011 Supreme Court of Va Letter to Janice May 24, 2011 Oral Argument
- 110. May 24, 2011 Janice does: Oral Argument in Richmond
- 111. June 20, 2011 Supreme Court Deny Petition Ruling against their own LAW Va. Code 17.105(b) to protect one of their own, for the "LOVE" of Judge Donald Haddock.
- 112. June 27, 2011 Janice Petition for Rehearing
- 113. September 20, 2011 Supreme Court Deny Petition for Rehearing
- 114. September 21, 2011 Janice Letters to Judges Brown McGrath Fortkort Dawkins Haddock
 That Janice planed on suing them
- 115. September 27, 2011 Janice Letter Sengel & Haddock for Grand Jury
- 116. September 29, 2011 Sengel Letter to Janice no Grand Jury
- 117. October 11, 2011 Janice Files Praecipe to be heard in front of Regular Grand Jury

- 118. October 5, 2011 Commonwealth Attorney Randy Sengel Letter to Janice no not going to let me in front of Regular Grand Jury
- 119. October 6, 2011 Janice letter to Sengel October 6, 2011 Janice letter to Ed Semonian Clerk of Court of the City of Alexandria
- 120. October 7, 2011 Sengel e-mail receipt of letter and sent Ed Semonian his letter
- 121. October 11, 2011 Refused Grand Jury Grand Jury Case # M01101482 October 2011 Denied access to the Grand Jury and kidnapped with witness into another court room. Even with a Demand from the Supreme Court Justice Cynthia Kinser to Be allowed into the Grand Jury to request a Special Grand Jury to review the Corruption
- 122. October 14, 2011 Janice Letter to Judge Haddock
- 123. October 14, 2011 Sengel Letter Judge Haddock retires end of December 31, 2011
- 124. October 20, 2011 Janice files in the Eastern District Court of Virginia

Complaint-Conspiracy to interfere with the Civil Rights 18 USC 241 & 42 USC 1983 Illegal Actions to Deny Access to Grand Jury. Trial by Jury. & More Emergency Motion for injunctive Relief

125. October 31, 2011 Janice Letter to Judge Lee exposing the Corruption – Ignored a pattern and practice of the Judiciary

126. November 9, 2011 Fed Court Order:

- a. Deny Request for in forma Paupers due to claim is Frivolous- which is and still is libel and slander to a ProSe Litigant. Denial of Due Process to someone for Being Poor.
- 127. November 16, 2011 Letter from the Circuit Court of Alexandria that the Supreme Court had conflicts with the date of December 12, 2011 due to schedule conflicts. The Circuit Court of Alexandria had not filed documents in timely manner
- Letter Judge Potter to sit on Grand Jury of February 13, 2012 Supreme Court Letter Judge
 Potter from Prince William County to sit on Grand Jury of February 13, 2011 "There is one matter, In
 Re: Grand Jury Request of Janice Wolk Grenadier, scheduled that the Judges have recused themselves from hearing." Order from the Supreme Court for Judge Potter to assist Alexandria Circuit Court
 November 23, 2011 Janice Files with Fed

Court:

i. Petition for Reconsideration of the "Frivolous" Order of 9 November 2011 Complaint -Conspiracy to Interfere with the Civil Rights 18 USC 241 & 42 ISC 1983 Illegal Actions to Deny Access to Grand Jury Trial By Jury

- 130. ** Janice Learns about the Magistrate can also bring charges Calls City of Alexandria Magistrate to learn that he requires a Police Report Janice then calls Detective Pak to ask for Police Report #
- Police Calls Records in Alexandria to learn There is no Police report # for the Extortion investigation brought on by Randy Sengel commonwealth's attorney which there is a letter from Ben DiMuro April 16, 2009 charging Plaintiff with acts of Extortion. Janice believes their to be obvious Collusion between Randy Sengel, Ben DiMuro to assist Lawyer Ilona in intimidation of Janice.
- Judge Bruce Lee's Secretary lies to Janice

 December 20, 2011 Ms. Slaughter Federal
- heard in Federal Court January 6, 2012 denied as Judge Lee is out of town?
- December 22, 2011 File in the Supreme Court of Virginia Petition for Writ of Error Coram Vobis Alexandria Court Illegal Actions to Deny Citizen Right to Trial by Jury and Grand Jury
- January 4, 2012 Letter Randy Sengel Commonwealth Attorney to <u>Judge Potter informing him to refuse Janice in front of the Grand Jury as</u>

 Janice is not one of his witness's
- Janice contacts Supreme Court regarding letter and informed anyone can write to a Judge from
- Meghan S. Roberts threatening Janice with legal action over \$200. For infractions of code a gutter & RV parked in my driveway. Collusion with Randy Sengel in attempt to Scare Janice and try to distract and cause more harm. Spring Street Gutters / RV Case # GV 12 3028 Question should be: How often does an attorney write a threatening letter over \$200. to a homeowner?
- 138. January 4, 2012 Letter from Meghan S. Roberts threatening Plaintiff with legal action over \$200. For infractions of code a gutter & RV parked in my driveway. Collusion with Randy Sengel in attempt to scare/intimidate Plaintiff.
- 139. Megan S. Roberts attorney for the City of Alexandria, abusive actions towards JWG are <u>RETRIBUTION</u> and <u>RETALIATORY ACTIONS</u> for JWG exposing corruption by several taxpayer paid employees of the Courts of the City of Alexandria. RETALIATORY actions are not legal. Megan S. Roberts in collusion with The actions of the City of Alexandria, Judges, Commonwealth Attorney,

Clerk of Court, VSB, JIRC, Courts of Justice, the Democratic party, Supreme Court of Virginia has acted intentionally, willfully, wantonly, and maliciously in their collusion to protect Ilona Ely Freedman Grenadier Heckman founding partner to the law firm Grenadier, Anderson, Stracae, Duffett & Kiesler, the late wife of Judge Albert Grenadier, from being held responsible for her and her law firms criminal activity.

140. A few days prior to Thanksgiving 2011 (right after receiving documents in the Mail from Judge Clark) a Code Inspector showed up at JWG home asking how she was coming with getting the gutter re-attached and the RV moved. JWG explained her financial difficulties and that she would in the next few weeks have the RV moved and the gutter fixed. He informed her not to worry and call him when it was completed. That with a moratorium on City workers working on Saturday – The Saturday after Thanksgiving they come back to the home and add additional fees.

These "fines" came after JWG contacted the Virginia Supreme Court after being blocked from exercising her RIGHT to speak to the Regular Grand Jury, blocked by both the Presiding Chief Judge Donald M. Haddock of the City of Alexandria Circuit Court, and by the City of Alexandria Commonwealth Attorney Randy Sengel.

141. That the actions of Megan S. Roberts coincide with the actions of other Government employees (Judges, Commonwealth Attorney Randy Sengel, Clerk of Court Ed Semonian, etc.) to maliciously intimidate JWG, this is just one of the many scare tactics they are using, to try and scare JWG from following through with suits

against other Government employees and complaints against them with other state agencies.

- January 7, 2012 Letter Janice to Meghan S.Roberts that Janice has no intention of paying and reason why
- January 18, 2012 Motion for sanctions against Randy Sengel commonwealth attorney for letter to Judge Potter ignored
- January 18, 2012 Pracipe to be heard on January 25, 2012
- January 20, **2012** Letter from Law Clerk Circuit Court of Alexandria that my Motion for Sanctions against Mr. Sengel would be heard by Judge Potter
- 146. February 2012 Filed:

Motion filed to demand Ed Semonian Clerk of Court answer simple questions about Grand Jury - Since Alexandria has shown in the past not to follow the rules of the courts It was reasonable for Janice to ask basic questions which he refused to answer. Most likely he doesn't know the basic rule

Parecipe filed on Feb 1 for Motion to be heard on February 8, 2012 by the new Judge - Judge Clark who had not recused himself from hearing this case.

- 148. February 2, 2012 Letter Circuit Court of Alexandria Motion Sanctions against Ed Semonian to be heard at 9am February 13, 2012
- Janice in court room 4 from the Grand Jury Final Order by Judge Richard Potter Denied in front of the Grand Jury he and Randy Sengel Commonwealth Attorney are now the Gate Keepers of the Grand Jury Treason of our Constitution by Judge Richard Potter and Randy Sengel
- 150. On or around March 9, 2012 Rick @ Neal R. Gross & Co., Inc informs Janice she can't get access to transcripts without permission from Clerk of Court Lucy S. Janice then has to Fax Neal R Gross copy of Appeal.
- 151. City of Alexandria in collusion to intimidate Janice, files suit against Janice again to take focus off the issue of the criminal actions of Ilona an attorney.
- 152. On the morning of May 14, 2012 JWG delivers letter to Ms. Roberts she is on the list to be sued with other Government employee's and lawyers that have prevented JWG from due process her United States Constitutional Rights, her Virginia State Constitutional and her Civil Rights.
- 153. May 14, 2012 Ms. Roberts has the Code Enforcement Lawmaster do a statement and in turn files suit against JWG. Mailing out a letter with the suit documents saying Janice had not responded to the \$450. the City ALLEGES the JWG owed. JWG never received a letter from Ms. Roberts in regard to the \$450.00. Ms. Roberts' actions in November and May are abusive and RETALIATORY against Janice for her exposing Alexandria Corruption to Virginia's Chief Justice. Janice filed a Counterclaim and Cross-Complaint. Which was denied by Judge from Arlington who lied in court? Just one more day of "Kangaroo Court" to try and intimated Janice.
- 154. On or around **September 26, 2012** Ilona and Ilona's attorneys show Orders by a Judge that did not have Jurisdiction and this can be proven by attorneys own affidavits that show more phone calls to Judges chambers than to clients. This is Michael Weiser and John Tran. Lawyer Ilona and Ilona's attorneys once again wish to cover up the truth and mislead the courts.

- 155. October 2012 Janice's documents submitted into the record are mailed back to her by Judge's Kemler, Dawkins and Clark. The box about 4" thick has been x-rayed and shows the documents but, never opened
- In the December / January time frame of 2012 & 2013 Lawyer Ilona in collusion with others as a favor or hired a gentleman that goes by the name of Mark Stuart who informs Janice he was to drug JWG and get sexual inappropriate pictures of JWG or to rape one of JWGs daughters or to plant drugs on JWGs daughter or in home to give Circuit Court Judges information to make Janice incompetent to file any other documents. Mr. Stuart said the Lawyer Ilona will go to any length to harm JWG or JWGs daughters. That Lawyer Ilona will continue to do what she can to distract Janice from becoming successful and moving on with Janices life. That Lawyer Ilona is greedy. That all Lawyer Ilona's actions are deliberate to cause harm to JWG. When the Alexandria Police were called they informed JWG they were instructed by Commonwealth Attorney Randy Sengel to not take any reports of issue.
- 157. On or around May 16, 2013 Janice requested a car that she had purchased and was in the name of Janices daughter returned or the right to pick it up. Lawyer Ilona in collusion with David Grenadier tried to intimidate and dare Janice to report them to the police for by all appearance forging documents with the DMV to get a title and sell the car.
- On or around July 16, 2013 Lawyer Ilona in collusion with Andrea and Robin/Racheal
 Grenadier the day after Defendants father dies again attacks Defendant in e-mails which re-enforces
 the hate of Catholics that Ilona her and family have. Lawyer Ilona again trying to distract from
 Lawyer Ilona's criminal actions. This is most likely in regard to the fact that the law by an attorney was
 pointed out to Janice that she owns 24.5% of all properties GIC has as funds were co-mingled and
 Lawyer Ilona used an attorney not licensed in Virginia for the Liquidation Agreement and JWG never
 signed off.
- On or around **July 12, 2013** after learning of the conflicts and disingenuous behavior of Lawyer Ilona in Janice's Forced Bankruptcy. Defendant revisited all the evidence and filed to re-open her Divorce as no property settlement had been done. That Ilona an attorney had written one that was not signed that was only a benefit to Lawyer Ilona. As an attorney Ilona acted again willfully to protect herself and for personal financial gain.

160. The law leaves little question that Fraud in procuring a settlement agreement can justify setting aside the agreement and judgment. Which there was none. *E.g.*, *In re Marriage of Modnick*, 33 Cal. 3d 897, 191 Cal. Rptr. 629 (1983); *Compton v. Compton*, 101 Idaho 328, 612 P.2d 1175 (1980); *Anderson v. Anderson*, 399 N.E.2d 391 (Ind. Ct. App. 1979); *Daffin v. Daffin*, 567 S.W.2d 672 (Mo. 1978).

Fraud in procuring a settlement can also be the basis for an independent tort action. Hall v. Hall, 455 So. 2d 813 (Ala. 1984); In re Benge, 151 Ariz. 219, 726 P.2d 1088 (Ct. App. 1986); Dale v. Dale, 66 Cal. App. 4th 1172, 78 Cal. Rptr. 2d 513 (1998); Den v. Den, 222 A.2d 647 (D.C. 1966); Oehme v. Oehme, 10 Kan. App. 2d 73, 691 P.2d 1325 (1984); Burris v. Burris, 904 S.W.2d 564 (Mo. 1995); Carney v. Wohl, 785 S.W.2d 630 (Mo. Ct. App. 1990); Hess v. Hess, 397 Pa. Super. 395, 580 A.2d 357 (1990). See also Vickery v. Vickery, 1996 WL 255755 (Tex. Ct. App., December 5, 1996) (wife awarded \$9 million against husband for fraudulently procuring divorce and marital settlement agreement, and \$450,000 against husband's attorney), affirmed over dissent in light of Schleuter v. Schleuter, 975 S.W.2d 584 (Tex. 1998), Vickery v. Vickery, 999 S.W.2d 342 (Tex. 1999). See generally, Robert G. Spector, Marital Torts: The Current Legal Landscape, 33 Fam. L. Q. 745, 757 (1999); Cary L. Cheifetz, The Future of Matrimonial Torts: The Unmapped Landscape, 15 Fair\$hare 4 (August 1995). The courts are especially harsh with spouses that commit fraud who are attorneys. Anderson v. Anderson, 399 N.E.2d 391 (Ind. Ct. App. 1979); Scholler v. Scholler, 10 Ohio St. 2d 98, 462 N.E.2d 158 (1984); Webb v. Webb, 16 Va. App. 486, 431 S.E.2d 55 (1993).

Lawyer Ilona in all actions has made herself a party to this divorce Thus, where a spouse and another person act in concert for the common purpose of defrauding the other spouse, an action for conspiracy will lie.

Conspiracy was also accepted in *Dale v. Dale*, 66 Cal. App. 4th 1172, 78 Cal. Rptr. 2d 513 (1998), where the wife sued for breach of fiduciary duty, fraud, constructive fraud, intentional and negligent misrepresentation, conversion, conspiracy, fraudulent conveyance, constructive trust, and declaratory relief. In this case, the wife claimed that after the husband was served with divorce papers, he and his bookkeeper withhold from billing patients, withheld monies received as payments to the accounts receivable, falsified ledgers, financial statements, and income tax returns, and otherwise acted in concert to artificially reduce the value of the husband's medical practice. The California appellate court upheld the wife's claims. *Accord Liles v. Liles*, 289 Ark. 159, 711 S.W.2d 447 (1986) (wife awarded damages for husband's attorney's fraud and misrepresentation in wife's suit to set aside property settlement agreement); *Carney v. Wohl*, 785 S.W.2d 630 (Mo. Ct. App. 1990) (upholding wife's claim of fraudulent misrepresentation against husband and husband's father); *Vickery v. Vickery*, 1996 WL 255755 (Tex. Ct. App., December 5, 1996) (wife awarded \$9 million against husband for

fraudulently procuring divorce and marital settlement agreement, and \$450,000 against husband's attorney), affirmed over dissent, Vickery v. Vickery, 999 S.W.2d 342 (Tex. 1999).

Another possible avenue for recovery against a spouse and a third party for economic fraud is the Racketeer Influenced and Corrupt Organizations Act (RICO), 18 U.S.C. §§ 1961-64 (Supp. 1999). Claims under RICO in the divorce context are also scarce, but not unheard of.

The strongest RICO case is *Perlberger v. Perlberger*, 1998 WL 76310, 1998.EPA.1313 (E.D. Pa. February 24, 1998). In this case, a woman filed a civil RICO claim against her ex-husband, his law practice associates, and his accountants for allegedly participating in a fraudulent scheme to conceal his true income during the divorce action. According to the wife, the fraudulent scheme began in 1986 when the husband decided to divorce the wife. He devised a scheme whereby he would initiate an extra-marital affair for the purpose of shielding his assets and income from scrutiny during divorce. The husband, an attorney, began an affair with a client, and purchased a home in her name. He then left his law firm and instead of using his own assets (a capital account the former firm owed him), he used his girlfriend's assets to establish a credit line for a new firm. He was then able to argue that his new firm was not a marital asset. He also paid his girlfriend an inflated salary, and had another attorney, Rothenberg, hold all the assets to the new firm. The court stated:

Here, Plaintiff's RICO claim is based on Defendants' alleged mail and wire fraud. Although the alleged fraudulent scheme perpetrated by the Defendants may be accurately described as "garden variety" fraud, such a characterization is not fatal to Plaintiff's RICO claim under the current state of the law.

Defendants next argue that they have not found any cases in Pennsylvania in which civil RICO has been used to attack a divorce decree, child support order, or alimony award. (Accountant Defs.' Mot. at 3.) Although the Court also has not found any such Pennsylvania cases, the Court has found a number of Federal cases where courts have entertained civil RICO claims relating to family law matters. E.g., Grimmett v. Brown, 75 F.3d 506 (9th Cir. 1996); Calcasieu Marine Nat. Bank v. Grant, 943 F.2d 1453 (5th Cir. 1991). With Tabas as guidance and with the decisions of other courts in mind, the Court will not dismiss Plaintiff's RICO claim on policy grounds.

Perlberger represents a small but growing handful of cases where a spouse asserts civil RICO in the divorce context. See Smith v. Johnson, 173 F.3d 430 (6th Cir. 1999) (unpublished table decision); DeMauro v. DeMauro, 115 F.3d 94 (1st Cir. 1997); Grimmett v. Brown, 75 F.3d 506 (9th Cir. 1996); Calcasieu Marine National Bank v. Grant, 943 F.2d 1453 (5th Cir. 1991); Evans v. Dale, 896 F.2d 975 (5th Cir. 1990); DuBroff v. DuBroff, 833 F.2d 557 (5th Cir. 1987); Dibbs v. Gonsalves, 921 F. Supp. 44 (D.P.R. 1996); Reynolds v. Condon, 908 F. Supp. 1494

(N.D. Iowa 1995); Streck v. Peters, 855 F. Supp. 1156 (D. Haw. 1994); Hibbard v. Benjamin, No. 90-1-361-WF, 1992 WL 300838 (D. Mass. Sept. 21, 1992); Capasso v. Cigna Insurance Co., 765 F. Supp. 839 (S.D.N.Y. 1991).

- On or around September 4, 2013 Lawyer Ilona filed a Motion to Intervene into Janice's divorce 163. again for willful acts that were and malicious, violent, oppressive, fraudulent, wanton, or grossly reckless for personal protection from the illegal actions to date of Lawyer Ilona.
- On or around September 11, 2013 Janice responds to Lawyer Ilona's Motion to Intervene. 164.
- The Divorce is never given an open hearing in the open court instead Judge Clark rules 165. from Chambers as all Federal Judge's have. That the appeal was denied and the Supreme Court denied extra time for a response as I was jailed and unable to respond.
- That Les Pendens were filed on the Real Estate still owned to protect Janice's interest as Ilona 166. had sold off many parcels illegally.
- On or around December 24, 2013 Lawyer Ilona and Loretta Miller aka (Leah Lax Miller, 167. Muggy Cat and Billy Sullivan) in collusion attack Janice for being Catholic. The following is just one of many e-mails and a blog jwgrenadierisalair.blogspot.com (by all appearance taken down while JWG was illegally jailed) which is riddled with lies - again to harm Janice and Janice's children and distract Janice and all from the TURTH. - Again when Police are called they are not to take any reports – I should just ignore the threats on me and my children.

From: LeahLax1234@aol.com <LeahLax1234@aol.com> To jwgrenadier@gmail.com

Tue, Dec 24, 2013 at 2:05 PM

want to hear something more scarier I contacted Ilona Ely Freedman Grenadier Heckman your witch hunt is over

From: LeahLax1234 & aol.com _{+|}To: jwgrenadier@gmail.com

Tue, Dec 24, 2013

YOU KNOW What YOU DIDN"T HELP JEWS YOU ARE THE KIND THAT WOULD TURN THEM IN BECAUSE ONE PERSON DID SOMETHING TO YOU THAT WAS JEWISH, YOU MADE YOUR BED AND YOU LIED IN IT. THIS FAMILY REJECTED YOU FOR NOT BEING JEWISH. YOU STUPID GOY YOU WERE REJECTED... GET THAT INTO YOUR THICK SKULL, NOW YOU ARE MAKING UP STORIES AND SPREADING

LIESI BLAMING ALL JEWS LIKE HITLER FOR NOT LIVING ON EASY

STREET, WELL GET OFF YOUR ASS. GOOD YOU LOST ALL YOUR MONEY MAKES YOU HUMBLE AND GOOD YOU GOT A WHIPPING FROM A JEWISH LAWYER WHO WAS SMARTER THEN YOURS GOOD FOR HER I WOULD HIRE HER IN A HEART BEAT. SHE WENT AFTER A JEW HATING NAZI AND SHE WON, AND I HOPE SHE GAVE HER GRANDSONA GOOD TALKING TO FOR MARRYING A GOY IN THE FIRST PLACE AND HE SHOULD HAVE KEPT HIS ZIPPER UP AND NOT HAVE HAD SEX WITH A MENTALLY SICK PIECE OF CRAP LIKE YOU.

YOUARE THE NAZI WORSE A MUSLIN LOVING NAZI! YOU HATE YOURSELF THAT IS WHY YOU HATE JEWS YOU ARE BLOCKEDI.

A page out of Divorce Lawyers Ilona's gang has done:

Now here is something really funny and intersting about Janice Wolk Grenadier. Well actually a few funny things. Today she was seen naked in her back yard building an ice alter to her Dark Lord Satan. She was doing this in the freezing rain. The scary part was she had icicles hanging from her oversized nipples and from her pubic hair. She then took a large icicle and began to masterbate with it until it melted.

A neighbor had seen Janice Wolk Grenadier walking out of a sex shop Friday night with a large bag filled with sex toys and two very large women who looked like Amazons. They were seen driving to a gay bar in which Janice and the two women frequent and have pajama parties afterwards. She left Saturday morning with her hair disarray and a smile on her face. A dog collar could be seen around her neck and welts on her arms and legs. We don't think she is the dominant one in this relationship. Family services should have taken her kids away from her years ago. She neglected them for her sexual pleasures and alcohol addiction.

Janice Wolk Grenadier adores her Fuher Adolf Hitler who was also bi-sexual. Janice Wolk Grenadier has been seen wearing a painted on mustache just like her idol and walking around wearing a Swasticka on her rare selfic

of Janice Wolk Grenadier

This classless woman should be put away in a padded cell so she can't hurt anyone else. Someone please call the authorities to have her institutionalized for her safety and for the safety of others. Remember she carries a gun!

Sunday, January 5, 2014

Janice Wolk Grenadier supports the Anti Christs Obama and Hillary Clinton

Not only is Janice Wolk Grenadier a traitor to the American people by being a card carrying Commie Pinko but she is also supporting the Anti Christs Obama and Hillary Clinton. Yes we said it here, Anti Christs meaning plural. Why is Janice doing this? Because they are not only going to let her keep her hairy vag but they are going to give her the chance to grow a penis as well. Well penises. Yes, Janice Wolk Grenadier will have 6 penises all over her body including one over her vagina. The other 5 will be as so: one in the palm of each hand, one on the bootom of each foot and one right where a tramp stamp would be on her back. That way when Janice Wolk Grenadier dies, she can go to Allah's heaven and have her 72 virgins. These 72 virgins will be a mix of males and females that she can rape with all of her penises and then the next morning at sun up they become virgins again. We have figured it out that the fetal body of little Joshua that Janice keeps in the basement of her home is going to be the vessel for the Dark Lord Satan himself to resurrect in a human body to carry out the apocolypse. That way, Janie Wolk Grenadier is guaranteed her 6 penises.

Proof she supports the Anti Christ is in her letters she has posted and her other posts of Hillary's and Obama's support defending both on everything Loretta Lax Miller fought against including the ObamaCare and Islamic Terrorism which Obama and Hillary support. Janice is for the destruction of the Catholic Church's values of having Nuns despense birthcontroll pills. Janice supports this by supporting Hillary Rodham Clinton and Barack Husein Obama. Everything Obama stands for is to destroy American Family Values and Janice has no values and worships Satan.

We at Muggy Cat take the religious stand that Janice is the Anti Christ and does not beleive in God and the wonders God has done on this Earth. Maybe Janice should move to sin city Las Vegas and sell her soul as well as her fugly body on the strip since she is whoring for Satan.

----Original Message----

From: JWG <jwgrenadier3@aol.com>

To: muggycatscreams < muggycatscreams@aol.com>; leahlax1234 < leahlax1234@aol.com>

Sent: Wed, Jan 1, 2014 10:45 am Subject: Re: i agree with you

You FUCKEN JEWS!!!!! ALL OF YOU . DICK FADDEL JOSH COHEN LEALL AV AVA LODETTA LAX MILLER AND THE REST OF YOU FUCK SHOULD BE PLACED IN A BIG OVEN.

This e-mail as many were fabricated by Divorce Lawyer Ilona and her many gang members / Defendants who have libel and Slander'ed Janice

for favor

Warmly, JW Grenadier

We hope that you join us on Friday, January 10th, 2014 outside of Janice Wolk Grenadier's house to protest her anti-American pro-Satan values. Email us at muggycatscreams@aol.com for Janice Wolk Grenadier's address. We are expecting at least 200 people so don't forget to bring Holy Water from your church to purify and sactify the land of the supporter of the Anti Christ and the mother of the vessel of Satan. We will have a prayer session to pray for her lack of soul but do not look her straight in the eyes or you will be turned to stone.

Posted by muggy cat at 8:48 AM

Email ThisBlogThis!Share to TwitterShare to Facebook Labels: CIA, FBI, Hillary Rodman Clinton, Janice Wolk Grenadier, KGB, leah lax, MI5, MI6, My Pillow Pack, Obama, virginia law 2010

That the above is just 1 pages out of almost 200 printed out pages of slander and Libel of Janice by Plaintiffs. Janice felt the e-mails that bear her name THAT JANICE DID NOT WRITE should hold a lot of wait in what Janice will be able to prove.

165 A. That Janice requested an an injunction would not substantially injure other interested parties and This blog has hurt no one but Janice and her ability to market and advertise a Child Friendly product. This blog and other actions were deliberate willful acts that are and were malicious, violent, oppressive, fraudulent, wanton, or grossly reckless. That the hacking and killing of Janice's computers was malicious and has also prevented Janice the right to market her product.

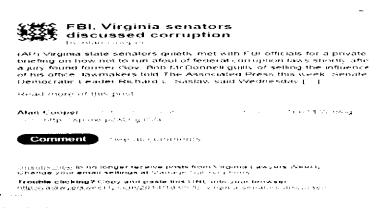
- 165B. That the public interest would be furthered by the injunction the HATE CRIME OF THIS is sinful and that this court cannot see that becomes questionable to the rational of fairness. That the sexual and in appropriate photos of Hillary Clinton and Michele Obama in there blogs - The racist and religious overtures of HATE BY DEFENDENTS is so obvious that to have to go any further would show Bias by this court and any one of normal moral value. . "Fairness of course requires an absence of actual bias in the trial of cases. But our system of law has always endeavored to prevent even the probability of unfairness. "In re Murchinson, 349 U.S. 133, 136 (1955)" Loving v. Virginia, 388 U.S. 1 (1967) was a landmark civil rights decision of the United States Supreme Court against discrimination. Which includes being discriminated because the Judge's, lawyers, elected officials and government employees have decided you are not a part of or one of them.
- That in December of 2015 a new blog which is still on the web along with continuing e-mails making the 168. harassment the slander and libel a continuing occurrence by Ilona Grenadier Heckman and her gang the blog is janicewolkgrenadierinjail.blogspot.com That Janice viewed it as recently as November 11, 2015 – where Ilona and her gang is calling Janice a Terrorist.

- The false and illegal legal fees fined against me so Ilona and the Old Boys Network could further harm me, by attorneys who have lied in court, lied in court documents, lied to the Supreme Court of Virginia, ex-parte communications, City of Alexandria Police Report: ignoring the law with the help of the Commonwealths attorney's office took the report
- 170. That Lawyer Ilona filed Case's in The City of Alexandria and Prince William County to have the Lis Pendens removed using Ben DiMuro and Andrea Mosley both that would continue to lie in court and in court documents to mislead the courts from the "TRUTH" using their influence on the Judge's to illegally threaten jail as shown in the Orders from both Judges and to illegally jail me for legal fees by Judge Clark.
- 171. Divorce Lis Pendens Case # 1400 2193 Just a miscarriage of further Justice where the Affidavit of Legal fees has more calls to Judge's chambers than to their own client. Illegal ex-parte communications.
- Judge to record the court hearing. The sheriffs on the end of the tape can be heard saying to erase it. None of the Judges who heard this case allowed witness's to speak nor did they have Jurisdiction due to Bias all Orders were and are "VOID" even with the Judgments the lawyers were given Legal Collection agencies have refused to enforce when they have seen the evidence of corruption.
- 173. A police report with the help of the Commonwealths attorney was done: and tampered with to prevent "DUE PROCESS" Police Report in the City of Alexandria by JW Grenadier October 10, 2014

 Notes Case No. 14 142420
- 174. On Friday October 10, 2014 Janice Wolk Grenadier went to the court house to file a motion to have a court appointed attorney.
- 175. Janice went to the court house to file my Motion for an emergency hearing The Clerk politely explained I needed to call Judge's chambers to set it up. I am actually by their Order of October 12, 2014 forbidden to call Judges Chambers, write to Judges Chambers etc. This is just one case where they are allowing outrages legal fees and trying to put me in jail no on October 22, 2014.
- 176. I went to the Commonwealths attorney's office which even though they are attorneys they don't look into anything that does not come to them though the police. I have called the police several times to report the corruption and the man they had hired to harm me, along with the Leah Lax bullying. The police would come to my house and say well we aren't allowed to write a report. That Randy Sengel Commonwealth Attorney had

ordered no one was to write a report on my complaints. So I called the police right there at the Court House and had them come there and take the report.

- 177. Officer M, Vaccaro #2371 and P. Taylor #1979 his supervisor / training officer was with him. The crime was headlined as "Criminal Corruption in the Courthouse is what you are claiming" me "YES" this report was taken in the Clerk's office. I gave them the pictures of my evidence that was stolen out of my file and the Order that came with it, The attached documents and since my files were in the court house right there I asked if they would like to go through them. They were not interested in doing that. Replied "This will be turned over the to the White Collar Crime division, that this was above their job" the Case No is 14 142420
- 178. After the report they wanted me out of the Court House, They said that I did not have to leave but, it was best for me. They insinuated I had done something to be removed that the Commonwealth Attorney's office did not want me in the building. When I asked why and what was said they refused real comment and admitted I had done nothing wrong.
- The Commonwealth attorney's office has said several times they would not put me in front of the Grand Jury to ask for a Special Grand Jury that I had to go through the Police as is in my attached documents about the Corruption in Northern Virginia- yet it has always been the Commonwealth Attorney who blocked me from a police report in regard to the corruption.
- 180. I gave them copies of documents showing criminal intend for the officers to open the case. The document with the Box of Evidence and the Order from Judge Clark, Kemler & Dawkins is modified by the Notes that were filed in my Statement of Facts in November of 2012



Virginia is being closely watched by the FBI

or that is the appearance -

Other Links:

<u>Virginia Rated 47th and 49th in Corruption - Daily Beast rated Virginia second most Corrupt State - http://www.loudountimes.com/index.php/news/article/region survey finds virginia second most corrupt state987/</u>

State Integrity Gave them an F - 47th most corrupt States - http://www.stateintegrity.org/virginia

- 181. The FOIA request was completely redacted by the City Attorneys This was in collusion with the Commonwealth's Attorney whose suggestion it was to call the police.
- 182. That a **Judge with Jurisdiction has never been had in this case**. All Judge's were improperly chosen with or by Judge Haddock
- Jailing me on the pretense of legal fees that Alps Insurance said they were paying, for lawyers who had lied in almost if not all documents submitted to the court, the affidavit of legal fees showing more calls to Judge's chambers than to their own clients. Most importantly we do not have debtors prisons in the United States of America Janice was jailed illegaly on October 22, 2014 After sneaking out documents was released early on November 14, 2015 Janice stated the Following:

That your actions have turned back time. Giving me less rights then a slave. Taking someone under Title 42 US Code 1994 and Title 18 US Code 1581(a): Whoever holds or returns any person to a condition of PEONAGE, shall be fined under this title for imprisoned not more than 20 years or both. That on October 22, 2014 I was placed in jail for failure to pay legal fees in 30 days which is a violation of my Thirteenth Amendment "Neither Slavery not involuntary servitude, except as punishment for a crime where of the party shall have duly convicted, shall exist within the United States, or any subject to their Jurisdiction". Furthermore the right by placing me "under" a state Peonage / Involuntary Servitude violating the Fourth Amendment right by malicious prosecution, false imprisonment and unconstitutional arrest. This violation of my Eight Amendment Right as to Excessive Bail which in this case constitutes "Restitution Bail" which further shows the knowledgeable malicious intent to silence me till the election was over on November 4th. 2014. Bias, Retaliation and Retribution to further line the Lawyers pockets by Judge Clark.

184. JAILING AND USING WARFARE TYPE TOUTURE October 22 – Nov 12, 2015

■ 14 days Solitaire Confinement – till around 5pm on election day which is Torture

What is Solitary Confinement? In the early nineteenth century, the U.S. led the world in a new practice of imprisoning people in solitary cells, without access to any human contact or stimulation, as a method of rehabilitation. The results were disastrous, as prisoners suffered severe psychological harm. The practice was all but abandoned. Over a century later, it has made an unfortunate comeback. Instead of torturing prisoners with solitary confinement in dark and dirty underground holes, prisoners are now subjected to solitary confinement in well-lit, sterile boxes. The psychological repercussions are similar

CCR's Challenges to Solitary Confinement In May 2012, the <u>Center for Constitutional Rights (CCR)</u> filed a lawsuit against the state of California for its use of prolonged solitary confinement in the infamous Pelican Bay prison. Ashker, et al. v. Governor, et al., is a federal class action challenging prolonged solitary confinement and deprivation of due process, based on the rights guaranteed under the Eighth and Fourteenth Amendments, at Pelican Bay In Wilkinson v. Austin, the U.S. Supreme Court unanimously ruled in support of CCR's claims that prison officials cannot confine prisoners in long-term solitary confinement in a super maximum prison without first giving them the opportunity to challenge their placement.

Solitary Confinement is Torture The devastating psychological and physical effects of prolonged solitary confinement are well documented by social scientists: prolonged solitary confinement causes prisoners significant mental harm and places them at grave risk of even more devastating future psychological harm and at times, these harms were found to be permanent or persist even after one was released from solitary. Researchers have demonstrated that prolonged solitary confinement causes a persistent and heightened state of anxiety and nervousness, headaches, insomnia, lethargy or chronic tiredness, nightmares, heart palpitations, fear of impending nervous breakdowns and higher rates of hypertension and early morbidity. Other documented effects include obsessive ruminations, confused thought processes, an oversensitivity to stimuli, irrational anger, social withdrawal, hallucinations, violent fantasies, emotional flatness, mood swings, chronic depression, feelings of overall deterioration, as well as suicidal ideation.

Exposure to such life-shattering conditions clearly constitutes cruel and unusual punishment — in violation of the Eighth Amendment to the U.S. Constitution. Further, the brutal use of solitary has been condemned as torture by the international community. Juan Mendez, the United Nations Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment, concluded that even 15 days in solitary confinement constitutes torture or cruel, inhuman or degrading treatment or punishment, and 15 days is the limit after which irreversible harmful psychological effects can occur. Other independent human rights bodies at the UN have also expressed concern about Pelican Bay prison and the overall use of solitary in U.S. prisons. However, many prisoners in the United States have been isolated for far longer than just 15 days — I was only a few hours short of 15 days

- Denied phone calls till 10 pm on 1st day
- Woken up every 2 hours at night
- Not allowed out of cell till 2 or 3 am for one hour, left in cell for over 24 hours limit.
- When tried to make phone calls the calls through system did not work and could not get help
- Sat down and told I had less rights than someone who murdered someone by City employee
 Jonathan Teumer and Lt Rea for sneaking out the documents that got me out of jail early. The actions were deliberate and evil to intimidate me further. That Mayor Euille was given such documents as well as all other State officials
- Denied access to Priest and when I did see him and asked for my cross or rosary He explained he had been told by Lt. Rea it would have to be if she deemed it appropriate for me to have. He did not understand or had never seen such a situation where it went through a Sheriff like Lt. Rea. This action was pure evil.
- No Advocate
- Denied mail returned to sender saying I was not there my mail I did received had been opened
 I requested a copy of the court order and was denied
- Denied phone calls to lawyers
- Stripped searched patted down men watching me shower
- I was lied to consistently by the Sheriffs especially Lt Rea and Capt. Williams
- Moved around to try and disorient me and show control they had
- The Magistrate when finally I was allowed in front of him warned me "If I did not stop this it would only get worse for me? Which I took as a personal threat on my life and on my children's lives Which I took as a personal threat on my life and on my children's lives Especially with the knowledge of at least 5 known hits in the City of Alexandria and the Supreme Court Justice Cynthia Kinser being forced to retire early Gift to the Democrats letting Fund Raiser

Michael Gardner out of jail – who had by DNA results found guilty of molesting young girls in McLean – only to turn around and try to hire one of those hit men to kill the girls – Do it the Virginia Way as Senator Mark Warner would say in his Campaign

- Denied appropriate forms for filing of complaints and requests
- All Avery v. Johnson rights denied
- Denied my documents on my day of court, prior to going to court.
- Judge Clark in Court stated "Ms. Grenadier I have no choice but to release you " and then turned to Lawyer Michael Weiser and stated "I am sooooo very sorry I can not collect your legal fees for you you will need to do a judgment against her for collection" As Lawyer Ben DiMuro et al were no shows after lying in court, lying in court documents et al.
- The head Sheriff assured me I would be released within 2 hours of getting back to the jail I was not released till after 8 pm over 8 hours from getting back from the Court. The apparent reason was to further try to intimidate me and further the mental anguish of false imprisonment and to try and enforce the EVIL POWER they believe they have in controlling a single mom who told the "TRUTH", and did not spinelessly walk away from the Old Boys Network.
- 185. That the Plaintiffs Orders they claim to be judgments are "VOID" that not one Judge from September of 2007 or before have had Jurisdiction and ruled by the law. That Janice a poor person has been denied even her basic rights to Due Process. That the collusion and the harm that the Plaintiffs have caused was done willfully with knowledgably intend to harm Janice and her girls for being Catholic and no longer party to the Old Boys Network as she was told many occasions and listed here in this Counter Complaint Cross Complaint. That the State and Federal law, the Professional Code of Ethics is very clear on Judicial Misconduct and when a Judge Does Not have Jurisdiction, that is Treason on the Courts, Fraud on the Courts what the Judges have done since on or around September of 2007.

V. CHARGING ALLEGATIONS: CIVIL RIGHTS COUNT 1 JANICE ILLEGAL JAILING AND TORTURE 42 .SC. § 1983, § 1994 18 USC 1581(a) Violating 4th and 8th Amendment

- 186. This Count and each Claim herein assert deprivations of constitutional rights under color of law pursuant to 42 U.SC. § 1983 against Defendants as indicated per Claim.
- 187. Each act alleged in this and each Count of this First Amended Complaint was performed under color of law.
- 188. That all Defendants are aware of Janice's illegal jailing and have acted under the color of law to ignore and to further cover it up to help make Plaintiff homeless and to further the criminal acts with new law suits for ill-gotten legal fees awarded by VA, Judges Wiermer and Clark for favor with Dimuro, and the Old Boys Network.

- Taking someone under Title 42 US Code 1994 and Title 18 US Code 1581(a): Whoever holds or returns any person to a condition of PEONAGE, shall be fined under this title for imprisoned not more than 20 years or both. That on October 22, 2014 I was placed in jail for failure to pay legal fees in 30 days which is a violation of my Thirteenth Amendment "Neither Slavery not involuntary servitude, except as punishment for a crime where of the party shall have duly convicted, shall exist within the United States, or any subject to their Jurisdiction". Furthermore the right by placing me "under" a state Peonage / Involuntary Servitude violating the Fourth Amendment right by malicious prosecution, false imprisonment and unconstitutional arrest. This violation of my Eight Amendment Right as to Excessive Bail which in this case constitutes "Restitution Bail" which further shows the knowledgeable malicious intent to silence me till the election was over on November 4th. 2014. Bias, Retaliation and Retribution to further line the Lawyers pockets by Judge Clark.
- 190. That Judge Clark had to release Janice Early after she snuck out documents stating to the other attorneys "I am so sorry I can not collect your legal fees"

Claim 1.1 42 U.S.C. § 1983

- 190. This is a Claim by Janice against Defendants for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983
- 191. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 192. That the COA Police by not following up on the harm that was threatened by Michael Stuart by all appearance hired or as favor to Clark, Grenadier, DiMuro, Wieser, Ilona, David et al to harm Janice and her girls
- 193. That the COA / VA sheriffs in warfare torture waking Janice up at night for sleep deprivation, moving Janice around to disorient, the Magistrate threatening the safety of her daughters while she was in jail, the extra patting down when moving about was to intimidate further.
- 194. In performing the acts attributed to them, used, threatened, and attempted to use unreasonable and excessive mental harassment upon Janice despite Janice's lack of physical resistance, in deprivation of Janice's liberty interest to be free from excessive, unreasonable, or unnecessary force under the Fourth, Fifth, and Fourteenth Amendments to the Constitution of the United States ("EXCESSIVE FORCE and HARRASSMENT"). That in Jail documents, papers, and effects against unreasonable search and seizure under the Fourth and Fourteenth Amendments to the Constitution of the United States, ("SEARCH AND SEIZURE").
- 195. Upon seizing Janice, Defendants at no time advised Janice of any other crime then \$8,100.00 in legal fees for lawyers that had lied in court, lied in court documents of any crime she was accused of committing in deprivation of his right to be notified of all charges against her secured by the Fifth, Sixth, and Fourteenth Amendments of the Constitution of the United States ("PROCEDURAL DUE PROCES").
- 196, . In so acting, Defendants intended and did deprive, retaliate for, oppress, and chill Janice's PUBLIC BENEFIT ACTIVITIES, rights to freedom of speech, expression, privacy, and association, secured by the First, Fifth, and Fourteenth Amendments to the Constitution of the United States and ("EXPRESSION, PRIVACY, and ASSOCIATION");

- 197. In so acting, Defendants did deprive, interfere with, impede, hinder, delay, and oppress Janice's past, ongoing, and future of DUE ADMINISTRATION OF JUSTICE secured by the First, Fifth, and Fourteenth Amendments to the Constitution of the United States ("ACCESS TO JUSTICE");
- 198. In so acting, Defendants were aware of Janice's standing up and speaking out as an advocate for each of the EQUAL PROTECTION CLASSES and acted intending to deprive Janice of her rights as a such in violation to his rights to the equal protection of the laws secured by the Fifth and Fourteenth Amendments to the Constitution of the United States ("EQUAL PROTECTION");
- 198.. In inflicting this Janice's jail time was abusively, violently, and in front of professional in the court at the time of arrest. Defendants injured and assaulted, and intentionally, oppressively, and maliciously humiliated, embarrassed, and defamed Janice as detailed more fully elsewhere, constituting a deprivation of Janice's right not to be subjected to cruel and unusual punishment for being poor and of a conceived lower class by the Defendants under the Fifth, Eighth, and Fourteenth Amendments to the Constitution of the United States ("CRUEL AND/OR UNUSUSAL PUNISHMENT").
- 199.. In so acting, Defendants CULPABLY and UNREASONABLY breached one or more PROFESSIONAL DUTIES, causing foreseeable injury to Janice in deprivation of Janice's right to not be deprived of life, liberty, or property without due process of law secured by the Fifth and Fourteenth Amendments to the Constitution of the United States ("SUBSTANTIVE DUE PROCESS").
- 200. Defendants performed the acts attributed to them in agreement and coordination with one or more other Defendants as elsewhere detailed.
- 201. As an actual and foreseeable result, Janice has been deprived of state and federal constitutional rights, damaged, and injured in a nature and amount to be proven at trial.

Claim 1.2 42 U.S.C. § 1983

- 202. This is a Claim by Janice against Defendants deprivation of rights under color of law pursuant to 42 U.S.C. § 1983
- 202. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 204. . COA Jail has several unknown deputies of the COA Sheriff's Department employed by Defendant COA / VA, working at all times relevant to this Count under the direct and indirect supervision, policies, power, and control of Defendants Clark, COA, VA, and as the agents of each judicial officer acted illegally in the jailing and torture of Janice. That several of the unknown agents of the Sheriffs used indirect supervision, direction, power, and control of Janice for the Defendant's to further harass and permanently damage Janice.
- 205. On information and belief, supervisors (Lt. Lea and Capt. Williams) with other higher ranking Sheriff's Deputies with the direct ability and power to control, direct, and supervise acts attributed to harm Janice.
- 206. On information and belief, COA Sheriff had the power and ability as deputized peace officers to prevent or aid in preventing each illegal act of their co-Defendants Illegally Jailing Janice. Defendants alleged herein to be a violation of any law, including violation of Plaintiffs' rights, privileges, and immunities under the Constitution of the United States and the Constitution of the State of Virginia..
 207. In performing the actions in the Jailing of Janice and this Count 1, Defendants are CULPABLY and UNREASONABLY breached one or more PROFESSIONAL DUTIES, causing reasonably foreseeable constitutional deprivation to Janice in violation of Janice's rights to SUBSTANTIVE DUE PROCESS.

208, In performing the actions in the Janice jailing and this Count 1, Defendants subjected or caused to be subjected Janice to deprivation of rights, privileges, and immunities relating to SEARCH AND SEIZURE; SUBSTANTIVE, DUE PROCESS; PROCEDURAL DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE; EXCESSIVE FORCE; and CRUEL AND/OR UNUSUSAL PUNISHMENT.

Claim 1.3 42 U.S.C. § 1983

This is against the State of Virginia and the United States of America for the actions of Judge Donald Haddock, Judge Lisa Kemler, Judge Nolan Dawkins, Judge Thomas Fortkort, Judge J. Howe Brown, Judge James J. McGrath, Judge Richard Bowen Potter, Chief Judge Mary Grace O'Biren, Judge Carroll A. Weimer Jr., Judge Richard J. McCue, Judge Donald Kent, Judge James E. Boasberg, Judge Judge Beryl A. Howell, Judge Reggie Walton, Judge Ricard Leon, Judge Gerald Lee, Judge Rudolph Contreras, Judge Leona Brinkema

- 209. This is a Claim by Janice against VA and USA for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983
- 210. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 211. The above Judges were at relevant times a Judge of the USDC District of Columbia, USDC Eastern Division of Virginia or Circuit Court Judges in the State of Virginia.an employee of Defendant's USA or VA a coordinator in the Janice Jailing, and an agent of USA or VA.
- 212. On information and belief, in performing the acts attributed to them in the Janice jailing, the above Judges acted as a supervisor, director, and principal of Defendants USA or VA. Each Janice jailing COORDINATOR, in their activities elsewhere described.
- 213. On information and belief, Defendant's collaborated with USA and or VA COURT, to plain and participate in the Janice jailing. ("PLANNING AND DELIVERY"), with extra notices to confirm Janice would be in court.
- 214. In performing the actions in the Janice Jailing and the USA and VA are CULPABLY and UNREASONABLY breached one or more PROFESSIONAL DUTIES, causing reasonably foreseeable constitutional deprivation to Janice in violation of Janice's rights to SUBSTANTIVE DUE PROCESS.
- 215. In committing the actions as alleged in the Janice Jailing the USA and VA, in collaboration and agreement with each other including lawyers Wieser, DiMuro, Grenadier Janice Jailing COORDINATOR's, subjected Janice or caused her to be subjected to deprivation of rights, privileges, and immunities relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; PROCEDURAL DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE; EXCESSIVE FORCE; and CRUEL AND/OR UNUSUSAL PUNISHMENT.
- 216. As an actual and foresecable result, PLAINITFF has been deprived, damaged, and injured as elsewhere alleged for life.

Claim 1.4 42 U.S.C. § 1983

Against VA - Judges McGrath, Fortkort, Brown McGrath, Dawkins, Kemler and Haddock

217. This is a Claim by Janice Jailing against Defendants VA Judge McGrath, Fortkort, Brown, McGrath, Dawkins, Kemler and Haddock for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983 218. All prior paragraphs are re-alleged and incorporated as if set forth in full.

- 219. Defendants at all times relevant to this Count and Claim was, are or were a Judge of the state of Virginia and worked in collusion to coordinate between September of 2007 and January of 2012 to prevent Due Process and coordinated in Ex-parte communications to protect one of there own Divorce Lawyer Ilona Grenadier Heckman.
- 220. On information and belief, Defendants McGrath, Fortkort, Brown, McGrath, Dawkins, Kemler and Haddock were a collaborator with DiMuro, Wieser and Grenadier, Ilona and possibly other Janice Jail COORDINATORS in the PLANNING AND DELIVERY,
- 221. The above in there Bias Orders, allowing Lawyers to Lie in court, Lie in Court documents in performing the actions in the Jailing of Janice and this Count 1, They are CULPABLY and UNREASONABLY breached one or more PROFESSIONAL DUTIES, causing reasonably foreseeable constitutional deprivation to Janice in violation of Janice's rights to SUBSTANTIVE DUE PROCESS. 222. In performing the actions described in this Count 1 with each other Defendants as alleged, subjected Janice or caused Janice to be subjected to deprivation of rights, privileges, and immunities relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE; EXCESSIVE FORCE; CRUEL AND/OR UNUSUSAL PUNISHMENT. When the Judges and Lawyers Self Policing did not in any way stop or correct their errors they committed Fraud on the court. Violating That all "ORDERS ARE VOID" Due to the Judges lack of Jurisdiction. VA Code 17.105 (b) and VA Code § 8.01-428. Setting aside default judgments; clerical mistakes; independent actions to relieve party from judgment or proceedings; grounds and time limitations.
- A. Default judgments and decrees pro confesso; summary procedure. Upon motion of the plaintiff or judgment debtor and after reasonable notice to the opposite party, his attorney of record or other agent, the court may set aside a judgment by default or a decree pro confesso upon the following grounds: (i) fraud on the court, (ii) a void judgment, (iii) on proof of an accord and satisfaction, or (iv) on proof that the defendant was, at the time of service of process or entry of judgment, a person in the military service of the United States for purposes of 50 U.S.C. app. § 502. Such motion on the ground of fraud on the court shall be made within two years from the date of the judgment or decr
- 223. As an actual and foresceable result, PLAINITFFS have been deprived, damaged, and injured as elsewhere alleged.

Claim 1.5 42 U.S.C. § 1983

Against Defendants USA Judges Boasberg, Howell, Walton, Leon, Lee and Contreras, Ginsburg, Rogers, Srinivasan and Brinkema, Doe

- 224. This is a Claim by Janice against Defendant USA. For deprivation of rights under color of law pursuant to 42 U.S.C. § 1983
- 227. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 228. USA Judges at all times relevant to this Count had the ability to stop the Jailing of Janice if they had followed the law and allowed her equal access to the courts.
- 229. On information and belief, Janice was denied equal access due to being poor and the personal relationships the above Judges had with other Defendants working and religious. These Judges collaborator the other Defendants to coordinate the Jailing of Janice.
- 230. On information and belief, these Judges met with one or more other Defendants to

- COORDINATOR the cover up of the criminal acts and actions of the other Defendants and especially Divorce Lawyer Ilona Ely Grenadier Heckman who hates Catholics.
- 231. On information and belief, Defendants communicated with others who COORDINATED THE Jailing of Janice.
- 234. In performing the actions in the Orders or lack of Orders allowing Due Process and this Count 1, the above Judges are CULPABLY and UNREASONABLY breached one or more PROFESSIONAL DUTIES, causing reasonably foreseeable constitutional deprivation to Janice in violation of Janice's rights to SUBSTANTIVE DUE PROCESS.
- 235. In performing the actions described in this Count 1 with each other Defendants caused Janice to be subjected to deprivation of rights, privileges, and immunities relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE; EXCESSIVE FORCE; CRUEL AND/OR UNUSUSAL PUNISHMENT.
- 236. As an actual and foreseeable result, PLAINITFFS have been deprived, damaged, and injured as elsewhere alleged.

Claim 1.6 42 U.S.C. § 1983

Against Defendants GRENADIER LAW, WIESER, REED, RICH, BWW, TROUTMAN, PARKER, KELLER, VSB, DIMURO and Ilona, Gurvitch

- 237. This is a Claim by Janice against the above Defendants AND ASSOCIATES for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983.
- 238. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 239. Above defendant at all times relevant to this Count 1 was a practicing attorney and notorious member of the "Old Boys Network" in Virginia.in conjunction with the USA and VA COURT's, employee, owner, and agent of Defendants different law firms were a ware of and help to coordinate the Cover up of Ilona and Grenadier Law.
- 240. On information and belief, the above met with one or more Janice Jailing COORDINATORS.
- 241. On information and belief, the above communicated with other Janice Jailing COORDINATORS., Discussing Plaintiffs' PUBLIC BENEFIT ACTIVITIES, DUE ADMINISTRATION OF JUSTICE, and her participation in exposing the Corruption in the Judiciary, the Government and Elected Officials. The members of the Old Boys Network have commented to the effect of "that's why we have to do what we do." Meaning Jailing Janice to Silence her or through warfare torture have her commit Suicide. The Old Boys Network cannot afford more Murder for Hire.
- 248. In performing the actions in the Janice Jailing and this Count 1, the above Lawyers and associates of the firms are CULPABLY and UNREASONABLY breached one or more PROFESSIONAL DUTIES, causing reasonably foreseeable constitutional deprivation to Janice in violation of Janice's rights to SUBSTANTIVE DUE PROCESS.
- 249. In performing the actions described in this Count 1 with each other Defendants as alleged, the above subjected Janice or caused Janice to be subjected to deprivation of rights, privileges, and immunities relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE; EXCESSIVE FORCE; CRUEL AND/OR UNUSUSAL PUNISHMENT.
- 250. As an actual and foreseeable result, PLAINITFFS have been deprived, damaged, and injured as elsewhere alleged.

Claim 1.7

Retaliation

42 U.S.C. § 1983 Against all Defendants

- 251. This is a Claim by Janice against all Defendants for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983 by efforts to retaliate against Plaintiffs for telling the "TRUTH" supposedly your best defense. COMPLAINT I and the DUE ADMINISTRATION OF JUSTICE in the Janice Jailing 252. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 254. On information and belief, upon a meeting with Judge Giammittorio it is believed the Scheme to deny due process and to allow the "TURTH" of the criminal acts of Ilona, Erika and David and all other Defendants was going to be denied in any type of Open Court room.
- 260. In performing the actions described in this Count 1 with each other Defendants as alleged, subjected Janice or caused her to be subjected to deprivation of rights, privileges, and immunities relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; EXPRESSION, PRIVACY, ACCESS TO JUSTICE; EXCESSIVE FORCE; CRUEL AND/OR UNUSUSAL PUNISHMENT.
- 261. As an actual and foreseeable result, PLAINITFFS have been deprived, damaged, and injured as elsewhere alleged.

Claim 1.8 Retaliation

42 U.S.C. § 1983 By Judge Donald Kent and his x-wife Martha Kent

- 262. This is a Claim by Janice against Defendants VA, VSB for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983
- 263. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 264. On information and belief, February of 2011 after many phone calls starting on around November 3, 2008 with assistant to Patsy Ticer a meeting is had –even though I live walking distance in Alexandria to have meeting I had to go down to Richmond which she was still toooo busy to meet with me and set me up with an older women who claimed ot be her assistant I would find out later that was a "LIE" Instead: set me up with **Martha Kent x-wife of Judge Kent**. I will not be spineless like Martha Kent and Patsy Ticer and allow a bunch of overgrown "BULLIES" to control me as they have them. After listening to my story she said to me:
 - "Do you know who I am?" no
 - "I am the x wife of Judge Donald Kent" Martha Kent
 - "I have walked in your shoes you can't win this"
 - "Me and My family can't get a fair trial either"
 - " You are no longer one of them"

Defendants VA, COA and VSB have ignored this and all other allegations determined to retaliate against Janice for her involvement with exposing the TRUTH.

272. In performing the actions described in this Count 1 with each other Defendants as alleged, Defendants subjected Janice or caused her to be subjected to deprivation of rights, privileges, and immunities relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE; EXCESSIVE FORCE; CRUEL AND/OR UNUSUSAL PUNISHMENT.

273. As an actual and foreseeable result, PLAINITFFS have been deprived, damaged, and injured as elsewhere alleged.

Claim 1.9 42 U.S.C. § 1983 Against Defendant USA, VA, COA

- 274. This is Claim by Janice against Senator Mark Warner and Patsy Ticer for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983 for planning, supervising and implementing the Janice Jailing and acts of others in violation of PLAINTIFS' rights, privileges and immunities.
- 275. Senator Mark Warner "elected by the residents of the State of Virginia. By all news reports and reporting of his own self that he offered a Judgeship to the daughter October 11, 2014 Breaking news Senator Mark Warner and aid to Governor Terry McAuliffe guilty and admit to offering a Federal Judgeship to daughter of Phil Puckett on or around October 14, 2014 Janice exposes on Blog VaLaw2010.blogspot.com information of corruption by Senator Warner.
- 276. On or around October 22, 2014 November 12, 2014 22 days Janice illegally jailed and tortured in the City of Alexandria, Solitaire Confinement till 5pm on Election day Tuesday, November 4, 2014. Illegally Jailed to: 1. Silence her and stop exposure of e-mails between herself and Mark Warner's office on the corruption in the Judiciary. Janice went to Mark Warner for help instead he had her jailed, at the same time it was exposed his "Pay to Play" with a Federal Judgeship for a favor. Being ignored by the Senate Ethics Committee. Janice out of retaliation was held in Solitaire Confinement till 5 pm on Election day by Defendants. 2. To Bully / scare her into either committing Suicide or to turning the other check of the corruption and not holding Virginia and the Federal Judiciary, the Government and Elected Officials accountable, as well as the criminal acts and actions of the Old Boys Network in Virginia The State of Virginia is sued for his individual and official capacities.
- 278. On information and belief, Senator Mark Warner in a close race was aware of such speech and political activities, and acted at all times herein with the intent to retaliate, deprive, interfere with, and oppress such activities in deprivation of Janice and Janice's rights to SPEECH, ASSOCIATION, and PRIVACY; ACCESS TO JUSTICE; and SUBSTANTIVE DUE PROCESS.
- 281. On information and belief, at all times mentioned in this Complaint VA has been aware of his co-defendants' acts relating to Janice and the DUE ADMINISTRATION OF JUSTICE, and Plaintiffs' PUBLIC BENEFIT ACTIVITIES.
- 283. In performing these actions, VA is CULPABLY and UNREASONABLY breached one or more PROFESSIONAL DUTIES, causing reasonably foreseeable constitutional deprivation to Janice in violation of Janice's rights to SUBSTANTIVE DUE PROCESS.
- 284. In performing the actions described in this Count 1 with each other Defendants as alleged, VA / Senator Mark Warner subjected Janice or caused her to be subjected to deprivation of rights, privileges, and immunities relating to SEARCH AND SEIZURE; PROCEDURAL DUE PROCESS; SUBSTANTIVE DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE; EXCESSIVE FORCE; CRUEL AND/OR UNUSUSAL PUNISHMENT.
- 285. As an actual and foreseeable result, PLAINITFFS have been deprived, damaged, and injured as elsewhere alleged.

Claim 1.10 42 U.S.C. § 1983 Chilling

- 300. This a Claim by Janice against Defendants, its associates, members and affiliates, and Janice, for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983 for planning and participating in the illegal Jailing of Janice in violation of PLAINTIFS' rights, privileges and immunities, causing "chill" of existing and further protected activity.
- 301. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 302. Defendants were aware of the Criminal Acts of Divorce Lawyer Ilona Grenadier Heckman
- 303. Defendants disfavored Janice from PUBLIC BENEFIT ACTIVITIES; Plaintiffs' "JUDGES
- BEHAVING BADLY" MESSAGE, the DUE ADMINISTRATION OF JUSTICE, and Plaintiffs' ongoing..
- 304. Defendants' organized and committed the Jailing of Janice to deprive, intimidate, thwart, retaliate for, and chill the same ("CHILL").
- 305. Plaintiffs and others at or aware of the Janice Jailing were CHILLED; frightened, intimidated, demoralized, thwarted, and emotionally traumatized by Defendants' activities.
- 306. As an actual and foreseeable result, Janice, and affiliates have since been deterred, intimidated, deprived, or abandoned further PUBLIC BENEFIT ACTIVITY, and DUE ADMINISTRAITON OF JUSTICE, dissembled, disassociated, avoided interactions with one another.
- 307. Janice's clients, professional colleagues, and affiliates at or aware of the Janice Jailing who previously had high opinions of Janice and provided or referred PLAINTIFS significant business opportunities, stopped associating with, providing or referring such opportunities out of fear of reprisal by Defendants.
- 308. In performing the actions described in this Count and the Janice Assault, Jailing the COORDINATORS and each of them, in CULPABLE and UNREASONABLE breach of one or more PROFESSIONAL DUTIES, have subjected Janice her affiliates, or caused them to deprivation of their rights, privileges, and immunities relating to SUBSTANTIVE DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; and ACCESS TO JUSTICE.
- 309. As an actual and foreseeable result of the acts of each Defendant to this Count 1, Janice affiliates, have been deprived, damaged, and injured in their persons and property in a manner and amount to be proven at trial.

COUNT 2 Virginia State Law Claims

This is a Count against Defendants consisting of supplemental Claims under Virginia state law and a single Claim under 42 U.S.C. § 1983 based thereon.

Claim 2.1

Breach of Contract, Covenant of Good Faith and Fair Dealing

- 314. This is a Claim by Janice for breach of contract and covenant of good faith and fair dealing under Virginia state law and 42 U.S.C. § 1983
- 315. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 316. In committing the Janice Jailing Defendant UNREASONABLY and CULPABLY deprived Janice of her rights under the CONTRACT without cause, notice, justification, or abatement, thereby breaching the contract.
- 317. Based on Defendant COA, VA participation in the Janice Jailing ENTERPRISES, and other CULPABLE acts alleged herein, its acts in breach of contract were in bad faith, malicious, fraudulent, and oppressive, in breach of the covenant of good faith and fair dealing.

318. As an actual and foresecable result, Janice has been damaged or injured in a nature and amount to be proven at trial.

Claim 2.2

Wrongful Inducement to Breach Contract, Covenant of Good Faith and Fair Dealing Against Janice Jailing COORDINATOR Defendants

- 319. This is a Claim by Janice for wrongful inducement to breach contract, breach of covenant of good faith and fair dealing, wrongful interference with prospective contractual relations, and defamation against all Janice COORDINATOR Defendants under Virginia State law and 42 U.S.C. § 1983
- 320. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 321. Defendants and each of them were aware of the rights to Real Property stolen by Divorce Lawyer Ilona Grenadier under VA CONTRACT law and the covenant of good faith and fair dealing attendant thereto, prior to the Janice Jailing and ASSAULT, and by their UNREASONABLE and CULPABLE actions in breach of one or more PROFESSIONAL DUTIES expected and intended their actions to cause the breach thereof.
- 322. As an actual and foreseeable result, USA, VA and COA did UNREASONABLY and CULPABLY breach the Janice CONTRACT and covenant of good faith and fair dealing attendant thereto, causing Janice damages and injuries in a nature and amount to be proven at trial.

Claim 2.4

Interference with Economic Relations Against Janice Jailing COORDINATOR Defendants

- 323. This is a Claim by Janice for wrongful interference with existing and prospective economic relations, and defamation against Janice. 42 U.S.C. § 1983
- 324. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 325. Janice Jailers and COORDINATOR Defendants knew or should have known of Plaintiffs' PUBLIC BENEFIT ACTIVITIES and Janice's profession and POSITION UNDER THE UNITED STATES, and the existing and potential economic relations as an Entrepreneur.
- 325. Janice's ASSAULT COORDINATOR Defendants knew or should have known that committing each act's as the blog jwgrenadierisalair.blogspot.com in the Janice's ASSAULT would wrongfully interfere with such relations. That in December of 2015 a new blog which is still on the web along with continuing e-mails making the harassment the slander and libel a continuing occurrence by Ilona Grenadier Heckman and her gang the blog is janicewolkgrenadierinjail.blogspot.com That Janice viewed it as recently as November 11, 2015 where Ilona and her gang is calling Janice a Terrorist.
- 326. Defendants knew or should have known that causing or contributing to the Janice Jailing would damage Janice, and cause resulting business income loss for My Pillow Pack,
- 327. In performing the acts ascribed to them in the Janice Jailing and Count 1, Defendants to this Count 2 actually and proximately caused Janice to suffer lost business opportunities, revenue, and goodwill in a nature and amount to be proven at trial.
- 328. Defendants knew or should have known that causing or contributing to the Janice Jailing would damage Janice, and cause resulting injury and loss to Janice and her business ventures. Which defendants where aware of with the help of the Ilona Gang and the Blogs calling Janice a Homosexual and Aniti Christ forging e-mails et al were criminal libel and discriminatory towards Janice.

- 329. In performing the acts as described to them in the Janice Jail and Count1, Defendants to this Count 2 actually and proximately caused PLAINITFFS to suffer lost business opportunities, revenue, and goodwill in a nature and amount to be proven at trial.
- 330. As an actual and foreseeable result, Plaintiffs have been deprived, damaged and injured in a nature and amount to be proven at trial.

Claim 2.5 Defamation, Libel and Slander

- 331. This is Claim by Janice against all DEFENDANTS by virtue of the defamatory and extreme and outrageous nature of their conduct, causing severe mental distress and constitutional deprivation thereby.
- 332. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 333. In performing the acts ascribed to them in the Janice Jailing and each Claim of Counts 1 and 2, Defendants, and each of them, knew or should have known that Janice was an entrepreneur maintaining of business, personal, and professional relationships in the City of Alexandria since April of 1983..
- 334. Defendants further knew or should have known that the acts of assaulting, and statements insulting, accusing, and humiliating Janice as described above in front of millions by way of the web of her professional colleagues, clients, and judges would defame and injure her reputation, cause her severe emotional distress, loss of business opportunities, and resulting loss of income, and jeopardize Janice and her girls lives.
- 335. In light of said knowledge and other facts alleged herein, each Defendant's actions in each Claim of Count 1 and the Janice Jailing defamed and injured Janice's reputation for life.
- 336. All statements and acts causing such injury to Janice were false, misleading, and unjustified.
- 337. As an actual and foreseeable result, Janice has been damaged and injured in a nature and amount to be proven at trial.

Claim 2.6 Intentional Infliction of Emotional Distress

- 338. This is Count by Janice against all DEFENDANT's for injury by virtue of the defamatory and extreme and outrageous nature of their conduct, causing severe mental distress and constitutional deprivation thereby.
- 339. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 340. In performing each acts ascribed to them in the Janice's Jialing the Blogs, the Threats on her life and her girls life's and well being and each Claim of Count 1, each Defendant intended to cause, or acted in reckless disregard of the likelihood of causing and did cause Janice extreme emotional distress.
- 341. As an actual and foreseeable result of the Janice Jailing the Gang like harassment by Judges, Lawyers, the City of Alexandria, and the State of Virginia as well as Federal Judiciary and each Defendant's actions in each Claim of Count 1, Janice has in fact suffered severe emotional distress and resulting loss to business opportunities and income.

Claim 2.7 42 U.S.C. § 1983

Inducement to Breach Contract, Covenant of Good Faith and Fair Dealing

- 342. This is a Claim by Janice against Defendants / COORDINATOR's for deprivation of SUBSTATNIVE DUE PROCESS by virtue of each prior Claim in this Count pursuant to 42 U.S.C. § 1983 343. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 344. Defendants and each of them were aware of Plaintiffs and their affiliates, PLAITNIFFFS' PUBLIC BENEFFIT ACTIVIES and the Patent pending for My Pillow Pack..
- 345. Defendants, and each of them, CULPABLY planned, coordinated, communicated, and cooperated with each other to induce and affect the Janice Jailing and torture ASSAULT knowing and intending the same to be a breach of the CONTRACT and covenants thereto.
- 346. In committing each act alleged in each Claim of this Count, each Defendant intended and expected to further the purposes of each ENTERPRISE which the Defendant is affiliated with, including all "racketeering activity" of those ENTERPRISES as that term is defined in 18 U.S.C. § 1961(1). As such, each act alleged in each Claim herein constitutes an act "involving" the predicate crimes of kidnapping, robbery, bribery, and extortion alleged in Racketeering Counts.
- 347. In committing each act as described in this Count, Janice Jailing COORDINATOR Defendants deprived PLAINITFF of rights relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; EXCESSIVE FORCE; and CRUEL AND/OR UNUSUSAL PUNISHMENT.
- 348. As an actual and foreseeable result of the Janice Jailing / Blogs / Threats on her life and each Defendant's actions in each Claim of Count 1, Janice has in fact suffered severe emotional distress and resulting loss to business opportunities and income.

COUNT 3 Malicious Prosecution, Obstruction of Justice 42 U.S.C. § 1983

- 349. This is a Count by Janice against all Defendants, including and not limited to other John and Jane Doe 's not listed as Defendants in the Janice Jailing ASSAULT COORDINATORS for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983. This Count sets forth a series of related crimes of abuse of color of law authority and legal process to impose duress, undue influence, retaliation, and oppression on Plaintiff and her girls. These acts include obstruction of justice, malicious prosecution, perjury, prosecutorial misconduct, kidnapping, and extortion under state and federal law, and form the factual basis of PLAITNIFFS' Claims to several Racketeering Counts, and tolling by duress, fraud, and undue influence.
- 350. The General Allegations to this Count identify both immune and non-immune acts. The Claims of this Count are based only on the non-immune acts. Other acts are relevant to legal issues not relevant to the claims of this Count such as racketeering activity, fraud, duress and undue influence, to which immunity is not a defense.
- 351. For all actions relevant to this Count, all Defendants and each of them, acted under color of law to interfere with, deter, deprive, and retaliate for Plaintiffs' exercise of rights, privileges, and immunities under the Constitution of the United States and the Constitution of the State of Virginia.
- 352. In performing each act attributed to them in this Count, CITY ATTORNEY DEFENDANTS COA were bound under the following PROFESSIONAL DUTIES: CONSTITUTIONAL (non-discretionary), and REASONABLE CARE.

GENERAL ALLEGATIONS TO COUNT 3
The COA, VA and USA Claim and Demand

- 353. Shortly after a meeting with the COA Mayor, COA Police, and the COA attorney Janice, e-mailed and mailed a letter to the Attorney General, the Governor of Virginia and e-mailed the remainder a Demand letter as requested. Such letter has been ignored. Demanding compensation for the injuries Janice suffered in the Cover up of the Criminal Acts of Divorce Lawyer Ilona Grenadier Heckman the Defendants and at the hands of the Sheriffs in jail. (the "CLAIM AND DEMAND").
- 354. The CLAIM AND DEMAND outlined facts consistent with those set forth in this Complaint..
- 355. Janice received either no answer or an answer they felt they had no liability to Janice.
- 357. Defendants' records will reflect that e-mail or ignoring gives the appearance of summarily denied liability for the Janice's Jailing et al with no specific explanation. That no defense was given as to legally right to do to Janice what has been done.
- 368. Recognizing the scope of the dispute, the number of questionable Suicides that surround the Old Boys Network, along with MURDER FOR HIRE Janice is afraid for her and her girl's lives. That the Defendants are and have became intimidated and frightened Janice by there actions, and statements. Considered to be a very real threat to his personal security.
- 371. On information and belief, by Police, Judges and other lawyers also aware of Plaintiffs' PUBLIC BENEFIT ACTIVITIES and DUE ADMINISTRATION OF JUSTICE, including the Jailing COORDINATOR Defendants' hostility to such activity Defendants and their representatives therefore acted in conspiracy and ENTERPRISE to protect Defendants own interests, the interests of its insured's and their affiliates to oppress and impede the CLAIM AND DEMAND, and impose further HARASSMENT and ABUSE of Plaintiff.
- 372. In doing so, USA, VA and COA imposed duress, intimidation, fear, and oppression which did in fact cause Janice to cease pursuing the CLAIM AND DEMAND, the DUE ADMINISTRATION OF JUSTICE, and initiation of this Action.

Prosecutorial Misconduct of Assistant City Attorney City of Alexandria Megan Roberts, George McAndrews, James L. Banks Jr, Corine Parks Paralegal, Ms. Gerry and Ms Christia Brown, Commonwealth Attorney's office

- 373. On about October 10, 2014 , on information and belief, The City Attorneys and the Commonwealth Attorney interfered in Police Report on the corruption in the COA Courts.
- 374. That prior to this the City of Alexandria Attorneys to harass Janice filed suit over gutters and an RV in her drive way legally parked. That the use of COA employees to intimidate and to harass Janice has been an on going criminal act.
- 375. Janice has now endured years in persecution as a result of such outrageous behavior. Janice appears today to redress those acts for herself and, she prays, thousands of others who have suffered similar and even more outrageous insults, violations, deprivations, and injuries under the indecency of those who today occupy offices of honor, yet who regularly debase those offices while driven by motives no one, perhaps not even they themselves, could honor.
- 376. Such behavior was intended to retaliate, obstruct, and deprive Janice of rights, privileges and immunities under state and federal Constitutions. Janice subsequent arrest, imprisonment, injury, and severe mental distress constitute numerous serious felonies under state and federal law, as detailed through out this Complaint.

- 377. COA Police, the FBI and others acts in investigating, manipulating evidence, witnesses, and the Virginia and Federal Judiciary / Courts and initiating the prosecution of Janice for exposing the criminal acts of the Judiciary, the Government and Elected Official matter constitute CULPABLE and UNREASONABLE breach of one or more PROFESSIONAL DUTIES, and have foreseeably resulted in deprivations of Janice's clearly-established rights under the First Amendment to the Constitution of the United States. Such acts are not immune from criminal accountability, and those on which the Claims of this Count are based, are not immune from civil.
- 378. These acts of the Defendants will be referred to as Defendants PERJURY ONE.
- 379. That Janice will be able to show that all Lawyers in this suit have lied in Court, lied in Court documents to Cover up Criminal Acts of Divorce Lawyer Ilona Grenadier or the other Defendants.
 379 That PERJURY TWO was to interfere with and retaliate for Plaintiffs' PUBLIC BENEFIT

ACTIVITIES and the DUE ADMINISTRATION OF JUSTICE.

- 382. On information and belief, Defendants did so with the knowledge and support of, all of whom acted with the specific intent to retaliate against Janice for telling the "TRUTH" and exposing the continuing criminal acts and actions of the Defendants. DEFENDANTS caused Janice to be imprisoned without probable cause causing a false imprisonment for 22 days. At the time Janice was imprisoned by Defendants the Judges and others knew or should have known of the perjuries and retaliatory nature of the Old Boys Network. (FALSE IMPRISONMENT 1).
- 385. Janice was jailed for being poor was the appearance but, it went much deeper which will be proven at trial.

Judicial Misconduct

- 387. On October 22, 2014 Judge James Clark bias to protecting his friends. Having been asked several times to recuse himself refused. That even today as this is being written the Defendants have filed a new suit with a new Scheme to further forever harm Janice.
- 388. That the Judiciary in the Federal Government and the State of Virginia is a disaster. That in the past it has been mostly Blacks that they have had to deal with and could intimidate and be Disingenuous as no one was going to stand up for them. That in Virginia the Old Boys Network has intimidated and make it clear to lawyers that they will loose there license if they don't do as told. This is changing the new face of who the Federal Government, Virginia and these defendants are dealing with are white people. Who for there whole lives believed in a Freedoms we were taught we had. The Defendants have violated that trust and that freedom of Janice.
- 400. That the Defendant lawyers believe they can file anything they want and the Judge's to protect them and the Criminal acts of all involved will rule as the Lawyers who put them in position of being a Judge owe.
- 401. Such acts, though possibly immune from civil suit, constitute "monstrous" felony criminal violations of Janice's rights relating to SEARCH AND SEIZURE, PROCEDURAL and SUBSTANTIVE DUE PROCESS, and CRUEL AND/OR UNUSUAL PUNISHMENT.
- 414. On information and belief, Defendants collaborated, agreed, affiliated, and conspired, City Attorney and Defendants on Janice's Jailing ASSAULT COORDINATORS, and other ENTERPRISE PERSONS, including other Judges that are party to the Old Boys Network in Virginia.
- 445. 18 U.S.C. § 242 provides: Whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects any person in any State, Territory, Commonwealth, Possession, or District to the

deprivation of any rights, privileges, or immunities secured or protected by the Constitution or laws of the United States, or to different punishments, pains, or penalties, on account of such person being an alien, or by reason of his color, or race, than are prescribed for the punishment of citizens, shall be fined under this title or imprisoned not more than one year, or both; and if bodily injury results from the acts committed in violation of this section or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire, shall be fined under this title or imprisoned not more than ten years, or both. 446. The Criminal Activities to Cover up the Truth the numerous acts of punishment and prosecution of protected speech along with the perjury and subornation of perjury constitute deprivations of Janice's rights secured under the First, Fourth, Fifth, Eighth, and Fourteenth Amendments to the United States Constitution and related provisions of the Constitution of the State of Virginia. Whether shielded from civil accountability or otherwise, the felonies represent a deplorable pattern of contempt of law. They are also RICO predicate crimes under 18 U.S.C. § 1961(1)(A) and (B), as detailed below.

- 447. On information and belief, defendants sought to impose these deprivations knowing such to be criminal violations of Janice's constitutional rights in order to punish, retaliate, obstruct justice, and CHILL Janice from further criticism of the Judiciary, the Government and Elected Officials and all other Defendants herein, and to intimidate, harass, and oppress Janice from pursuing the CLAIM AND DEMAND, this Action, the DUE ADMINISTRATION OF JUSTICE, and PUBLIC BENEFIT ACTIVITIES.
- 448. That Judge Clark for the Love that Judge Haddock et al has for Ilona used jail as a conduit and device to impose fear, retaliation, intimidation, duress, undue influence to try and impede Janice bringing this Action, and further deprive her of rights privileges and immunities secured under the Constitutions of the United States and the State of Virginia.
- 452. Janice is and was and in fact remains intimidated, oppressed, fearful, and under duress from all defendants illegal activity.
- 453. Janice was imprisoned by Judge Clark for the other favor of the other defendant, who knew or should have known of the malicious and retaliatory nature of the prosecution until release on November 12, 2014. Such constitutes a false imprisonment for 22 full days (FALSE IMPRISONMENT).
- 454 Janice was imprisoned on October 22, 2014 with only DiMuro lawyers stating she had a home with a value of \$700,000. Which they were aware no equity existed possibly and the home was in foreclosure.
- 456. That due to the Gang like activity the Blogs they the Defendants had killed any hopes of Janice getting a job. That the malicious behavior by the Judiciary et al is to cover up the criminal acts and actions of themselves and there friends, the other defendants.
- 466. As an intended or a reasonably foreseeable result of these actions of Defendants, Janice has been reasonably fearful, intimidated, frightened, deceived, and thereby under duress and undue influence to exercise his rights to bring this Action sufficient to equitably extend or toll the running of any statute of limitations on all Claims. *Ateeq v. Najor*, 15 Cal. App. 4th 1351, 1356, 19 Cal. Rptr. 2d 320, 323 (1993); *Lauter v. Anoufrieva*, 642 F. Supp. 2d 1060, 1101 (C.D. Cal. 2009).
- **467.** The events in this Section shall collectively be referred to as the **MALICIOUS PROSECUTION**. The DEFENDANTS' role in them shall be referred to as the **PROSECUTORIAL MISCONDUCT**.

Claim 3.1 42 U.S.C. § 1983

- 468. This is a Claim by Janice against Defendants and it's unknown Claims representative, for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983 for its response to the CLAIM AND DEMAND, and its role in the CITY ATTORNEY DEFENDANTS' and Janice's COORDINATORS' response to the CLAIM AND DEMAND, foreseeably leading to the MALICIOUS PROSECUTION, PROSECUTORIAL MISCONDUCT, and FALSE IMPRISONMENTS.
- 469. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 470. At all times herein mentioned, VA Judges and Federal Judges, Commonwealth Attorney was acting as an agent or employee of USA, VA or COA and on information and belief each Janice ASSAULT COORDINATOR in all acts relating to the CLAIM AND DEMAND. In such capacity, VA, COA acted under color of law.
- 471. On information and belief, in responding to the CLAIM AND DEMAND, VA, COA collaborated with Janice's ASSAULT COORDINATORS and CITY ATTORNEY DEFENDANTS in the MALICIOUS PROSECUTION, and FALSE IMPRISONMENTS by providing or generating false or misleading information, testimony, documents and other evidence to other Defendants, precipitating acts in the MALICIOUS PROSECUTION, and foreseeably causing the FALSE IMPRISONMENTS and other subsequent events.
- 472. In committing the acts as described in this Count 2, VA, COA and Defendants UNREASONABLY breached one or more PROFESSIONAL DUTIES, including the duty of good faith and fair dealing available to Claimant beneficiaries of property and liability insurance policies written in Virginia, causing foreseeable constitutional deprivation to Janice in violation of Janice's rights to SUBSTANTIVE DUE PROCESS, and extreme mental distress.
- 473. In performing the actions in this Count 2, Defendants subjected Janice or caused her to be subjected to the PROSECUTORIAL MISCONDUCT, FALSE IMPRISONMENTS, and MALICIOUS PROSECUTION, constituting a deprivation of rights, privileges, and immunities relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; PROCEDURAL DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE; EXCESSIVE FORCE; and CRUEL AND/OR UNUSUSAL PUNISHMENT.
- 474. As an actual and foreseeable result, Janice has been deprived, damage, and injured in a nature and amount to be proven at trial.

Claim 3.5 42 U.S.C. § 1983 Chilling

- 498. This a Claim by Janice against all DEFENDANTS for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983 for all **nonimmune** acts of the MALICOUS PROSEUCITON, PROSECUTORIAL MISCONDUCT, and CLAIM AND DEMAND, in violation of PLAINTIFS' rights, privileges and immunities.
- 499. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 500. Each Defendant to this Claim was aware of the Criminal acts of Divorce Lawyer Ilona Grenadier Heckman and had an obligation to speak up. That Janice's PUBLIC BENEFIT ACTIVITIES, and ENGAGEMENT before each event in the MALICIOUS PROSECUTION and PROSECUTORIAL MISCONDUCT.
- 501. Defendants disfavored these Plaintiffs' PUBLIC BENEFIT ACTIVITIES; Plaintiffs' "JUDGES BEHAVING BADLY" MESSAGE, the DUE ADMINISTRATION OF JUSTICE, and Plaintiffs' ongoing.

- 502. Defendants' organized, committed, and participated in the Janice Jailing ASSAULT, MALICIOUS PROSECUTION, and response to the CLAIM AND DEMAND to deprive, intimidate, thwart, and retaliate for the same.
- 503. Plaintiff and others at or aware of the MALICIOUS PROSECUTION, PROSECUTORIAL MISCONDUCT were frightened, intimidated, demoralized, and emotionally traumatized by Defendants' activities.
- 504. By the MALICIOUS PROSECUTION, and PROSECUTORIAL MISCONDUCT, Defendants CHILLED Plaintiffs and their affiliates from further PUBLIC BENEFIT ACTIVITIES and other rights of SPEECH, ASSOCIATION, ACCESS TO JUSTICE, and SUBSTANTIVE DUE PROCESS.
- 505. As an actual and foreseeable result, Janice and affiliates have since been deterred, intimidated, deprived, or abandoned further PUBLIC BENEFIT ACTIVITY, DUE ADMINISTRATION OF JUSTICE, dissembled, disassociated, and avoided interactions with one another, causing Plaintiffs lost business opportunities and revenue.
- 507. In performing the actions described in this Count and the MALICIOUS PROSECUTION and PROSECUTORIAL MISCONDUCT, the Janice ASSAULT COORDINATORS and each of them, in CULPABLE and UNREASONABLE breach of one or more PROFESSIONAL DUTIES, have subjected Janice and affiliates, or caused them to be subjected to deprivation of their rights, privileges, and immunities relating to SUBSTANTIVE DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; and ACCESS TO JUSTICE.
- 508. As an actual and foreseeable result of the acts of each Defendant to this Claim, Janice and affiliates, have been CHILLED, deprived, damaged, and injured in their persons and property in a manner and amount to be proven at trial.

COUNT 4 Obstruction of Justice 42 U.S.C. § 1983

- 509. This is a Count against Defendants for obstruction of justice relating to events subsequent to the filing of this Action, constituting deprivations of rights under 42 U.S.C. § 1983
- 510. That since on or around March of 1990 Janice can and will show with documents the Obstruction of Justice by lawyers Defendants that through each law firm has a representative that has lied in court, lied in court documents, lied in documents to the Supreme Court of Virginia.
- 511. That the Judge's have been in all case chosen by Favoritism and Cronyism ie friend's of Defendant Ilona, Erika or David to rule in there favor ignoring the law in hopes that Plaintiff will commit suicide or one of their threats on her life will happen.
- 512. That Judge Haddock made it clear all Judges' would be chosen by him to protect Ilona from the Truth being exposed for the "LOVE" he has for her.
- 541. By virtue of the actions of Defendants, and each of them, detailed in the different Orders or documents that they were not going to allow the Truth to be exposed of the corruption in the Judiciary, the Government and with the Elected Officials. Defendants have deprived or caused deprivation to Janice of rights to SPEECH, PRIVACY, and ASSOCIATION; SEARCH AND SEIZURE; ACCESS TO JUSTICE; and SUBSTANTIVE DUE PROCESS, causing deprivation, damage, and injury in a nature and amount to be determined at trial.

COUNT 5 Obstruction of Justice, Deprivation of Rights Under Color of Law

42 U.S.C. § 1983

- 551. This is a Count against Defendants, for their *ultra vires* acts under color of law constituting deprivations of rights privileges and immunities under 42 U.S.C. § 1983. Defendants' acts and failures include creating and maintaining illegal policies, rules, and customs, causing and permitting a culture of deliberate indifference, failure to train, breach of PROFESSIONAL DUTIES, and failure to act in a special relationship, foreseeably causing constitutional deprivation as elsewhere alleged.
- 552. Defendant VA Commission on Judicial Performance, at times authorized to perform certain activities under the Commission, except in such times as he was acting *ultra vires*, beyond the scope of authority in his office, in CULPABLE and UNREASONABLE breach of one or more PROFESSIONAL DUTIES, in criminal and civil conspiracy, or in violation of Plaintiffs' rights under the Constitution of the State of Virginia.
- 554. The VSB In performing all acts attributed to them in this Count, have ignored the criminal acts of the lawyers by all appearance for the funding they receive from them. The VSB were bound under the following PROFESSIONAL DUTIES: CONSTITUTIONAL (non-discretionary), SUPERVISORIAL, FIDUCIARY, SPECIAL RELATIONSHIP, CREATION OF DANGER, SOCIAL WORKER and REASONABLE CARE. Said duties include duties to assure others within their power and control abide by their duties.
- 555. The VSB, FBI, DOJ and the JIRC authorized activities include investigating Plaintiff Janice's complaints to the Commission on Judicial Performance were ignored and she was told to not send any other complaints as they would be returned as these were.
- 557. VA, USA and COA functioned at all times under color of law and only in an administrative capacity. At no relevant time has either functioned to protect Janice..

Claim 5.1 Illegal Line-Drawing 42 U.S.C. § 1983

- 558. This is a Claim for deprivation of rights under color of law for USA, VA and VSB unauthorized rulemaking to permit illegal judicial conduct, causing foreseeable constitutional injury to Plaintiffs as elsewhere alleged.
- 559. All prior paragraphs are re-alleged and incorporated as if set forth in full.

Judge's "Line Drawing" Duties

- 560. USA, VA and VSB duties and responsibilities include "oversight, supervision, training, supervision, and discipline over judges of Virginia and Federal courts and the justices of the Court of Appeal and Supreme Court." Their duties and responsibilities also include the power and duty to discipline, control, or influence "former judges for conduct prior to retirement or resignation." They also "share authority with the superior courts for the oversight of court commissioners and referees."
- 561. That the USA, VA and COA "authority is limited to investigating allegations of judicial misconduct and, if warranted, imposing discipline." "Judicial misconduct usually involves conduct in conflict with the standards set forth in the Code of Judicial Ethics. After investigation and in some cases a public hearing, the commission may impose sanctions ranging from confidential discipline to removal from office."

- 562. Under such authority, the FBI, the Commonwealth Attorneys, the OAG have a role in creation, maintenance, and enforcement of rules governing the behavior of County judges, including judicial officer Defendants herein.
- 563. That the different Agency's in the USA, COA and VA have ignored the criminal acts and threats on Janice and her girls lives to protect one of there own. As such, these Defendants' rulemaking and enforcement influence gives them the power, though not the authority, to permit unconstitutional conduct by refraining from discipline of it, and to discipline judicial conduct which is not a violation of any law. Such power foreseeably influences judicial behavior toward litigants, including Plaintiff herein.
- 565. These "line-drawing" roles of COMMISSION employees are described in detail in the Judicial Cannons.
- 566. In addition to their PROFESSIONAL DUTIES, Defendants are bound by special duties in the performance of their job responsibilities in drawing lines. Those "line-drawing duties" include the duty to draw and only enforce lines which are consistent the mandates and restrictions which govern the behavior of those whom they have the power and ability to influence or control, including all provisions of the Construction of the United States and the Constitution of the State of Virginia.
- 567. Any CULPABLE or UNREASONABLE failure to draw lines consistent with the laws that govern judicial behavior constitutes a violation of Defendants PROFESSIONAL DUTIES. Such breaches causing reasonably foreseeable injury constitutes a deprivation of SUBSTANTIVE DUE PROCESS, and perhaps other deprivations, to the person or entity injured.
- 568. Relevant to this litigation, the laws under which the Defendants and others exercise line-drawing control include those identified in the Constitution of the United States, the Constitution of the State of Virginia, the Virginia Code of Judicial Ethics, Civil Rights Criminal and Civil Statutes, as well as those laws and rules identified as JUDICAL PROFESSIONAL DUTIES, CONSTITUTIONAL PROFESSIONAL DUTIES, and oaths of office of judicial officers.
- 569. Pursuant to their own PROFESSIONAL DUTIES under the Constitution of the State of Virginia Defendants have no discretion to draw lines inconsistent with these laws, rules, codes, oaths, and cannons governing judicial officials.
- 570. By their power and ability to draw lines, Defendants and other Commission employees exercise significant control over behavior of Judges in Virginia jurisdictions. Because many acts of judges are uniquely immunized or insulated from ordinary civil accountability, Defendants, and other Commission employees represent the only true influence to enforce—or fail to enforce—laws and duties governing judicial behavior.
- 571. Civil rights immunity is not a defense to discipline by the Commission or its employees.
- 573. Defendants failure to draw lines faithful to laws and the PROFESSIONAL DUTIES derived therefrom effectively abrogates those laws and judicial offer PROFESSIONAL DUTIES thereunder, as no other effective means for enforcing such duties exists.
- 574. Defendants have no discretion to abrogate the Constitution of the United States or the State of Virginia, or any other law, rule, or legislation.
- 576. On information and belief, Defendants have participated in line drawing in such a way as to effectively and illegally abrogate many laws imposing CONSTITUIONAL and JUDICIAL DUTIES on County judicial officers in Virginia jurisdictions, thereby giving express and implied permission to violate those laws.

- 577. In so doing, Defendants have caused or contributed to conditions in which judicial officers are unrestrained by the laws, duties, and responsibilities of their offices and constitutional restrictions on their acts.
- 578. Such conditions have foreseeably lead to a culture of deliberate indifference which precipitated the illegal acts of the judicial officers as described in the Janice Jailing, MALICIOUS PROSECUTION, OBSTRUCITON OF JUSTICE, RACKETEERING, and elsewhere throughout this Complaint.
 579. As an actual and foreseeable result of Defendants' line-drawing to abrogate CONSTITUIONAL and JUDICIAL DUTIES governing judicial officer defendants herein, Janice has been deprived and injured as elsewhere alleged of rights, privileges, and immunities relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; PROCEDURAL DUE PROCESS; ACCESS TO JUSTICE; EXPRESSION, PRIVACY, and ASSOCIATION; and EXCESSIVE FORCE; and CRUEL AND/OR UNUSUSAL PUNISHMENT.
- 580. As an actual and foreseeable result, Janice has been deprived, damage, and injured in a nature and amount to be proven at trial.

Claim 5.2 Obstruction of Justice Failure to Discipline Judicial Defendants 42 U.S.C. § 1983

- 581. This is a Claim for deprivation of rights under color of law for Defendants facilitation and toleration of illegal obstruction of justice creating a widespread culture of deliberate indifference causing foreseeable obstruction of justice and retaliation, constituting constitutional injury to PLAINITFFS as elsewhere alleged.
- 582. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 583. The power and duty to discipline judges includes the duty to protect the process and rights of citizens for doing so. Causing or allowing interference with such processes or afterward in retaliation constitutes a CULPABLE and UNREASONABLE breach of Defendants PROFESSIONAL DUTIES, foreseeably resulting in constitutional deprivations of the complaining citizens and others thereby subject to retaliation or chilled out of fear of same.
- 584. Such deprivations of rights of citizens to utilize the complaint process relate to rights, privileges and immunities to EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE; and SUBSTANTIVE DUE PROCESS. Such interference shall hereafter be referred to as "OBSTRUCTION OF JUSTICE."
- 585. Elected Officials, Commission on Judicial Performance employees are uniquely empowered and therefore bound to protect California litigants' rights under state and federal law to petition the Commission and its employees for grievances against such officers; speak freely about judicial officers and their misconduct both within and outside of the Commission's processes; seek and obtain unfettered, unimpeded, and safe access to such processes; maintain privacy in relation to commission matters and investigations; and preserve procedural and substantive due process rights through their management of complaints, discipline, and protection of witnesses and parties to that process.
- 586. The failure to enact, maintain, policies and practices which assure the integrity of the complaint process foreseeably leads to opportunity and actual retribution by judges who, attune to Defendants and others' impotence to protect their witnesses, creates an environment of deliberate indifference and

inadequate protection of witnesses in the judicial oversight process. As a result, judicial officers have received a "green light" to retaliate against complaining litigants in manners similar to those alleged herein. 587. Defendants are aware that judicial officials are keenly sensitive to public criticism, including complaints by citizens. *Professional Judges* at 1278-79. They are also aware that City / County judges have substantial, often unfettered, discretion to abuse legal process and obstruct justice to retaliate with immunity against citizens who make complaints against a City / County judge should the complaint be revealed to the judge. *Landmark Commc'ns, Inc. v. Virginia*, 435 U.S. 829, 835 (1978); *Supreme Court of Virginia v. Consumers Union of U. S., Inc.*, 446 U.S. 719 (1980).

- 588. On information and belief, Defendants are aware of numerous prior incidents of OBSTRUCTION OF JUSTICE by judicial officers within their power and duty to control, including each judicial officer herein, some of which are similar to the acts of the Janice Jailing COORDINATORS.
- 589. On information and belief, Defendants, and others maintain policies, practices, habits and customs permitting the ability of judges to retaliate successfully, thereby inhibiting, and impeding exercise of litigants, including PLAINITFFS,' rights. Such policies consist, inter alia, of (1) inadequate investigation of original complaints brought by litigants who are dramatically disfavored in the proportion of investigations undertaken and ignored by Defendants and others and (2) Inadequate discipline for interference and retaliation; and (3) inadequate and assurances and protections to litigants during the complaint process to assure complaints are properly treated, including advising litigants of the availability of the available means to protect them and discipline judicial officers who retaliate.
- 590. Defendants are further aware that litigants face unequal risks for retaliation due to unequal discipline for litigant complaints in comparison with complaints by government lawyers. <u>Published Commission statistics show that as little as 2% of all complaints by litigants are acted upon, meaning that litigants who make such complaints remain at jeopardy within the jurisdiction of the judicial official and/or his colleagues, and therefore subject to retribution. By contrast, approximately 50% of complaints by government prosecutors or other judges themselves are acted upon.</u>
- 591. Such inequality inflicts a deprivation of state and federal Constitutional rights to Equal Protection on litigants, including Plaintiffs herein.
- 592. Defendants are also aware that City / County judges regularly refuse to recuse themselves in cases in which they have obvious conflicts of interest, including conflicts due to complaints filed by litigants appearing before them.
- 593. Under Defendants habituated tolerance for judicial misconduct, disregard of ethical canons and constitutional restrictions on abuse of authority, the mere act of identifying a litigant in an investigation subjects her to jeopardy by officer complained of or the officer's colleagues acting in lockstep sympathy. 594. That failure, combined with Defendants impotence to swiftly punish the same in deterrence, makes the act of entrusting a complaint to Defendants at outrageous risk of constitutional injury by county judicial officers behaving as a steerage-fare gallery of feckless *petit-tyran*, perversely immunized under the honor of patriots to indulge frolic, whimsy, and caprice. What shame a profession of reason today endures. 595. Defendants, by virtue of their awareness of the ongoing DUE ADMINISTRATION OF JUSTICE and ENGAGEMENTS, had a duty to protect Plaintiffs in COMPLAINTS and DUE ADMINISTRATION OF JUSTICE—either by effectively protecting Plaintiffs' and their members' identity, or, if not possible, by otherwise assuring that retribution against such citizens is met with swift deterring discipline. 599. Such acts have caused Janice fear and distress, causing her to refrain from subjecting herself to further illegal retribution in accessing courts but, on the other hand Defendants have tortured her so she has no

other choice especially with there newest suite to make her homeless for illegal ill-gotten legal fees she was jailed for.

- 600. The USA, VA and COA acts and failures to act have also foreseeably led to the Jailing of Janice, MALICIOUS PROSECUTION, PROSECUTORIAL MISCONDUCT, OBSTRUCITON OF JUSTICE, and RACKETEERING.
- 601. Defendants failures in responding to the history of complaints against judicial defendants herein, including have thereby deprived Janice of rights, privileges and immunities relating to EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE; and SUBSTANTIVE DUE PROCESS as elsewhere alleged.
- 602. As an actual and foreseeable result, PLAINITFFS have been deprived, damage, and injured in a nature and amount to be proven at trial.

Claim 5.3 42 U.S.C. §1983

- 613. This is a Claim against Defendants for deprivation of rights under color of law based upon the same facts alleged against them under racketeering Claims for Relief
- 614. Plaintiff re-alleges and incorporates by reference RICO Counts for Relief.
- 615. In performing each acts attributed to them in Racketeering Counts, Defendants have CULPABLY and UNREASONABLY breached one or more PROFESSIONAL DUTIES, foreseeably depriving Janice of rights relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; PROCEDURAL DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; EXCESSIVE FORCE; and CRUEL AND/OR UNUSUSAL PUNISHMENT.
- 616. As an actual and foreseeable result, Plaintiffs have been deprived, damaged, and injured in a nature and amount to be proven at trial.

Claim 5.4 Deprivation of Equal Protection 42 U.S.C. § 1983

- 626. This is Claim against Defendants for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983 for implementing, maintaining, and enforcing policies and practices in violation of PLAINTIFS' rights, privileges and immunities to EQUAL PROTECTION, causing foreseeable injury to Plaintiffs as elsewhere alleged.
- 627. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 628. On information and belief, Defendants rule-making responsibilities include power and influence to discriminate on the basis of categories or classes of, litigants, Claims, or judicial officials.
- 629. On information and belief, Defendants create and maintain policies, rules, and practices discriminating against each of the EQUAL PROTECTION CLASSES, and giving special exceptions to family court judges with jurisdiction over litigants within the EQUAL PROTECTION CLASSES.
- 630. On information and belief, this unequal treatment is motivated by invidious discrimination against the EQUAL PROTECTION CLASSES.
- 631. On information and belief, this unequal treatments results in complaints from litigants within the EQUAL PROTECTION CLASSES being prejudicially adjudged as less credible, viable, or important. Such judgments are based on invidious prejudices that family court litigants are "litigants behaving badly," a

- "bunch of borderlines," "angry about everything" lack credibility, importance, or legitimacy, or otherwise inferior or unequal to other litigants. See Exs. 1, 2; EQUAL PROTECTION CLASSES infra.
- 632. For similar reasons, litigant complaints against Family Court judges are treated differently because of what has been described as a "Domestic Relations Exception" to the Constitution of the United States and Constitution of the State of Virginia.
- 633. Despite such error, Defendants, along with other present Defendants, abide the misconception in their practices, effectively discriminating against complaints alleging constitutional deprivations by judges, behaving by word or deed as if court litigants have fewer constitutional rights to offend.
- 634. Such a policy and practice constitutes deprivation of PLAINITFFS' rights, privileges, and immunities relating to EQUAL PROTECTION, and has inflicted foreseeable injury to Plaintiffs as members of each EQUAL PROTECTION CLASS as elsewhere described.
- 635. As an actual and foreseeable result of the acts and omissions of Defendants described hereinabove, Plaintiffs have been deprived, damages, and injured as elsewhere alleged in a nature and amount to be proven at trial.

COUNT 6 Supervisory Liability 42 U.S.C. § 1983

- 636. This is a Count containing Claims against Defendants who maintain supervisory power and responsibility over other Defendants (SUPERVISING DEFENDANTS). The Claims of this Count allege injury under 42 U.S.C. § 1983 caused by breach of those duties foreseeably causing deprivation of rights, damage, and injury.
- 637. Each SUPERVISING DEFENDANT at all times was under the following SUPERVISORY DUTIES:
- A. Policy and Rulemaking: Powers and duties to create, modify, and maintain policies, rules, and restrictions to govern subordinates in compliance with all laws and each SUPERVISING DEFENDANT's and each of their subordinate's PROFESSIONAL DUTIES.
 - b. *Train*: Duties to prepare subordinates for foreseeable risks of causing constitutional deprivation which the subordinate could not be expected to anticipate, and duties to continue and update such training to accommodate known errors and changes in laws and circumstances;
 - c. *Oversight*: Powers and duties to oversee, communicate and interact with, direct, train, and guide subordinates to assure their acts are in accordance with law and each subordinate's PROFESSIONAL DUTIES.
 - d. *Enforcement*: Each SUPERVISING DEFENDANT had duties to enforce policies, and all laws and restrictions relating to their subordinate's PROFESSIONAL DUTIES through discipline and if necessary termination.
 - 638. Each supervisor further was at all times bound under the following PROFESSIONAL DUTIES: CONSTITUTIONAL, SOCIAL WORKER, FIDUCIARY, and at certain times elsewhere alleged, CONTRACTUAL.
 - 639. On information and belief, each SUPERVISING DEFENDANT knew or should have known of:
 Prior disregard of PROFESSIONAL DUTIES and laws, and deprivation of rights by their
 subordinates named herein; The breaches of PROFESSIONAL DUTIES and laws and deprivation of
 rights among their subordinates as alleged herein; Plaintiffs' DUE ADMINISTRATION OF
 JUSTICE, CLAIM AND DEMAND, MALICIOUS PROSECUTION, PROSECUTORIAL
 MISCONDUCT, and NESTHUS OBSTRUCTION OF JUSTICE; Each Scheme and Artifice to

Defraud, ENTERPRISE, and CRIMINAL CONSPIRACY alleged under the RICO ALLEGATIONS infra.

- 640. On information and belief, each SUPERVISING DEFENDANT had further specific knowledge of prior acts by their subordinates, supervisors and/or trainees causing constitutional injury similar to that complained of by Plaintiffs.
- 641. Knowing of these facts, each SUPERVISING DEFENDANT had a duty to investigate, remedy, correct, discipline, re-train, and/or terminate those over whom they had the power to influence or control to conform the behavior of those they supervised to law.
- 642. In CULPABLE and UNREASONABLE breach of one or more SUPERVISORY DUTIES, each SUPERVISING DEFENDANT implemented customs, policies, or practices that created unreasonable risks that subordinates would perpetrate the constitutional injuries elsewhere complained of by Plaintiffs, including: Directing, rewarding, encouraging, or acting with deliberate indifference to the actions of subordinates which led to Plaintiff's constitutional injuries; Failing to change the customs, practices, or policies, or employ corrective practices for subordinates, after having knowledge of actual or threatened constitutional injury; and Facilitating, acquiescing to, endorsing, or ratifying HARRASMENT AND ABUSE.
- 643. Each SUPERVISING DEFENDANT UNREASONABLY and CULPABLY failed to implement remedial measures to prevent further constitutional injuries to Plaintiffs and those similarly situated.

Claim 6.1 Supervisor Liability Against the City of Alexandria, VA, VSB, USA 42 U.S.C. § 1983

- 644. This is a Claim for failure to supervise against the heads of the VA, VSB COA who had official believed at times relevant to this Action, for failure to oversee subordinates as alleged below.
- 645. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 646. That at all times someone the Clerk of Court or other Supervisor type's were aware of the Criminal Acts taking place and ignoring the acts of Defendants provides services as elsewhere alleged, including the criminal ENTERPRISES.
- 647. On information and belief, Defendants UNREASONABLY failed to perform one or more SUPERVISORY DUTY over his or her subordinates, foreseeably causing or permitting the subordinate's acts as elsewhere alleged in Janice's Jailing, CLAIM AND DEMAND, and RACKETEERING, causing deprivation of rights of SUBSTANTIVE DUE PROCESS.
- 648. By virtue of the CULPABLE and UNEASONABLE beaches of PROFESSIONAL DUTIES by each subordinate as elsewhere alleged, each SUPERVISING DEFENDANT has breached one or more SUPERVISORY DUTIES, directly and indirectly depriving Plaintiffs of rights as elsewhere alleged, causing injury in a nature and amount to be proven at trial.

COUNT 7 42 U.S.C. 1983

Municipal Liability, VA Courts Liability, USA Federal Courts Liability, Judicial Council Liability, ADMINISTRATIVE OFFICE OF THE COURTS, City of Alexandria, Prince William County

- 713. This is a Count containing Claims Defendants of Municipal Liability, VA Courts Liability, USA Federal Courts Liability, Judicial Council Liability, ADMINISTRATIVE OFFICE OF THE COURTS, City of Alexandria, Prince William County for deprivation of rights under color of law against "beneath State-level" entities under 42 U.S.C. §1983.
- 714. Defendants to this Count are "governments beneath the state level" within the definition of that term in *Board of Comm'rs v. Brown*, 520 U.S. 397 (1997).
- 715. Each municipal entity herein was at all times bound under the following PROFESSIONAL DUTIES: CONSTITUTIONAL, SUPERVISORY, MUNICIPAL, SOCIAL WORKER, FIDUCIARY, and at times elsewhere alleged, CONTRACTUAL.
- 716. Each Defendant created, maintained, and enforced maintained policies, customs, rules, procedures, traditions, practices, including "line-drawing" activities as elsewhere detailed ("policies") and permitted and directed behaviors by policymakers themselves, causing or permitting deliberate indifference and a culture of deliberate indifference to foreseeable constitutional injury of the type caused to Plaintiff Janice and her in ability to get a fair trial, a Judge with Jurisdiction, to protect Janice from criminal acts of other. in the DDIJO and MALICIOUS, PROSECUTION, and PROSECUTORIAL MISCONDUCT, and OBSTRUCTION OF JUSTICE.
- 717. Administrative Director of the Courts is accountable to the council and the Chief Justice for the performance of the Administrative Office of the Courts. The Administrative Director's authority is limited to accomplishing the council's goals and priorities. A chart depicting the relationship between the ADMINISTRATIVE OFFICE OF THE COURTS, JUDICIAL COUNCIL, and other related defendants. The JUDICIAL COUNCIL or its employees have no authority to perform any "judicial act" as that term is defined in *Ashelman v. Pope*, 793 F.2d 1072, 1075 (9th Cir. 1986).
- 718. Said policies further permitted or were deliberately indifferent to the conduct, participation in, operation, monitoring, discipline, and control of each ENTERPRISE and ENTERPRISE PERSON in a state wide affiliated Enterprise operation that participated in Janice Jailing.
- 719. Each Defendant further failed to properly train its employees prior to its employee's acts elsewhere alleged to have caused constitutional deprivation, damage, and injury, foreseeably resulting in the injury alleged.

COUNT 8 Respondent Superior Liability

754. This is a Claim alleging respondent superior liability against VSB and JIRC for the actions of their agents and employees pursuant to common law Principles of respondent superior.

Claim 8.1 Against VSB

- 755. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 756. VSB is an association to support, facilitate, and coordinate the Virginia State Lawyers / legal industry. The responsibility of the diverse legal community, the VSB aims to support and inform the States lawyers, but also the public and the community. Programs help clients find qualified lawyers, resolve disputes and educate Virginians is their claim. The VSB has had the Ethics Guru send Janice's information of criminal activity to his home instead of to his office. That the Bar is supported off the Lawyers and if

you look at the lawyers disciplined they are not usually part of the Old Boys Network. Janice went she went to them for help was told to go away. We don't discipline our favorites.

757. At all times relevant hereto, Defendant VSB was the superior, employer, and principal of majority of Defendants that COORDINATOR, , and each ENTERPRISE PERSON and a conductor and participant in each ENTERPRISE.

758. Each act attributable to each Janice Jailing COORDINATOR, and each ENTERPRISE PERSON and a conductor and participant in each ENTERPRISE Defendant is attributable to VSB.

759. As an actual and foresceable result of the acts of each subordinate, agent, and employee Defendant, Plaintiffs have been damaged and injured in a nature and amount to be proven at trial.

COUNT 9

Conspiracy to Interfere With Rights 42 U.S.C. § 1985 Against All Defendants

764. This is a Count for conspiracy to interfere with rights under 42 U.S.C. § 1985 against COORDINATOR Defendants based on the Janice's Jailing in Count 1, based on the non-immune acts in the MALICIOUS PROSECUTION and PROSECUTORIAL MISCONDUCT in Count 3, Defendants based on the OBSTRUCTION OF JUSTICE in Count 4, Defendants on acts alleged in Count 5, their supervisors in Count 6, and municipalities in Count 7 (collectively COLOR OF LAW DEFENDANTS).

Claim 9.1 42 U.S.C. 1985(1) Against All COLOR OF LAW DEFENDANTS

765. This is a Claim by Janice against all COLOR OF LAW DEFENDANTS as alleged in each Claim of Counts 1, 3-7, for Preventing Officer from Performing Duties under 42 U.S.C. § 1985(1) against Janice ASSAULT COORDINATOR Defendants based on the Jailing of Janice in Count 1, based on the non-immune acts in the MALICIOUS PROSECUTION and PROSECUTORIAL MISCONDUCT in Count 3, Defendants based on the OBSTRUCTION OF JUSTICE in Count 4, on acts alleged in Count 5, and acts of supervisors and municipalities in Counts 6 and 7.

766. All prior paragraphs are re-alleged and incorporated as if set forth in full.

772. In committing the acts alleged in Counts 1-5 above, COLOR OF LAW DEFENDANTS and each of them conspired as detailed in each Count:

A.To prevent, by force, intimidation, or threat, Janice from accepting or holding a POSITION UNDER THE UNITED STATES; to prevent Janice from any and all employment or investment opportunities 773. As an actual and foreseeable result, Janice has been deprived of rights, privilege, and immunities as alleged in Counts 1, 3-7, damaged or injured in a nature and amount to be proven at trial.

Claim 9.2 Conspiracy to Interfere with Civil Rights 42 U.S.C. 1985(2) Against COLOR OF LAW DEFENDANTS

774. This is a Claim by Janice for obstructing justice; intimidating party, witness, or juror under 42 U.S.C. 1985(2) against Janice COORDINATOR

775. All prior paragraphs are re-alleged and incorporated as if set forth in full.

776. Defendants and each of them conspired as detailed in each Count 1, 3-7 above:

- 777. Plaintiff is Catholic and has been harassed for religious beliefs by Defendants. Subject to historic de facto and de jure invidious discrimination in violation of the 5th and 14th Amendment rights to Equal Protection of the Laws (collectively "EQUAL PROTECTION CLASSES"):
- 785. No Defendant acting under color of law may legally act with discretion in the absence of jurisdiction established by the Constitution of the State of Virginia, United States Constitution, statutes, laws, contract, or regulation.
- 786. Plaintiff' membership in and advocacy for the EQUAL PROTECTION CLASSES was known to and targeted by Defendants prior to her jailing.
- 787. Defendants CULPABLY undertook each of the acts ascribed to them with the intent to cause Janice Jailing MALICIOUS PROSECUTION, PROSECUTORIAL MISCONDUCT, and OBSTRUCTION OF JUSTICE to deprive Plaintiff, of them, of equal protections, privileges, and immunities, including rights related to their PUBLIC BENEFIT ACTIVITIES, DUE ADMINISTRATION OF JUSTICE, and rights as advocates for and on behalf of the EQUAL PROTECTION CLASSES.
- 788. In performing the acts alleged above, COLOR OF LAW DEFENDANTS conspired to deter, injure, Plaintiff, by MALICIOUS PROSECUTION, PROSECUTORIAL MISCONDUCT, and OBSTRUCTION OF JUSTICE, from attending or testifying freely, fully, and truthfully as a party or witness in Plaintiffs' PUBLIC BENEFIT ACTIVITIES, or from testifying to any matter, freely, fully, and truthfully; Plaintiff in their property for lawfully enforcing, or attempting to enforce, the rights of Plaintiff, and each of them, as members of each EQUAL PROTECTION CLASS, to the equal protection of the laws. Hereinafter collectedly referred to as the EQUAL PROTECTION CONSPIRACY.
- 789. As an actual and foreseeable result, Plaintiffs have been deprived of rights, privileges and immunities as set forth in Counts 1, 3-7.

Claim 9.3 Conspiracy to Interfere with Civil Rights 42 U.S.C. 1985(3)(a) (b)(c) Against all COLOR OF LAW DEFENDANTS

- 790. This is a Count for Depriving persons of rights or privileges under 42 U.S.C.1985(3)(a) against Janice, Defendants based on the Jailing in Count 1, DEFENDANTS based on the **non-immune** acts in the MALICIOUS PROSECUTION and PROSECUTORIAL MISCONDUCT in Count 3, Defendants based on the OBSTRUCTION OF JUSTICE in Count 4, on acts alleged in Count 5, and supervisor and municipal entities in Counts 6 and 7.
- 791. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 792. In committing the acts alleged against them in each of Counts 1, 3-7, COLOR OF LAW DEFENDANTS CULPABLY acted in conspiracy for the purpose of depriving Plaintiffs individually as members of and advocates for the EQUAL PROTECTON CLASSES, of the equal protection of the laws and equal privileges and immunities under the laws, including but not limited to their PUBLIC BENEFIT ACTIVITIES, the DUE ADMINISTRATION OF JUSTICE, and retaliating for exercise thereof, causing Plaintiffs reasonably foreseeable and injury therefrom.
- 793. As an actual and foreseeable result, Plaintiffs have been deprived of rights, privileges and immunities, damaged and injured in an amount according to proof at trial.

COUNT 10 Failure to Prevent or Aid in Preventing Deprivation of

Constitutional Rights 42 U.S.C. § 1986 Against COLOR OF LAW DEFENDANTS

- 802. This is a Count for Failure to Prevent or Aid in Preventing Deprivation of Constitutional Rights under 42 U.S.C. § 1986 against Janice.
- 803. On information and belief, Defendants to this Count had knowledge of all relevant facts alleged in this Complaint, including that the acts conspired to be done and committed as alleged in Counts 1, 3-7 were about to be committed.
- 804. Defendants to this Count, and each of them, by virtue of their relationships with each other defendant, their authority under law, and PROFESSIONAL DUTIES, had power to prevent or aid in preventing the commission of the same.
- 805. Defendants to this Count, and each of them, neglected or refused to exercise their powers to prevent or aid in preventing the commission of the same.
- 806. The acts as alleged herein were in fact committed as alleged.
- 807. As an actual and foreseeable result, Plaintiffs have been deprived, damaged, or injured in a nature and amount to be proven at trial.

COUNT 11 Ilona Grenadier et al TERRORISM Breach of Covenant of Good Faith and Fair Dealing 42 U.S.C. § 1983

- 808. This is a Count alleging breach of contract, fraud, extortion, bribery and abuse of process centered on the actions of Defendants Grenadier Law, Ilona, David and Erika acting under color of law, and related deprivations of rights under 42 U.S.C. § 1983
- 809. That the above Defendants conspired to steal from Janice from on or around December of 1986,
- 810. That Ilona acted as Janice's lawyer to protect herself. The documents and letters will show this.
- 811. That on the morning of July 7, 2990 Lawyer Ilona would lie to Janice as she was waiting results to hear how "A" who had been born the night before with an emergency C section with heart issues how she was.
- 812. Lawyer Ilona manipulated a \$30,000. Commission that Mays & Valentine aka Troutman Sanders with her collusion would further the manipulation in the days and weeks to come.
- 815. These representations made were if you want your child ever seeing her father out of jail you had better do this. In return you will get a note due in 30 years with 10 % interest. Ilona has as a lawyer said the note would be safer with her. Ilona a Lawyer refused to hand over such note.
- 816. Ilona breached the contracts and representations by committing extortion, abuse of process, and by failing to abide by each of the above referenced promises, his PROFESSIONAL DUTIES, including duties of disclosure, loyalty, honesty, and good faith, as well as breaching one or more provision of the written contract.
- 817. Ilona exceeded his authority in filing false and misleading documents with the courts and several other agencies. Ilona has been allowed criminal behavior because of a perceived Power in the Old Boys Network of Virginia.
- 818. Ilona Attempting to intimidate, distress, harm, defraud, extort, and rob Janice; is a pattern and practice along with her participation in having Janice Jailed. All lawyers and Judges were aware this was illegal and did it anyways to intimidate and torture a citizen in the United States of America, should worry everyone.

- 910. That the attempts to stop Janice by Defendants accusing her of Extortion was criminal in itself and was made able by the Commonwealth Attorney of the COA, the COA Police..
- 829. Janice was also defrauded by Defendants n a car they have stolen and sold with forged documents alleged in understanding the nature and extent of the enterprise and conspiratorial relationships between the other Defendants giving them a perceived Power.
- 830. As a result of such fraud, duress, undue influence, breach of fiduciary and other PROFESSIONAL DUTIES, Janice has been oppressed, deterred, and unwillingly delayed to initiate this Action until August 20, 2013.

Claim 11.2 Fraud Against Defendants Ilona

- 843. This is a Claim for fraud and negligent misrepresentation by Janice against Defendants.
- 844. All prior paragraphs and all paragraphs below regarding each RICO Count 1, below, are re-alleged and incorporated as if set forth in full.
- 845. At all relevant times, other Defendants acted as an agent and representative for Ilona.
- 846. Ilona's written and oral representations described above were intentional or negligent, false when made, material, and reasonably relied upon Janice
- 847. As an actual and foreseeable result, Janice has been injured in a nature and amount to be proven at trial.

Claim 11.3

Intentional Infliction of Emotional Distress; 42 U.S.C. § 1983; Against all Ilona TERRORISM Defendants

- 848. This is a Claim for intentional infliction of emotional distress by Janice against Ilona and her gangs
- 849. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 850. Ilona's TERRORISM detailed above and throughout were CULPABLE, extreme and outrageous, malicious, fraudulent, and oppressive, reasonably and foreseeably causing Janice severe emotional distress.
- 851. Ilona was at all times acting as an agent, co-conspirator, collaborator, subordinate, and employee of each other Ilona TERRORISM Defendant.
- 852. In committing the acts described in this Complaint, Ilona, Grenadier at Law and her gang of other Defendants and John Does, . foreseeably damaged, injured, and deprived Janice or caused her to be deprived of rights, privileges, and immunities relating to SUBSTANTIVE DUE PROCESS; PROCEDURAL DUE PROCESS; SEARCH AND SEIZURE; EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE, causing deprivation, damage, and injury in a nature and amount to be proven at trial.

Claim 11.4 Failure to Supervise Defendants 42 U.S.C. 1983 and Cal. Const. art. I, § 26

- 873. This is a Claim against VA, COA and USA for supervisory failures causing deprivation of Janice's rights under color of law pursuant to 42 U.S.C. 1983
- 874. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 875. VA, COA and USA SUPERVISING DEFENDANTS, and each of them, at all times had the power to oversee, supervise, train, discipline Ilona and her gang. so as to prevent or aid in preventing the commission of Ilona and other Defendants acts as alleged herein.

- 876. That VA, COA and USA had the administrative and supervising authority to prevent the Jailing of Janice.
- 878. VA, COA and USA are CULPABLY AND UNREASONABLY permitted the Jailing of Janice so to allow Defendants to commit the fraud, abuse of process, extortion, and terror against Janice.
- 879. DEFENDANTS knew or should have known: Ilona's history of fraud, abuse, and illegal conduct described herein; The pattern of illegal activities of the CONSPIRACIES and CRIMINAL ENTERPRISES herein;; and The FEDERAL ENGAGEMENT of Plaintiffs and others regarding Defendants, the ENTERPRISE and CRIMINAL CONSPIRACY operators and affiliates.
- 880. After learning of Ilona's "S history of illegal conduct, fraud, and abuse, Ilona's SUPERVISING DEFENDANTS had a duty to investigate, oversee, re-train, discipline, and/or terminate those over which they had the power to influence or control including Grenadier Law.
- 881. Supervising Defendants failed to implement remedial measures such as reassignment, removal or other disciplinary actions to prevent further constitutional injuries to Plaintiffs and those similarly situated.
- 882. Having this knowledge, Ilona's SUPERVISING DEFENDANTS neglected or refused to prevent or aid in preventing the same.
- 887. Despite the knowledge of past/prior acts causing or likely to cause constitutional injury, Ilona's SUPERVISING DEFENDANTS took no and/or inadequate corrective action, and in fact encouraged the acts that caused or were likely to cause constitutional injury.
- 888. In committing each act as described in this Count, Ilona and other Defendants SUPERVISING DEFENDANTS CULPABLY and UNREASONABLY breached one or more PROFESSIONAL DUTIES, depriving Janice or causing him to be deprived of rights privileges and immunities relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; EXCESSIVE FORCE; and CRUEL AND/OR UNUSUSAL PUNISHMENT, causing deprivation, injury, and damage in a nature and amount to be proven at trial.

COUNT 12 Deprivation of SUBSTANTIVE DUE PROCESS 42 U.S.C. § 1983 Against COLOR OF LAW DEFENDANTS

- 889. This is a Count against each COLOR OF LAW Defendant based on acts alleged against each such Defendant in each Claim herein. This Count asserts that each Defendant's UNREASONABLE and CULPABLE acts under color of law in breach of a duty identified below constitute a deprivation of substantive due process under both the Constitution of the United States and the Constitution of the State of Virginia to all entities foreseeably injured therefrom.
- 890. At all times relevant to this Action, each COLOR OF LAW Defendant and defendant acting under color of law owed one or more PROFESSIONAL DUTIES to each Plaintiff as follows:
- CONSTITUTIONAL: For any Defendant acting under color of law, the following non-discretionary duties: The duty to exercise color of law powers only in the presence of legal authority or jurisdiction provided under enabling legislation, rules, charters, or constitutions, pursuant to VA Const.

The duty to protect, uphold, and defend the laws and the Constitutions and laws of the United States and the State of Virginia;

The duty to act only in the public interest; provide only honest government services;

The duty to avoid all conflict, undue influence, bribery, self-dealing, bias, nepotism:

The duty to commit no reasonably foreseeable deprivation of clearly established civil rights;

The duty to create or inflict no harm unless specifically authorized after due process of law. Pursuant to of the Constitution of the State of Virginia, each Defendant's CONSTITUTIONAL duties for administrative, law enforcement, judicial, quasi-judicial, and prosecutorial functions identified in this Complaint are "mandatory" and "prohibitory." As such, no entity, including but not limited to defendants herein, acting under color of Virginia state law may exercise discretion to perform any act which violates any CONSTUTIONAL DUTY, and no valid law of the State of Virginia may empower an act under color of law which violates any CONSTITUTIONAL DUTY

FIDUCIARY: Duties of trust and loyalty of treating pecuniary interests of named or reasonably foreseeable beneficiaries equal to own. Such duties apply to certain functions of Defendants acting under color of law;

JUDICIAL: Duties to ensure due process and protect rights of all of those within their jurisdiction; all duties enumerated in Canons and related codes of judicial ethics. Such DUTIES apply to all functions of all judicial officers performing any administrative or judicial function;

ATTORNEY/ADVOCATE: Duties of professional competence, loyalty, zealous advocacy and those specifically articulated in the Model Code of Professional Conduct. Such duties apply to all function of all attorneys and certain functions of social worker acting as advocates or advisors

SOCIAL WORKER: Duties of professional competence, act only in public interest;

SUPERVISORIAL: Duties to oversee, supervise, train, instruct, guide, monitor, discipline, and terminate subordinates; to exercise power to prevent or aid in preventing breaches of others with power to influence or control;

SPECIAL RELATIONSHIP: Duties to affirmatively act in situations not otherwise requiring action founded on the existence of a prior engagement, bond, or other relationship;

CREATION OF DANGER: Duties to affirmatively act in situations not otherwise requiring action founded upon the actor's creating a danger or risk to which the duty to act in preventing harm from the risk arises;

CONTRACTUAL: Specific duties under contract; duty of good faith and fair dealing;

MUNICIPAL: Duties of all governments to enact and enforce only constitutional rules, laws, policies, customs, habits, behaviors or procedures; duty to act to prevent foreseeable deprivation of constitutional injury; duty to take action and/or avoid deliberate indifference to actual or likely constitutional injury within authority to act;

THERAPEUTIC: For all mental health professionals, duties to observe all professional standards relevant to their respective professional licensure, best practices, and specialty standards; Duty to do no harm. Such duties apply to Domestic Dispute Industry Professional Service providers.

- 891. In performing each act alleged herein, each Defendant bound at all relevant times by one or more PROFESSIONAL DUTY as elsewhere specified.
- 892. Said PROFESSIONAL DUTIES under which each Defendant to each Count herein acted extended at all times to each Plaintiff named in each Count.
- 893. By virtue of each Defendant's PROFESSIONAL DUTIES, PLAIINTIFFS at all relevant times possessed reciprocal rights to SUBSTANTIVE DUE PROCESS in the performance of those duties of the Constitution of the State of Virginia and the Fifth and Fourteenth Amendments to the United States Constitution.

894. For each entity acting under color of Virginia state law, their breach of a PROFESSIONAL DUTY by CULPABLE or UNREASONABLE conduct as elsewhere alleged, setting in motion foresecable injury, constitutes a deprivation of SUBSTANTIVE DUE PROCESS of those injured.

895. As elsewhere alleged each Defendant breached one or more of said PROFESSIONAL DUTIES UNREASONABLY or CULPABLY, constituting a deprivation of SUBSTANTIVE DUE PROCESS under the Fifth and Fourteenth Amendment to the United States Constitution, causing damage and injury in a nature and amount according to proof at trial.

COUNT 13 Trespass Under Color of Law 42 U.S.C. § 1983 Against Each Defendant

- 896. This is a Claim for trespass under color of law for acts caused in *coram non judice* by each Defendant as elsewhere alleged.
- 897. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 898. Each Defendant acting under color of state law is empowered and restrained from acting by virtue of the respective constitutions, charters, and articles of incorporation, appointments, or other entity formation documents describing the Defendant's jurisdiction. To the extent the powers are derived from the Constitution of the State of Virginia, such powers and restrictions are "mandatory" and "prohibitory" (nondiscretionary) under the Virginia Constitution.
- 899. In causing injury as described in each Count and Claim herein, Defendants acting under color of law, and each of them, acted in excess of and in the complete absence of jurisdiction, causing "off the reservation" injury in violation of Plaintiffs' rights, privileges, and immunities.
- 900. In exceeding the limits of their authority as elsewhere alleged in each Count and Claim herein, Defendants, and each of them, committed a trespass to the property, persons, rights, privileges, and immunities of Plaintiffs, causing a deprivation of same, and are therefore strictly liable for all injury foreseeably resulting therefrom, including each injury identified in each Claim herein, in a nature and amount to be proven at trial.

COUNT 14 Unjust Enrichment

- 901. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 902. In reliance on Count 14 Defendants' acts and omissions, Plaintiff has been wrongfully induced to retain Count 14 Defendants, and as a result has paid in excess to Defendants to be had.
- 903. As an actual and foreseeable result of Defendant Defendants' misfeasance and malfeasance described herein, Defendants have been unjustly enriched in an amount paid by Plaintiff the exact amount to be proven at trial.

COUNT 15 False designation of origin, false description 15 U.S.C. § 1125 Against All Defendants

- 904. This is a Count for false description of services against each Defendant as indicated under 15 U.S.C. § 1125
- 905. All prior paragraphs are re-alleged and incorporated as if set forth in full.

- 906. Defendants, in connection with their businesses, professions, PROFESSIONAL DUTIES, CONSPIRACIES and ENTERPRISE OPERATIONS, use in their advertisements, promotions, sale and offer for sale of their legal services words, terms, names, symbols, and devices, and combinations thereof, (COMMERCIAL SPEECH) which are false and misleading.
- 907. In their COMMERCIAL SPEECH DEFENANTS represent that their services abide by ordinary and professional standards of care, are legal, efficient, safe, and effective exercise of governmental powers and public licenses provided under law as follows per defendant:
- Entity Misrepresentation/Reference All Defendants Each Defendant's COMMERCIAL SPEECH represents that their public and private services are legal, safe, efficient, obedient to PROFESSIONAL DUTIES and standards of care. JUDICIAL COUNCIL, ADMINISTRATIVE OFFICE OF THE COURTS, 910. The Claims of all Defendants described in this Count and elsewhere are false and misleading.
- 911. With respect to each Defendant: a. In their activities described herein, Defendants operate CRIMINAL ENTERPRISES which defraud, abuse, oppress, and deprive Plaintiffs and the general public of their property and liberty.
- b. In their COMMERCIAL SPEECH promotion for such ENTERPRISES, including websites, literature, public appearances, statements and representations, Defendants misrepresent theirs and others' legal and professional services as legal, fair, honest, and beneficial, when in fact they are fraudulent, harmful, inefficient, oppressive, and illegal.
- c. Further, in their advertising and promotion Defendants fail to warn consumers of the illegality of their services, the constitutional deprivations they cause and form the basis of liability for, and the many disastrous pitfalls which occur regularly from use of such professional services. As such, Defendants mislead as to the nature, characteristics, qualities, of their and their ENTERPRISE affiliates' services, including the nature of the ENTERPRISE with purpose..
- d. Defendants mislead consumers by misdirection from superior, legitimate, legal services by one or more, and by advising "that's how it is" in family court, and by failing to advise of the full options consumers have toward legal, healthy, and safe alternatives to avoid the abundant harm likely to befall those who engage in such activities.
- 912. Plaintiffs compete with Defendants for provision of legal services and as detailed in RICO ENTERPRISE allegations below.
- 913. Plaintiffs, their clients, and affiliates provide safe, legal, efficient, and healthier competing professional services in compliance with law. Defendants, by virtue of their illegal collusion, conspiracy, and coordination are competitively advantaged to overcharge for harmful, inefficient, oppressive, and unhealthy services. To protect such inefficient, illegal, and anticompetitive activities, Defendants have and continue to mislead consumers of PLAINTIFFS' and DEFENDANTS' services in their COMMERCIAL SPEECH. Plaintiffs reasonably believe they are likely to be misled and damaged by such COMMERCIAL SPEECH again in the future.
- 914. As an actual and proximate result PLAINTIFS have been injured in a nature an amount to be proven at trial.

RICO ALLEGATIONS RICO DEFENDANTS

915. In addition to the allegations regarding each Defendant above, defendants are each engaged in activities which constitute Enterprise operations under the Racketeer Influenced and Corrupt Organizations

Act of 1970 (RICO). The following entities are defined as a "person," as that term is defined pursuant to Section 1961(3) of RICO. Such Defendants include:

- 925. By virtue of their affiliations, associations, and collaboration as alleged herein, RICO Defendants function collectively as alter ego vehicles of one another facilitate and further the commercial purposes of the ENTERPRISES alleged herein.
- 926. Specifically, in addition to the conspiracy allegations detailed above, each defendant is liable as a principal pursuant to 18 U.S.C. § 2(a)-(b), and that each RICO person that is a RICO defendant is liable as a co-conspirator pursuant to 18 U.S.C. § 371.
- 927. Defendants, and each of them, while affiliated with one or more ENTERPRISES, have operated, affiliated with, and participated directly and indirectly in the conduct of ENTERPRISE affairs through a pattern of racketeering activity, in violation of 18 U.S.C. § 1964 (b), (c), and (d) as follows:

RICO ENTERPRISES

928. Each of the following configurations, for purposes of plaintiff RICO §1962(c) Claims for relief, constitute an enterprise engaged in, or the activities of which affect, interstate or international commerce as those term is defined pursuant to Title 18 United States Code §1961(4) of the Racketeer Influenced and Corrupt Organizations Act of 1970 ("RICO"), *Odom v. Microsoft Corp.*, 486 F.3d 541 (9th Cir. 2007) and *Boyle v. United States*, 129 S. Ct. 2237 (2009) (collectively "RICO ENTERPRISES") The VSB, Judiciary, Government is organized and maintained by and through a consensual hierarchy of, managers, directors, officers, supervisors, agents, deputies, and/or representatives that formulate and implement policies relative to the dispensing and providing the rendition of judicial services to the public, including, but not restricted to, lawyers practicing before, networking with, funding, and collaborating with this enterprise, including, but not restricted to, aspects of family law, child custody, and domestic relations, acting in concert with one and others unknown to Plaintiffs, engaged in a course of conduct and a pattern of practice formulated, designed, intended, implemented, and executed to as part of one or more.

GENERAL ENTERPRISE ALLEGATIONS

With respect to each ENTERPRISE:

Commercial Purpose

- 946. The constituent members comprising each ENTERPRISE are engaged in a concerted campaign to extort, defraud, trick, deceive, corruptly persuade, victims, including primarily family court litigants and their children and extended families.
- 947. Further, in unfairly protecting their commercial purposes, each ENTERPRISE harasses, threatens, assaults, abuses, denigrates, impugn, and/or otherwise harms, threatens, and attempts to harm, competitors, critics, reformers, and others.
- 948. The ENTERPRISES operate as a "cabal," a semi private, sometimes secret, informal affiliation of entities with public presence and identity that is wholly or partially inaccurate and misleading as to the true goals, affiliations, and processes of the cabal. The ENTERPRISES achieve their respective purposes by fraudulent collusion among operators and affiliates, who in their COMMERCIAL SPEECH represent to their clients that the relationships among the members are in compliance with legal and ethical PROFESSIONAL DUTIES when they in fact are not. See "False Flag" and "Poser Advocacy".

(COMMERCIAL PURPOSES).

- 949. The ENTERPRISES also compete unfairly through their COMMERCIAL SPEECH by misrepresenting the legitimacy of the ENTERPRISES, by representing that their illegal behavior is "how it is" in a "take it or leave it" breach of one or more PROFESSIONAL DUTIES.
- 950. The ENTERPRISES also compete unfairly within the marketplace by creating the impression that non-ENTERPRISE entities are incapable of representing the interests of family law clients. In the present case, the ENTERPRISES operated as alleged to suppress and retaliate for Plaintiffs PUBLIC BENEFIT ACTIVITIES by HARRASSMENT AND ABUSE to restrict the family law marketplace access, knowledge, and awareness to only ENTERPRISE operators and affiliates.
- 951. Funded by fraudulent exploitation of the ENTERPRISE operators and affiliates engage in bribery, exchanging value, emoluments, patronage, nepotism, and/or kickback schemes within their networks to assure system-wide "cash flow" and continued viability and vitality of the ENTERPRISES. ENTERPRISES refuse such cooperation with non-affiliates, thereby baring potential competitors. These bars include fraudulently manipulated referrals, representations, certifications, nepotism, illegal antitrust tactics, and manufactured pitfalls to support the pervasive "who you know" cabal in defiance of the rule of law.
 952. When necessary, illegal marketplace protections are perpetrated by illegal criminal justice system sanctions by judicial officer, direct attacks such as the Janice Jailing and HARASSMENT AND ABUSE. This predatory competitive behavior targets any entity, association, or organization that supports and advocates for purposes, including Plaintiffs (ENTERPRISE UNFAIR COMPETITION).

Scheme and Artifice to Defraud 1 False Flag breach of PROFESSIONAL DUTIES

- 984. Defendants have operators regularly breach one or more of their PROFESSIONAL DUTIES of loyalty, zealous advocacy, fiduciary responsibility, and professional competence through one or more "false flag" frauds to induce, deprive, or deceive These "False Flag" maneuvers involve one or more COMMERCIAL SPEECH misrepresentations, thereby depriving them of the benefits of legal professional services, and perpetrating fraud. "False Flag" schemes and artifices include:
- 985. *Poser Advocacy*: "Poser Advocacy" is the practice and sale of what appears to be the practice of law to the unsophisticated. Attorneys engaging in poser advocacy act to appeal to their client's emotions, greed, or other untoward ends to generate fees with no beneficial legal work performed. Poser advocates write angry letters ("paperwads"), exchange worthless formwork discovery, or repeatedly file baseless motions with no hope of success ("kite bombs"), to generate what looks like legitimate legal work to an unsophisticated acclimated to a daytime TV diet of Judge Judy drama and CSI suspense.
- 986. In the more sophisticated commercial legal marketplace, poser advocacy is not tolerated as clients insist, and attorneys abide by, legitimate practice and ethical standards. Because of the unique nature of the clients and market.
- 987. Yet given the nature of the marketplace and absence of awareness of the fraud, there is little incentive to eradicate its existence. Because it is highly profitable, even if illegal, it is therefore quietly encouraged. Because it can only exist in a market place where all players—the attorneys, professional service providers, and even judges—play along, it requires a "cabal" enterprise to be successful. Outsiders such as Plaintiffs who offer legal, safe, and far more efficient services are market spoilers, and as such are illegally targeted as described herein.

- 988. False Flag Collusion: Operatives regularly collude with erstwhile opponents—opposing counsel or entities representing the state, or at appropriate times working with or on behalf of the client or jointly with the client. Such collusion is a violation of one or more PROFESSIONAL DUTIES of loyalty, zealous advocacy to assert client rights adverse to other entitles, and fiduciary responsibility.
- 989. False Flag Abstention: fail to observe of assert for the client rights when under one or more PROFESSOINAL DUTIES to do so, failure to observe constitutional restrictions on use of color of law authority. Such failures in general include:
- 990. Failure to object to impermissible procedure, inadmissible evidence, and move to strike scandalous or impertinent matter;
- 991. Failure to insist on procedure consistent with the Virginia Code of Civil Procedure for motions;
- 992. Failure to seek sanctions for improper procedure;
- 993. Failure to object to unconstitutional laws, or processes harmful to their client;
- 994. Permitting or cooperating with Family Court or opposing counsel to misrepresent the rights and duties adverse to the client;
- 995. Otherwise failing to zealously represent the client's interests.

RICO §1961(5) PATTERN OF RACKETEERING ACTIVITY ALLEGATIONS 18 U.S.C. § 1961(5) COMMISSION OF RICO §1961(1)(B) RACKETEERING ACTIVITY:

1000. RICO Defendants engage in the following "racketeering activity," as that term is defined pursuant to 18 U.S.C. § 1961(5) ("RACKETEERING ACTIVITY"). RICO Defendants' RACKETEERING ACTIVITY as committing, aiding and abetting, or conspiring to commit, tens of thousands of violations of the following laws within the past ten years, including:

- A. Fraud and related activity in connection with identification documents, authentication features,
- B. and information: 18 U.S.C. § 1028;
- C. Mail Fraud: 18 U.S.C. § 1341
- D. Wire Fraud: 18 U.S.C. § 1343
- E. Bank Fraud: 18 U.S.C. § 1344
- F. Intangible Personal Property Right Deprivation: Title 18 U.S.C. § 1346.
- G. Influencing or injuring officer or juror generally: 18 U.S.C. § 1503;
- H. Obstruction of proceedings before departments, agencies, and committees: 18 USC § 1505;
- I. Obstruction of Criminal Investigations: 18 U.S.C. § 1510;
- J. Tampering with a witness, victim, or an informant: 18 U.S.C. § 1512;
- K. Retaliating against a witness, victim, or an informant: 18 U.S.C. § 1513;
- L, Peonage; obstructing enforcement: 18 U.S.C. § 1581,
- M. Enticement into slavery; 18 U.S.C. § 1583;
- N. Sale into involuntary servitude: 18 U.S.C. § 1584;
- O. Seizure, detention, transportation or sale of slaves: 18 U.S.C. § 1585;
- P. Service on vessels in slave trade: 18 U.S.C. § 1586;
- Q. Possession of slaves aboard vessel: 18 U.S.C. § 1587;
- R. Forced labor: 18 U.S.C. § 1589;
- S. Trafficking with respect to peonage, slavery, involuntary servitude, or forced labor: 18 U.S.C. § 1590;

- T. Unlawful conduct with respect to documents in furtherance of trafficking, peonage, slavery, involuntary servitude, or forced labor: 18 U.S.C. 1592;
- U. Benefitting financially from peonage, slavery, and trafficking in persons: 18 U.S.C. § 1593A;

Conspiracy, attempt to commit acts of peonage, slavery, proscribed: 18 U.S.C. § 1594;

- W. Interference with commerce by threats or violence: 18 USC § 1951;
- X. Interstate and foreign travel or transportation in aid of racketeering enterprises: 18 U.S.C. § 1952;
- Y. Violent crimes in aid of racketeering activity: 18 U.S.C. § 1959
- Z. Principal and Aider and Abettor, Attempt, Conspiracy Liability: Title 18 U.S.C. § 2(a) and (b).

RACKETEERING COUNT 1 18 U.S.C. §§ 1962(c), (d) Frauds and Swindles 18 U.S.C. §§ 1341, 1343, 1344

1001. This is a Count asserting numerous Claims for relief under RICO section 1962 (c) and (d), based upon predicate crimes actionable under 18 U.S.C. § 1341, 1343, and 1346 for Mail, Wire, and Bank Fraud, against defendants as identified per Claim in this Count.

1002. All prior paragraphs are re-alleged and incorporated as if set forth in full.

General Allegations to Racketeering Count 1

1003. Defendants, having affiliated with one or more ENTERPRISE and devising or intending to devise one or more for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, delivered invoices, accountings, billing statements, letters, reports, and other correspondence into the U.S. mails, email, telephone facsimile to Janice.

1004. Such use of U.S. mails, emails, facsimile, and wire occurred as follows:

1005 That defendants mailed, emailed documents that were riddled with lies and untruths to protect one of there own Lawyer Ilona Grenadier Heckman.

1006 Lawyers / Defendants there agents on several occasions mislead and Obstructed Justice in the courts to protect one of their own.

RACKETEERING COUNT 2 18 U.S.C. §§ 1962(c), (d) Honest Services Fraud 18 U.S.C. § 1346 Against All RICO Defendants

1031. This is a Count asserting numerous Claims for relief under RICO section 1962 (c) and (d), based upon predicate crimes actionable under 18 U.S.C. § 1346 for Honest Services Fraud, against defendants as identified per Claim in this Count.

1032. All prior paragraphs are re-alleged and incorporated as if set forth in full.

General Allegations to Count 2

1033. Defendants engaged in one or more Enterprise against Janice by and in conjunction with the ENTERPRISES to deprive Plaintiffs of the intangible right of honest services.

1034. On information and belief, Defendants, and each of them, support and promote one another in perpetrating each actionable fraud, bribery and/or kickbacks, wherein a quid pro quo (monetary,

preferential referral, business referral, and/or some other form of benefit) is provided by the RICO defendants to persons unknown to plaintiffs to assure that Plaintiffs in their PUBLIC BENEFIT ACTIVITIES would be effectively punished, silenced, discredited, and rendered ineffective as an effectively competing alternative vehicle offering reasonable and realistic forms of professional quality services to counsel and advise individual parents and guardians addressing family law, child custody, and domestic relations issues.

1035. In the case of many of the Defendants, these quid-pro-quo exchanges are backed up with use of one or another, such as "that's just how it is" or extortion such as "if you ever want to see your girls again" which are enabled by the abuse of process tools of The Pit and abstention/enforcement of illegal Acts and ORDERS. In Janice's case, additional muscle was provided by the Sheriffs in torturing her while in jail. 1036. The fraudulent quid-pro-quo ignores ethical duties of loyalty and zealous advocacy among putative opponent lawyers, and judicial officials who disregard their ethically-required adversarial obligations and duties to enforce law to re-define their opponents as their own clients, take their opponents interests above their clients' collaborating with opposing counsel and state interests under color of law to extort, defraud, and abuse their own client base, whom they refer to as "Litigants Behaving Badly" in a grotesque and reprehensible criminal enterprise conducted with full knowledge, consent, and contribution from public and private servants alike. Or the hiring of Michael Stuart to drug and get sexual inappropriate pictures, to rape one of Janice's daughters, plant drugs in the home or on one of the girls this was by all appearance ordered by Judge Clark to give the appropriate evidence to make Janice Incompetent to file any other documents. Ilona, David, DiMuro and Wieser and others where in on the Scheme.

1037. Such conduct constitutes the deprivation of the intangible personal property right to receive 'honest-services' for purposes of 18 U.S.C. §§ 1341, 1343, and 1346.

1038. As an actual and proximate result, Plaintiffs have been damaged or injured in a nature and amount to be proven at trial.

RACKETEERING COUNT 3 18 U.S.C. 1962(c), (d) Kidnapping

1039. This is a Count asserting Claims for Relief under 18 U.S.C. § 1962 (c) and (d) based upon commission of the predicate crimes of

1040. Each Claim for Relief in this Count is actionable as a predicate crime under 18 U.S.C. § 1961(1)(A) as "any act or threat involving ... kidnapping, ... robbery, bribery, extortion ... which is chargeable under State law and punishable by imprisonment for more than one year."

1041. Each act of each Defendant in each Claim in this Count was committed in conducting, participating in, conspiracy with, or aiding and abetting in furtherance of he purposes of each ENTERPRISE with which the Defendants is affiliated.

1042. At all times relevant to this Count, each Defendant hereto acted CULPABLY with knowledge of the illegal nature of the Janice Jailing and Kidnapping of Janice and her witness's by the Commonwealth Attorney Randy Sengel and Judge Bowen Potter to protect there own. Defendants' and each of their, intent to interfere illegally with Plaintiffs' PUBLIC BENEFIT ACTIVITIES and DUE ADMINISTRATION OF JUSTICE.

1043. At no time relevant to this Count did Janice act on his free will or consent.

1044. At no time relevant to this Count did any Defendant act with probable cause, good faith, or pursuant to lawful authority.

RACKETEERING COUNT 4 Extortion 18 U.S.C. § 1951

1074. This is a Count against Defendants under 18 U.S.C. § 1962 (c) and (d), based upon predicate crimes of extortion under 18 U.S.C. § 1951 under 18 U.S.C. § 1961(1) (A) as "any act or threat involving ... kidnapping, ...robbery, bribery, extortion ... which is chargeable under State law and punishable by imprisonment for more than one year."

Racketeering Claim For Relief 4.1 Extortion, Robbery 18 U.S.C. § 1951

1075. This is a Claim against Defendants for extortion and robbery pursuant to 18 U.S.C. § 1951.

1076. All prior paragraphs are re-alleged and incorporated as if set forth in full.

1077. Defendants, in committing each act described in the response to the CLAIM AND DEMAND, (d) MALICIOUS PROSECUTION and (e) PROSECUTORIAL MISCONDUCT, attempted, conspired, aided and abetted, and did obstruct, delay, and affect commerce or the movement of any article or commodity in commerce, namely, money and valuable things consisting of, inter alia, (1) money payments to lawyers for services never rendered., abandonment of the competitive PUBLIC BENEFIT ACTIVITES, and abandonment of the DUE ADMINISTRATION OF JUSTICE by robbery and extortion, committed and threatened physical violence to Janice and her girls PROPERTY in furtherance of a plan or purpose to extort and rob Janice, .

1078. As an actual and foreseeable result, Janice has been damaged and injured in a nature and amount to be proven at trial.

Racketeering Claim For Relief 4.2

1079. This is a Claim against Defendants for extortion pursuant to a crime under 18 U.S.C. § 1961(1)(A) as "any act or threat involving ... kidnapping, ... robbery, bribery, extortion ... which is chargeable under State law and punishable by imprisonment for more than one year."

1080. All prior paragraphs are re-alleged and incorporated as if set forth in full.

1081. Defendants, and each of them, in committing each act alleged above, attempted, conspired, aided and abetted, and did obtain property, namely (1) payment of money and abandonment of money Claims relating to Divorce Lawyer Ilona (2) payment of money and abandonment of money Claims money Claims relating to Ilona, (3) abandonment of the competitive PUBLIC BENEFIT ACTIVITES, and (6) abandonment of the DUE ADMINISTRATION OF JUSTICE from Janice (1) induced by a wrongful use of force or fear (2) under color of official right in the (a) Ilona TERRORISM, (b) FRAUD, (c) the response to the CLAIM AND DEMAND, (d) MALICIOUS PROSECUTION and (e) PROSECUTORIAL MISCONDUCT.

1082. As an actual and foreseeable result, Janice has been damaged and injured in a nature and amount to be proven at trial.

RACKETEERING COUNT 5 Obstruction of Justice 18 U.S.C. §§ 1962(c), (d)

1083. This is a Count asserting Claims for relief under RICO section 1962 (c) and (d), based upon predicate crimes actionable against Defendants identified in each Claim of this Count.

Racketeering Claim for Relief 5.1 Obstruction of Justice 18 U.S.C. §§ 1962(c), (d) 18 U.S.C. § 1503

This is a Claim against Defendants for Influencing Or Injuring Officer Or Juror Generally pursuant to 18 U.S.C. § 1503.

1084. All prior paragraphs are re-alleged and incorporated as if set forth in full.

1085. Defendants, by the (1) Janice Jailing, (2) MALICIOUS PROSECUTION, (3) PROSECUTORIAL MISCONDUCT, and (4) OBSTRUCTION OF JUSTICE corruptly, by threats and force, by threatening letter or communication, endeavored to influence, intimidate, and impede Janice in performance of her PROFESSIONAL DUTIES, and corruptly or by threats or force, and by threatening letter or communication, influenced, obstructed, and impeded, and endeavors to influence, obstruct, and impede, Plaintiffs from continuing in their cooperation with the FEDERAL LAW ENFORCEMENT OFFICERS in pursuing the DUE ADMINISTRATION OF JUSTICE.

1086. As an actual and proximate result, Plaintiffs have been damaged or injured in a nature and amount to be proven at trial.

Racketeering Claim for Relief 5.2 Obstruction of Justice 18 U.S.C. §§ 1962(c), (d) 18 U.S.C. § 1505

1087. This is a Claim against Defendants for Obstruction of proceedings before departments, agencies, and committees pursuant to 18 U.S.C. § 1505.

1088. All prior paragraphs are re-alleged and incorporated as if set forth in full.

1089. Defendants corruptly and by force or threat of force in the (1) Janice Jailing, (2) MALICIOUS PROSECUTION, (3) PROSECUTORIAL MISCONDUCT, and (4) OBSTRUCTION OF JUSTICE endeavored to and did influence, obstruct, or impede Plaintiff PUBLIC BENEFIT ACTIVITES and the DUE ADMINISTRATION OF JUSTICE before FEDERAL LAW ENFORCEMENT OFFICERS, and the due and proper exercise of the power of inquiry under which any inquiry or investigation is being had by either House, or any committee of either House or any joint committee of the Congress of the United States pursuant to PLAINIFF's PUBLIC BENEFIT ACTIVITIES before the Representatives of the United States. 1090. As an actual and proximate result, Plaintiff have been damaged or injured in a nature and amount to be proven at trial.

Racketeering Claim for Relief 5.3
18 U.S.C. §§ 1962(c), (d)

Tampering with a witness, victim, or informant – other harm
18 U.S.C. § 1512(a) (b) (c) (d)(e) (2)(A), (B), (C),

1091. This is a Claim against Defendants for Tampering with a witness, victim, or informant pursuant to 18 U.S.C. § 1512(a)(b)(c)(e)(2)(A)., (B), (C),

1092. All prior paragraphs are re-alleged and incorporated as if set forth in full.

1093. Defendants, by the (1) Janice Jailing, (2) MALICIOUS PROSECUTION, (3) PROSECUTORIAL MISCONDUCT, and (4) OBSTRUCTION OF JUSTICE CULPABLY used and threatened use of physical

force, including confinement, against Janice, and the threat and attempted to do so, with intent to influence, delay, or prevent the testimony of Plaintiffs and her witness's, in THE DUE ADMINISTRATION OF JUSTICE.

- 1110. Defendants acted corruptly in making the fraudulent and coercive statements attributed to them in each section above, thereby acting with an improper purpose to obstruct, thwart or mislead Janice into diverting their contacts with the U.S. Attorney's Office, F.B.I, and others in the DUE ADMINISTRATION OF JUSTICE and PUBLIC BENEFIT ACTIVITIES
- 1112. Defendants' false, misleading, deceptive, concealing, or destroying behavior included disingenuous allegations, including claims in a complaint that violated Janice United States Constitutional rights and federal criminal law.
- 1094. As an actual and proximate result, Plaintiffs have been damaged or injured in a nature and amount to be proven at trial.

Racketeering Claim for Relief 5.4 18 U.S.C. §§ 1962(c), (d) Conspiracy to Retaliate against a witness, victim, or an informant 18 U.S.C. § 1513(f)

- 1127. This is a Claim against all RICO Defendants for Conspiracy to Retaliate against a witness, victim, or an informant to 18 U.S.C. § 1513(f).
- 1128. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 1129. Defendants, and each of them, CULPABLY conspired with each other DEFENANT to commit each act described above.
- 1130. As an actual and foreseeable result, Plaintiffs have been damaged or injured in a nature and amount to be proven at trial.

RACKETEERING COUNT 6 18 U.S.C. §§ 1962(c), (d) Violent Crime in Aid of Racketeering 18 U.S.C. § 1959

- 1131. This is a Claim against Defendants by Janice for Violent Crime in Aid of Racketeering pursuant to 18 US.C. § 1959.
- 1132. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 1133. Defendants in the (1) Janice Jailing, (2) MALICIOUS PROSECUTION, and (3) PROSECUTORIAL MISCONDUCT attempted, threatened, conspired, aided and abetted, and did kidnap, assaulted with a dangerous weapon, assaulted resulting in serious bodily injury upon, and threatened to commit a crime of violence to Janice in violation of the laws of the State of Virginia and the United States, in exchange for (i) consideration, a promise or agreement to pay, pecuniary value, from each of the ENTERPRISES, or (ii) the purpose of gaining entrance to or maintaining or increasing position in each of the ENTERPRISES.
- 1134. As an actual and proximate result, Plaintiffs have been damaged or injured in a nature and amount to be proven at trial.

RACKETEERING COUNT 7
RICO Aiding and Abetting
18 U.S.C. §§ 2(a)-(b) and §1962(c))]
Against All RICO Defendants

- 1135. This is a Claim against all RICO Defendants for aiding and abetting primary contravention of 18 U.S.C. § 1962(c) under 18 U.S.C. § 2(a)-(b) and § 1962(c).
- 1136. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 1137. Defendants employed the U.S. mails and/or federal interstate wires, as well as engaged in racketeering activity as alleged herein, to aid and abet the primary RICO § 1962(c)) contraventions committed by Defendants as alleged herein above.
- 1138. Defendants were knowledgeable and aware of the commission of the primary RICO contraventions committed.
- 1139. Defendants substantially assisted in the commission of the primary RICO contraventions by said defendants, thereby deriving a monetary benefit as a result thereof to the detriment of Plaintiffs.

RICO Recovery

1140. Plaintiffs pray, pursuant to Title 18 United States Code §1964(c)), treble damages in the amount to be determined by offer of proof at time of trial. Plaintiffs are also entitled to recover attorneys' fees and costs of this litigation, as well as damages arising from lost profits and/or lost business opportunities attributable to the activities engaged in by defendants committed in furtherance of each RICO ENTERPRISE.

RACKETEERING COUNT 8

Aiding and Abetting a RICO Section 1962(d) Conspiracy 18 U.S.C. §§ 2(a)-(b) and §§1962(c)-1962(d) Against All RICO Defendants

- 1141. This is a Claim against all RICO Defendants for aiding and abetting a RICO Section 1962(d) conspiracy in contravention of 18 U.S.C. § 1962(c), pursuant to 18 U.S.C. §§ 2(a)-(b) and 1962(c)-1962(d).
- 1142. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 1143. Defendants employed the United States mails and/or interstate wires, as well as engaged in racketeering activity as alleged herein, to aid and abet the primary RICO § 1962(c)) contraventions committed by Defendants and other RICO Defendants and persons unknown to plaintiffs as alleged herein above.
- 1144. Defendants' actions constitute mediate causation resulting in exertion of some causal effect upon other Defendants' conduct by virtue of the affiliating with one another for criminal purposes.
- 1145. Such criminal affiliation constitutes a voluntary act committed with a culpable mens rea that causes a societal harm and concomitant social harm.
- 1146. Defendants' conduct constitutes aiding and abetting a RICO §1962(d) conspiracy inasmuch as defendants: were associated with a criminal venture as alleged herein; participated in the criminal venture as something the defendants wished to bring about; and sought by their actions to make it succeed.
- 1147. Defendants were knowledgeable and aware of the commission of the primary RICO contraventions committed by others.
- 1148. Defendants substantially assisted in the commission of the primary RICO contraventions, thereby deriving a monetary benefit as a result to the detriment of Plaintiff.
- 1149. Defendants aided and abetted a RICO Section 1962(d) conspiracy between said defendants to contravene RICO Section 1962(c)) to injure and/or damage Plaintiffs' interests in business and/or property.

1150. Plaintiffs allege that Defendants are conspiratorially liable under *Pinkerton*, v. U.S., 328 U.S. 640 (1946) and *Salinas* v. U.S., 522 U.S. 52 (1997) for the substantive RICO Section 1962(c)) contraventions committed by defendant inasmuch as Defendants:

engaged in the fraudulent activities that constitute the RICO §1961(5) pattern of racketeering activity;

are members of the RICO §1962(d) conspiracy designed and intended to contravene RICO § 1962(c)):

engaged in activities in furtherance of advancing and promoting the RICO §1962(d) conspiracy designed and intended to contravene RICO § 1962(c));

are members of the RICO §1962(d) conspiracy at and during the time frame the fraudulent activities were committed that constitute the RICO §1961(5) pattern of racketeering activity; and,

The offense fell within the scope of the unlawful agreement and could reasonably have been foreseen to be a necessary or natural consequence of the unlawful agreement.

RICO Recovery

1151. Plaintiffs are entitled to recover, pursuant to Title 18 United States Code §1964(c)), treble damages in the amount to be determined by offer of proof at time of trial. Plaintiffs are also entitled to recover attorneys' fees and costs of this litigation, as well as damages arising from lost profits and/or lost business opportunities attributable to the activities engaged in by defendants committed in furtherance of each RICO ENTERPRISE.

RACKETEERING COUNT 9

Conspiracy to violate 18 U.S.C. 1962(c)
Pursuant to 18 U.S.C. § 1962(d)\ *Pinkerton v. U.S.*, 328 U.S. 640 (1946) and *Salinas v. U.S.*, 522 U.S. 52 (1997)
Against All RICO Defendants

- 1152. This is a Claim against all RICO Defendants for commission of conspiratorial contravention of 18 U.S.C. § 1962(c) based on a conspiracy as defined under 18 U.S.C. § 1962(d), *Pinkerton v. U.S.*, 328 U.S. 640 (1946) and *Salinas v. U.S.*, 522 U.S. 52 (1997).
- 1153. All prior paragraphs are re-alleged and incorporated as if set forth in full. RICO Conspiratorial Liability—Mediate Causation Contentions
- 1154. In committing each act alleged, Defendants mutually agreed to engage in the aforementioned racketeering activities and/or other wrongful conduct giving rise to the RICO Section 1962(c) contraventions.
- 1155. The objective of that mutual agreement was to destroy Plaintiffs' interests in business and/or property.
- 1156. Such conduct constitutes contravention of 18 U.S.C. § 1962(d).
- 1157. Further, Defendants' actions are deemed to constitute mediate causation resulting with the exertion of some causal effect upon other Defendants' conduct by virtue of the affiliating with one another for criminal purposes.
- 1158. Such criminal affiliation constitutes a voluntary act committed with a culpable mens rea that causes a societal harm and concomitant social harm.
- 1159. Defendants employed the U.S. mails and/or interstate wires, as well as engaged in racketeering activity as alleged herein, to aid and abet the primary RICO § 1962(c)) contraventions committed by Defendants and other RICO persons unknown to plaintiff as alleged herein above.

- 1160. Defendants were aware of the commission of the primary RICO contraventions.
- 1161. Defendants substantially assisted in the commission of the primary RICO contraventions, thereby deriving a monetary benefit as a result to the detriment of Plaintiffs.
- 1162. Defendants aided and abetted a RICO Section 1962(d) conspiracy between said defendants to contravene RICO Section 1962(c)) to injure and/or damage plaintiffs' interests in business and/or property.
- 1163. Defendants are liable as conspirators as defined under *Pinkerton*, v. U.S., 328 U.S. 640 (1946) and *Salinas* v. U.S., 522 U.S. 52 (1997)] for the substantive
- RICO Section 1962(c)) contraventions committed by other Defendants inasmuch as Defendants: engaged in the fraudulent activities that constitute the RICO §1961(5) pattern of racketeering activity;
 - are members of the RICO §1962(d) conspiracy designed and intended to contravene RICO § 1962(c));
 - engaged in activities in furtherance of advancing and promoting the RICO §1962(d) conspiracy designed and intended to contravene RICO § 1962(c));
 - are members of the RICO §1962(d) conspiracy at and during the time frame the fraudulent activities were committed that constitute the RICO § 1961(5) pattern of racketeering activity; and,
 - The offense fell within the scope of the unlawful agreement and could reasonably have been foreseen to be a necessary or natural consequence of the unlawful agreement.

RICO Recovery

1164. Plaintiffs are entitled to recover, pursuant to 18 U.S.C. §1964(c)), treble damages in the amount to be determined by offer of proof at time of trial. Plaintiffs are also entitled to recover attorneys' fees and costs of this litigation, as well as damages arising from lost profits and/or lost business opportunities attributable to the activities engaged in by defendants committed in furtherance of each RICO ENTERPRISE.

RACKETEERING COUNT 10

Aiding and Abetting a Conspiracy to Contravene 18 U.S.C. § 1962(c) 18 U.S.C. § 1962(d)/Pinkerton v. U. S., 328 U.S. 640 (1946) and Salinas v. U. S., 522 U.S. 52 (1997)

Against All RICO Defendants

- 1165. This is a Claim for conspiracy to contravene 18 U.S.C. § 1962(c) by a conspiracy to commit aiding and abetting under 18 U.S.C. § 1962(c) and *Pinkerton v. U.S.*, 328 U.S. 640 (1946) and *Salinas v. U.S.*, 522 U.S. 52 (1997)
- 1166. All prior paragraphs are re-alleged and incorporated as if set forth in full. RICO Conspiratorial Liability—Mediate Causation Contentions
- 1167. At relevant times Defendants mutually agreed to engage in the aforementioned racketeering activities and/or wrongful conduct giving rise to the RICO § 1962(c) contraventions.
- 1168. The objective of that mutual agreement was to destroy Plaintiffs' interests in business and/or property.
- 1169. Such conspiratorial conduct constitutes contravention of RICO §1962(d).
- 1170. Defendants' actions constitute mediate causation resulting with the exertion of some causal effect upon other Defendants' conduct by virtue of the affiliating with one another for criminal purposes.
- 1171. Such criminal affiliation constitutes a voluntary act committed with a culpable mens rea that causes a societal harm and concomitant social harm.

- 1172. Defendants employed the U.S. mails and/or interstate wires, as well as engaged in racketeering activity as alleged herein, to aid and abet the primary RICO § 1962(c)) contraventions committed by other Defendants as alleged herein above.
- 1173. Each Defendant was aware of the commission of the primary RICO contraventions committed.
- 1174. Each Defendant substantially assisted in the commission of the primary RICO contraventions by defendants, thereby deriving a monetary benefit as a result to the detriment of plaintiffs.
- 1175. Plaintiffs allege that defendants are conspiratorially liable under *Pinkerton*, v. U.S., 328 U.S. 640 (1946) and *Salinas* v. U.S., 522 U.S. 52 (1997) for the substantive Section 1962(c)) contraventions committed by Defendants inasmuch as Defendants:

engaged in the fraudulent activities that constitute the RICO §1961(5) pattern of racketeering activity; are members of the RICO §1962(d) conspiracy designed and intended to contravene RICO § 1962(c)); engaged in activities in furtherance of advancing and promoting the RICO §1962(d) conspiracy designed and intended to contravene RICO § 1962(c)); are members of the RICO §1962(d) conspiracy at and during the time frame the fraudulent activities were committed that constitute the RICO §1961(5) pattern of racketeering activity; and,

The offense fell within the scope of the unlawful agreement and could reasonably have been foreseen to be a necessary or natural consequence of the unlawful agreement.

RICO Recovery

1176. Plaintiffs are entitled to recover, pursuant to 18 U.S.C. § 1964(c)), treble damages in the amount to be determined by offer of proof at time of trial. Plaintiffs are also entitled to recover attorneys' fees and costs of this litigation, as well as damages arising from lost profits and/or lost business opportunities attributable to the activities engaged in by defendants committed in furtherance of the ENTERPRISES

RACKETEERING COUNT 11 Petition for Orders Dissolving RICO Enterprises 18 U.S.C. § 1964 §§ (a)-(b) Against All RICO Enterprises Only

- 1177. This is a Claim Against All RICO Enterprises for Orders of this Court dissolving each RICO Enterprise pursuant to 18 U.S.C. §§ 1964(a)-(b)
- 1178. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 1179. Plaintiffs respectfully petition the Court, pursuant to 18 U.S.C. §§ 1964(a)-(b) to issue an order immediately dissolving each identified RICO §1961(4) ENTERPRISE herein inasmuch as said RICO ENTERPRISES are each a mere subterfuge and/or alter ego vehicle for the afore mentioned RICO defendants to engage in felonious, fraudulent, corrupt, violent, and illegal conduct, as alleged herein.

RICO Recovery

1180. PLAINITFFS are entitled to recover, pursuant to 18 U.S.C. § 1964(c) treble damages in the amount to be determined by offer of proof at time of trial. PLAINITFFS are similarly entitled to recover attorneys' fees and costs of this litigation, as well as damages arising from lost profits and/or lost business opportunities attributable to the activities engaged in by Defendants committed in furtherance of the ENTERPRISES.

PROSPECTIVE RELIEF

1181. For each Count seeking prospective relief below, Plaintiffs allege:

FICRO COUNTS 1-22:

Fraud; Deprivation of Rights, Privileges and Immunities Pursuant to 42 U.S.C. Sections 241, 242, 371

Against Defendants acting under color of law

1182. This is an allegation that Defendants in committing the acts alleged in COUNTS 1-11 and RICO COUNTS 1-11, above, concurrently committed one ore move deprivations of Plaintiffs' rights, privileges, and immunities in violation of 18 U.S.C. §§ 242, 241, and 371. These allegations are relevant to Defendants' ENTERPRISE, conspiracy, and racketeering activity, and are the basis for Plaintiffs' Claims for prospective relief under 28 U.S.C. § 2201. As such violations are indictable federal offenses, and shall hereinafter be referred to as FEDERAL INDICTABLE CIVIL RIGHTS OFFENESES (FICRO).

- 1183. As part of their ongoing CIVIL and CRIMINAL CONSPIRACIES to deprive Plaintiff and others similarly situated of and other civil rights, Defendants have CULPABLY committed each Count and Claim for relief alleged herein in furtherance of the conspiracies alleged hereinabove, establishing the existence of the crimes, conspiracies, and enterprises alleged herein.
- 1184. Defendants' activities described herein constitute a conspiracy to commit one or more violations of the Family Federal Rights, actionable under the Civil Rights Criminal and Civil Statutes (FICRO CONSPIRACY). The purpose of the FICRO CONSPIRACIES is to deprive Plaintiffs and those similarly situated of their rights, privilege, and immunities under the Constitution of United States by committing, causing, or contributing to, or ratifying each of the acts alleged against each DEFENANT.
- 1185. Defendants, and each of them, acted with specific knowledge of Plaintiff and PUBLIC BENEFIT ACTIVITIES.
- 1186. On information and belief, upon learning of each fact relating to Plaintiffs' PUBLIC BENEFIT ACTIVITIES, Defendants coordinated efforts, shared knowledge, and shared a common purpose with one or more of the other Defendants so as to be the agents of on another in FICRO CONSPIRACY to retaliate against, disparage, harm, injure, Plaintiff because of the same.
- 1187. In carrying out the FICRO CONSPIRACY, DEFENANTS committed, were aware of, acquiesced to, intended, and ratified each act and/or the acts and/or omissions of each other Defendant.
- 1188. Defendants are or were co-workers, collaborators, co-owners, cooperators, affiliates, colleagues, members of one another's personal and professional networks of one or more other of Defendants.
- 1190. Defendants, and each of them, in committing or conspiring to commit the acts ascribed to them CULPABLY acted in furtherance of the CRIMINAL CONSPIRACY, including the ENTERPRISES, entities, color of law, misfeasance and malfeasance ascribed to them herein.
- 1191. As an actual and foreseeable result, Plaintiffs have been damaged or injured in a nature and amount to be proven at trial.

PROSPECTIVE RELIEF COUNT 1

Declaratory Judgment Pursuant to 28 U.S.C. § 2201 Against All Defendants

1198. A case of actual controversy between Defendants and Plaintiffs exists with regard to Plaintiffs' free exercise, reform and support and advocacy of Family Federal Rights, laws, and Constitution of the Unites States, and the validity of state law conflicting therewith.

1199. Specifically, Plaintiffs, by virtue of their actions detailed herein, have asserted, and Defendants, by virtue of the Janice Jailing, MALICIOUS PROSECUTION, PROSECUTORIAL MISCONDUCT, and the operation of the ENTERPRISES with which they are affiliated, including their obstructive behavior described herein, have contested and denied, the following rights:

Rights to SUBSTANTIVE DUE PROCESS by CULPABLE and UNREASONBLE breach of PROFESSIONAL DUTY under color of law detailed above.

1200. Further, by similar means, DEFENANTS have asserted, and Plaintiffs have denied the legality of certain laws, practices, procedures, rules, and forms in Family Law matters as the right to property owed and moneys owed by virtue of lack of a property settlement and divorce attorney Ilona in her Scheme to steal from Janice using a lawyer not licensed in Virginia to steal.:

The processes, procedures, rules, customs, and practices of Virginia and their offices statewide; 1201. Plaintiffs respectfully request an Order declaring Plaintiffs' rights and other legal relations vis-à-vis Defendants' HARRASSMENT AND ABUSE and other deprivation of Family Federal Rights as follows:

Superior to any state laws which conflict, hinder, or deprive PLAINTFFS of the same.

That no Defendant acting under color of law is may to deprive any U.S. Citizen residing or present in the State of Virginia of Federal Rights by reliance on conflicting state law, even in good faith; That Defendants acting under color of law are not entitled to immunity under federal law for acts not specifically authorized by their constitutions, charters, or other foundational documents;

That all laws, rules, policies, regulations, and forms based thereon which conflict, hinder, or deprive Plaintiffs of their Federal Rights, including those specified herein, are unconstitutional, invalid, and unenforceable;

That the EQUAL PROTECTION CLASSES are valid classes of persons entitled to heightened protection under the 5th and 14th Amendments to the United States Constitution with regard to all Defendants;

That Defendants have violated each of the FICRO COUNTS as alleged against each of them hercin; and

That SUPERVISING DEFENANTS and MUNICIPAL ENTITIES behaviors, policies, and procedures depriving of or infringing on Federal Rights are illegal, unconstitutional, and deliberately indifferent to the likelihood of Constitutional injury to Plaintiffs:

1202. Plaintiff further request that the Court exercise its equitable powers pursuant to the Civil Rights Criminal and Civil Statutes and F.R.C.P. Rules 57 and 65 to enjoin defendants from:

Further deprivation of the Federal Rights;

Further HARRASSMENT AND ABUSE;

Further actions to solicit, prepare, file, petition for, issue, grant, or enforce Orders from Judge's that did not have Jurisdiction. ORDERS, forms, rules, advice, practices related thereto; and

Further interference with any Plaintiffs' and any United States Citizen's exercise and enjoyment of her United States Constitutional Rights

1203. Plaintiff Janice further requests the Court to exercise its equitable powers pursuant to the Civil Rights Criminal and Civil Statutes and F.R.C.P. Rules 57 and 65 to enjoin

WHEREFORE Plaintiffs pray for judgment as follows: An award of compensatory, punitive, exemplary, and enhanced damages and interest thereon according to proof at trial; That Plaintiff will be able to show a loss of \$100 Million or more from the Direct Actions of the Defendants.

An award of reasonable costs and expenses incurred in this action, including counsel fees and expert fees as allowable under the Title 18, 28, and 42 sections asserted;

Declaratory, Injunctive, and Prospective Relief as requested including injunctive remedies provided under 42 U.S.C. §§ 1983, 1985, 1986, 1988; and 18 U.S.C. §§1964 (a), (c), and (d); 28 USC 2201-2202; 15 U.S.C. § 1125, and related federal statutes;

The Basic Liberty of Due Process has been violated. The basic liberty that our Flag stands for and here is where the standard of Liberty is set for the rest of the World. It is under the Oath that each Judge has taken that this heavy burden lies on your shoulders to protect the Rights of each and every American Citizen. That the Appearance of Justice is just as important as Justice itself. That our young men and women are in harms way in many countries fighting for rights Janice has been raped of by the defendants. That as Americans if this is not taken very serious we will end up as Nazi Germany did. That jailing a Jewish person and taking away all there fundamental rights is how it started. What has happened here to Janice for being Catholic and poor is no different then how it started in Germany.

The result of this unusual absence of checks and balances has become a "perfect storm" of unchecked power, absence of meaningful oversight, and financially-motivated professionals who operate the system—lawyers, city/ county-level bureaucrats, none of whom are open to input from litigants. Litigants encounter the system as a revolving door process with short term goals. There is no longer term litigant-side **input to protect the legal and ethical integrity of the processes which deployed and policed by the system operators themselves**. The resulting exploitation ruins the American Citizen and there families while enriching attorneys, governments, elected officials and judges who administer the processes they, and they alone, created.

That the acts and actions were knowledgeable, willful acts malicious, violent, oppressive, fraudulent, wanton, or grossly reckless were done with an evil attempt to silence me first from collecting money and property (Real Estate) that is and was rightfully mine, from Divorce Lawyer Ilona Ely Freedman Grenadier Heckman active member of the Old Boys Network, then to silence me from exposing what was being done to me so that Senator Mark Warner could and would be re-elected. The acts and actions began on February 14, 1986, and became obvious to the inclusion of those below in September of 2007 and continue today. That I – Janice have a claim for these criminal and civil acts damages due me are Exemplary / Punitive, Compensatory, Consequential, Normal, Treble, Liquidated and Special Damages.

JURY TRIAL DEMANDED

Plaintiff incorporates by reference the allegations of paragraphs

Plaintiff demands a Jury Trial, pursuant to the Seventh Amendment to the United States Constitution. Along with the hearing to be filmed by a Camera man of the choosing of Plaintiff Janice.

I, Janice Wolk Grenadier, am the Defendant in this action. I personally set forth the allegations of fact in this Answer and Counter Claim Cross Complaint, and I hereby declare under penalty of perjury that each of said allegations is true and correct.

Date: November 12, 2015 Respectfully submitted,

/S/

Janice Wolk Grenadier
15 West Spring Street
Alexandria, Virginia 22301
Telephone (202) 368-7178
Email jwgrenadier@gmail.com

Attached List of Exhibits & Certificate of Service