

**IN THE UNITED STATES COURT  
WESTERN DISTRICT OF ARKANSAS**

**CURTIS J NEELEY JR, MFA**

**VS**

**CASE NO. 5:09-cv-05151**

**Joseph Stephen Breese Morse  
IAC/InterActiveCorp (IACI)  
ICANN Inc (ICANN)  
NAMEMEDIA INC  
Network Solutions LLC  
Google Inc (GOOG)  
Yahoo Inc (YHOO)  
Microsoft Corporation (MSFT)  
United States  
Federal Communications Commission (FCC)**

**Complaint for nonfeasance, trademark violations and privacy violations  
resulting in substantive defamations and US Title 17 Infringements as well as  
the unconstitutional Title 17 violating the Right to Due Process etc.**

Comes now the Plaintiff, respectfully and states for his complaint described as concisely as the severely brain-damaged, pro se litigant is able in this extremely complicated intellectual properties case including trademarks, Title 17 Infringements and repetitive public defamations and violations of “Due Process” and “Equal Access to the Law”. The tortuous actions are so numerous they prohibit concise titling or description. The severely brain injured Plaintiff is outraged by learning of the fraudulent business policies of the Defendants discovered while researching how his pre-teen daughter was exposed to Plaintiff’s original photos of the figure nude as an object of art on the Internet. The Courts call this a “new medium” that is apparently exempt from even moderate regulation in an obvious error that violates the intention of the Communications Act of 1934. The particular actions can be described as follows and are supported by the existing docket entries and will be further supported by witnesses and slide presentations during trial.

## **Defendant NAMEMEDIA INC list of intentional tortuous offenses**

1. Defendant NAMEMEDIA INC violated the Plaintiff's previously registered domains <eartheye.com> and <sleepspot.com> that were used in commerce with no purpose other than to sell them when they expired in 2003. This was at a time when the Plaintiff was an incompetent. This Lanham Act violation was subjected to a limitations ruling and dismissed originally. The Supreme Court ruled on May 24, 2010 that when torts continue to occur or one is repeated, the cause of action accrues from the last date of occurrence. This **reinstates** the trademark and Title 17 violations of Defendant NAMEMEDIA INC due to the yearly renewals of each domain until the early 2009 offer to the Plaintiff to encourage bidding on the expiring domain. When the Plaintiff was unable to pay the several thousand they sought, the Defendant advertised selling it for \$2,300 and at the same time accrued a \$100,000 statutory liability. The Plaintiff had advised NAMEMEDIA INC that <eartheye.com> was originally his and they ignored the Plaintiff outrageously and chose to sell the domain after having been advised and first involving legal Council of Erik Zilinek. Ted Olson alleged being contacted by the Plaintiff by telephone on some indeterminate date dishonestly before discussing the domain <eartheye.com> via email on Nov 29, 2007. Defendant NAMEMEDIA INC contacted the Plaintiff again on Jan 26, 2009 and Feb 13, 2009, and this lawsuit was started July 14, 2009. Defendant NAMEMEDIA INC violated <eartheye.com> and <sleepspot.com> annually when renewing the registrations rather than letting them expire and cease to resolve.

2. Plaintiff previously was trained in commercial photography and <eartheye.com> was the website used for his art. Plaintiff continued to do art photography as well as commercial photography and created a user profile at <photo.net> and uploaded some art while an incompetent or before recovering guardianship on January 26, 2006. The Plaintiff was never aware of the ownership of <photo.net>. Defendant NAMEMEDIA INC purchased <photo.net> in 2007. Defendant NAMEMEDIA stopped allowing users of the site to delete art and began to claim perpetual licensure to all users content. NAMEMEDIA INC alleged photos could be deleted but the Plaintiff soon discovered that was false and the Plaintiff began posting photos elsewhere. On a forum posting in July 2009, the Plaintiff posted that the new site owners would face him in Court and wished for them to delete his art. About July 24, 2009 Defendant NAMEMEDIA INC deleted Plaintiff's access to <photo.net> and yet continued preventing deletion of his user art, which was continually demanded.

3. Hannah Thiem, the “Digital Millennium Copyrite Agent” (DMCA) of Defendant NAMEMEDIA INC, was notified and ignored the Plaintiff but was relying on the Plaintiff’s disability and paralysis to make mailing notices nearly impossible. The Plaintiff notified Ms Thiem using an IP beacon to confirm delivery as well as using MySpace and Flickr social websites. The Plaintiff also signed up as a new user at <photo.net> and posted comments on the photographs asked to be deleted where a period was actually an IP beacon. Nearly all display of these images was then tracked, as evidence will show during TRIAL.

4. The Plaintiff had demanded that the art be removed repeatedly because it was art of the nude figure. The Plaintiff became aware that it was displayed to minors and was very likely to have caused his minor child’s outrageous communication of December 26, 2008. The Plaintiff’s severe traumatic brain injury, which once left him incompetent, is permanent. Curtis J Neeley Jr does not remember a daughter living with him prior to injury. Despite this fact, the Plaintiff loves her and sought diligently to be the best absent parent possible.

5. Curtis J Neeley Jr, MFA, believes that no minor, no atheist, and no practicing Muslim should be exposed to his figure nude art. Shortly after this lawsuit was entered, the Plaintiff realized that Defendant NAMEMEDIA INC and Defendant Google Inc operated an image search on <photo.net> that attributed nude photographs to him by name and displayed them to minors or any anonymous visitor while alleging plaintiff’s permission. This lawsuit was served on Defendant NAMEMEDIA INC but the attribution and display of nude art continued after the DMCA agent listed as Hannah Thiem had viewed the notice and she or NAMEMEDIA INC chose to ignore it.

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6. In January 2010, the Plaintiff discovered a new DMCA agent was listed for Defendant NAMEMEDIA INC. Plaintiff set out to repeat his monitored notification to get the images deleted expeditiously. Plaintiff researched the DMCA agent by wire and determined that the posted address was where Robb Rosell operated a website design business. Plaintiff contacted all disclosed clients of the DMCA and asked that they relay the notice regarding nude art being displayed against Plaintiff's wishes while allegedly being shown to minors by specific permission. Defendant NAMEMEDIA INC then finally deleted the pornographic photos and ceased attributing Plaintiff with "pornographic" art around January 24, 2010 as a result of the second DMCA notice. Plaintiff then stopped USING <namemedias.com> as a protest site since <photo.net> deleted the images Plaintiff USED <namemedias.com> to protest.

### **Defendant Google Inc repetitive domain name tortuous offenses**

7. Defendant Google Inc began Lanham Act violations of <eartheye.com> and <sleepspot.com> at some indeterminate date after the 2003 expiration of each registration. GOOG chose to license these domains in AdSense for Domains and acquired \$200,000 statutory liability that was also reacquired annually until <eartheye.com> was sold and until repetitive notifications that <sleepspot.com> was involved in TM litigation after the service of this action caused Google Inc AdSense for Domain to stop unmasked USE and reverting to stealth profiting they currently still do.

### **Detrimental reliance on Google Inc AdWords sales to fraudulent domains**

8. Defendant Google Inc sold advertisement to the Plaintiff in AdWords on domains it licensed exclusively for Google Inc AdSense for Domains and did not disclose the ads were run on deceptive domains they were "cybersquatting". This was a scheme to defraud and caused detrimental reliance. This was a fraudulent business policy used by Google Inc AdSense for Domains for scores of millions of dollars of unjust enrichment each year.

### **GOOG Defamation while claiming authorization during litigation**

9. Defendant Google Inc attributed Plaintiff's pornography with no concern for US Title 17 violations continually on <google.com> and on <photo.net> until Defendant NAMEMEDIA INC deleted the pornography after the second DMCA agent, Robb Rossel, caused them to finally be deleted on or after January 24, 2010.

10. Defendant Google Inc attributes the Plaintiff to pornographic art by image searches of his personal name from various websites where the Plaintiff had disclosed his art creation by choice and from images Plaintiff never had on his website as described more fully later. Google Inc allowed and now allows anonymous viewership of anything to support profits.

### **Google Inc re-publication of nude art scanned in a library**

11. After this lawsuit was filed and after Google Inc had filed an answer claiming the affirmative defense of failure of Plaintiff to mitigate damages on March 2010, Google Inc continued to expand their defamatory actions after Plaintiff's request to Amend on March 17<sup>th</sup>, 2010 where in Docket #111 # 1 Exhibit (Third Amended Complaint) in the Conclusion/Prayer section ¶ #2 on p. 18 the Plaintiff stated,

*“Plaintiff is an overlooked, outraged artist not part of the class in New York because his original photographic art is published in a book that was already seen at <Books.Google.com> and has a registered copyright from 2006 titled “The Renascent\ Vol. 3 Photography”.*

Plaintiff prepared an exhibit but forgot to include it. The omitted exhibit reveals only that, “No preview is available”, and had the wrong author listed. It revealed the distress of the Plaintiff as follows.

*Is this book scanned by Google already? My nude photography is in this book and I already sued Gogle for violating my copyrights and common law TMs. They say that if it is already copyrighted they will pay \$60 for violating the copyrights? I want 60 billion instead.*

12. The posted review above was deleted when Google decided to expand their defamation and this action causes outrage as well as demonstrating intentionally increasing their exposure and thereby showing disrespect for Court. Plaintiff has often shown poor attitudes since this action started but defaming an artists again while facing him in Federal Court for defamation is an admission of not considering this US Court Action sincerely enough to appoint an employee to mitigate the damages created and the opposing Counsel actually commented on the posted comment demonstrating being aware of this posting in the record.

## **United States unconstitutional Statute US Title 17**

13. The US Title 17 never acknowledged the fundamental moral right to attribution when it was first adopted in May 31, 1970 and disparaged the “Right to Attribution” when it was first created to establish a license to control publication of copies of original art. This impacts the Plaintiff continually and particularly when the Plaintiff is disclosed as the creator of art involving a nude photograph to an entirely anonymous viewer. It is recognized for South Koreans because of the “Berne Convention Implementation Act of 1988” and is therefore unconstitutional now for violating “Due Process” and “Equal Access to the Law” as well as the Ninth Amendment protection of moral rights to exclusively control attribution.

## **Federal Communication Commission nonfeasance**

14. The Federal Communications Commission (FCC) was created by the Communications Act of 1934 and given a statutory mission as follows:

*SEC. 2. (a) The provisions of this Act shall apply to all interstate and foreign communication by wire or radio and all interstate and foreign transmission of energy by radio, which originates and/or is received within the United States, and to all persons engaged within the United States in such communication or such transmission of energy by radio, and to the licensing and regulating of all radio stations as hereinafter provided; but it shall not apply to persons engaged in wire or radio communication or transmission in the Philippine Islands or the Canal Zone, or to wire or radio communication or transmission wholly within the Philippine Islands or the Canal Zone*

The FCC has been nonfeasant by not regulating transmission of energy used to communicate by wire since the Internet first developed. The Internet is nothing but the transmission of communications by wire as they have advanced. Early telegraph operators were the true pioneers of the Internet and were regulated by the FCC. The Internet developed into an international web of machines interconnected by wire for the purpose of telecommunication. The FCC had completely abandoned the statutory duty to regulate communications by wire. The Courts have held this is a “new medium” where reception of a message requires action on the receiver’s part or a request. This assertion by Court personnel is simply ridiculous failure to recognize the Internet as the logical development of telegraphs and telephone.

15. A telegraph wire conducts no communications without a receiver to translate the transmitted energy. The communications the FCC allows that involves pornography is transmitted continuously in case a receiver might accidentally answer the perpetually ringing phone. Typing “Curtis Neeley” can be conflated into answering the “cloud” transmission by wire being broadcast continually by every Search Engine Defendant by gathering the “Curtis Neeley” broadcast profiting them best when received by an anonymous receiver. All text have customized broadcasts done continually and compares to sunlight being broadcast. Sunlight affects the public but is still a “broadcast” of energy similar to the broadcast of “Curtis Neeley” that all American Search Engine Defendants do.

16. Perpetual nonfeasance of the FCC has impacted the Plaintiff continually when the FCC refuses to regulate communications by energy transmitted by wire or the FCC duty. The images the Search Engine Defendants each broadcast perpetually attribute art by the Plaintiff and falsely attributed to the Plaintiff involving nude figures or an erect penis image most would consider pornography that would not be allowed broadcast on television. These are available to any anonymous viewer by wire because of the FCC nonfeasance. The Children Online Protection Act (COPA) was ruled as overbroad by the Third Circuit Court as planned by Congress and because of FCC nonfeasance and failure of the FCC to attempt to explain Search Engine Broadcasts by wire to aging judges.

### **Search Engine Defendant’s repetitive tortuous offenses**

17. Search Engine Broadcasting Defendants continually broadcast nudity they each place in their “Curtis Neeley” broadcast while hoping an anonymous viewer will request it. Their “Curtis Neeley” broadcast attributes pornography to “Curtis Neeley” before anonymous receivers and avoids regulation via the nonfeasant FCC and is supported by the unconstitutional Title 17 failure to recognize the exclusive moral right to be attributed to art and especially for art displayed in a way that shames the artist. The owners of <Google.com>, <Yahoo.com>, <BING.com>, and <Ask.com> each broadcast pornography that the nonfeasant FCC would not allow transmitted on television. The owners are now named defendants.

18. The Search Engine Broadcasting Defendants use their “Curtis Neeley” broadcast and this use of the Plaintiff’s personal name, which is shared by his father, results in repetitive “attributions” to pornographic images in a manner that is outrageous defamation. Neither the Plaintiff, nor his father, condones broadcasting pornography to an anonymous viewer who refuses to take responsibility for the viewership of pornography.

## **Defendant Network Solutions LLC repetitive tortuous offenses**

19. Defendant Network solutions LLC first accrued a Lanham Act liability of \$200,000 when they advertised <eartheye.com>, and <sleepspot.com> in 2003. This Lanham act liability was dismissed due to limitations and remains excused because they have not advertised these domains while owned by the Plaintiff or prevented them from expiring as they would annually. Google Inc and NAMEMEDIA INC, however, repetitively tolled limitations until the last trespass for <eartheye.com> and <sleepspot.com>.

20. Network Solutions LLC would be dismissed and remain dismissed per the ruling of docket 126 if they had not trafficked <sleepspot.org>, <CurtisNeeley.com>, <Master-of-Photography.US>, <figurenude.com>, <OzarkPhotos.net>, and <Groupf16.org> to the Plaintiff in 2009 and 2010. This business policy of perpetually trafficking any domain creates a current Lanham Act statutory liability of \$600,000. The Network Solutions LLC fraudulent business policy was demonstrated in 2003 to be advertising expiration dates of domains they do not own. This arguably has been dismissed due to limitations for the 2003 actions. Liability will be increased in April 2011 when Network Solutions LLC advertises the expiration of <sleepspot.org> or causes the domain to be registered by another for no purpose of *bona fide* commerce. The Lanham Act Title 15 § 1125(d) mentions for the relevant portions:

*(B)(i)(VI) the person's offer to transfer, sell, or otherwise assign the domain name to the mark owner or any third party for financial gain without having used, or having an intent to use, the domain name in the bona fide offering of any goods or services, or the person's prior conduct indicating a pattern of such conduct;*

*(D)(1)(E) As used in this paragraph, the term "traffics in" refers to transactions that include, but are not limited to, sales, purchases, loans, pledges, licenses, exchanges of currency, and any other transfer for consideration or receipt in exchange for consideration.*

21. Network Solutions LLC has created evidence of a prior pattern of conduct while the registrar for the plaintiff of <eartheye.com> and <sleepspot.com> where they demonstrated treating expiring domains as a commodity to be offered for registration instead of quietly ceasing to display a website. In April 2011, when the Plaintiff's registration expires, it will be advertised or be allowed to be registered and will thereby create a \$100,000 statutory liability for trafficking for Network Solutions LLC. This is an impending certainty at this time.

## **ICANN Inc tortuous offense via schemes to defraud**

22. ICANN Inc has had a standing policy that any registrar may allow registration of previously registered domains without requiring transfers of “registration ownership” or requiring use for *bona fide* goods, services, free speech uses , or seeking licensure from the previous registrar. ICANN Inc thereby conspires with the Search Engine Broadcasting Defendants and the Domain Name Trafficking Defendants so that every short potentially easily typed domain has a value for Search Engine advertisers. By maintaining this fraudulent policy, ICANN Inc causes “parked” or fraudulent domains to have values to Google Inc AdSense for Domains not related to *bona fide* uses. ICANN does not include all similar domains with domains registered for commerce, and this causes typographical errors of registrations to have value. ICANN Inc provides the motive for the standing policy of Network Solutions LLC to offer the domain requested in different extensions that might result in confusion or registrations in order to prevent cybersquatting.

23. ICANN Inc does not allow a low cost challenge process whereby a domain that is used by Google AdSense for Domains or other to exclusively sell ads, like was done when this Plaintiff purchased advertising on “parked” or fraudulent sites, to result in voiding of the deceptively licensed site.

24. All domains registered by the Plaintiff must therefore be continually registered or become fraudulent domains used for accidental traffic. This creates demand for every domain the Plaintiff registered and does not allow for domains to simply expire and wait until the Plaintiff is able to complete the planned uses without paying annual fees.

## **Joseph Morse and Google Inc conspiracy to defame**

25. Joseph Morse conspired with Google Inc Books after March 7, 2010 and attributed Plaintiff correctly to three original figure nude art photographs shown to anonymous users including minors, atheists, and Muslims as is offensive and shames the Plaintiff and violates rights to privacy. The Plaintiff granted Joseph Morse permission electronically to place his photos in a book, which Mr Morse then did. Courts have ruled that publication of a book online requires a new authorization and the Google Inc fair-use argument has already been rejected in the Courts.

## **Continual Google Inc untruthful attribution and defamation**

26. Google Inc caused Michael Peven's erect penis photograph created by Mr Peven in 1979 to appear in a "strictly safe" image search for Mr Neeley's personal name. This continued for over a year after Google Inc outrageously claimed failure to mitigate damages by the Plaintiff as an affirmative defense. The erect penis photo has NEVER been on <curtisneeley.com> and the claim that it was shown there is both malicious, slanderous, and defamation that continues after numerous direct requests to Counsel and DEMANDS that this libelous fraud cease. The German Supreme Court recently allowed Google Inc to display thumbnails due to an implied permission and voluntary use of the robots exclusion protocol to control indexing.

27. This ruling will not stretch out to protect Google Inc in this litigation because the penis photo was never on <curtisneeley.com> as continually claimed. Outrage is an unpopular tort and Michael Peven's erect penis photo resulting in image searches for "Curtis Neeley" using even the "strict safe" settings are slanderous and defamatory in addition to being outrageous.

28. Michael Peven's erect penis photo result has been displayed very often, as evidence will show. The pornographic erect penis photo caused the public docket of (10-2255) to be locked from the public. Michael Peven's erect 1979 penis photo was and is falsely attributed to <curtisneeley.com> continually and adds to defamation and outrage especially since the page causing the erect Michael Peven penis photo thumbnail expresses detesting the photo as will be presented in evidence. This is an "implied" condemnation of the erect penis photo as well as condemnation of Michael Peven and does not imply permission to display Michael Peven's penis thumbnails.

## **Prayer for punitive, compensatory, and injunctive relief**

29. Whereas the Plaintiff has faced a tortuous swarm of activity, Plaintiff asks for Court ordered relief as follows to mitigate damages due to distress and to compensate for the distress as well as establishing preliminary injunctions to prevent the actions from recurring or continuing. In the interest of punishing the Defendants who all acted maliciously or recklessly when causing the damages, Plaintiff asks a Jury to establish a truly punitive award that could amount to more than scores of billions as well as finally requiring a revision of US Title 17 to recognize the fundamental moral right to attribution.

30. The Plaintiff seeks creation of a nonprofit Search Engine Alternative that does not violate US Title 17 after revised to acknowledge the Rights to Attribution and uses its income to offset taxes and is controlled by an elected board with board members representing the States based on population. Plaintiff asks that the jury assist in establishing a just compensation beyond his traumatic brain injured mind's abilities to imagine since a JURY award is not subject to being set aside or reduced for violating Due Process, as will be claimed.

31. Defendant Network Solution LLC who did not perhaps mean to distress but did so as a matter of policy should face an injunction to never advertise the expiration dates of any of the Plaintiff's domains. Statutory damages totaling \$600,000 for the offers of the Plaintiffs current domains might be sufficient punishment, but the jury will be asked to decide.

32. Defendant NAMEMEDIA INC who instigated this action and who acted very maliciously should face no less than 200,000 in statutory Lanham Act awards and no less than fifteen million dollar punitive award per domain violated. For the Defamation they instigated NAMEMEDIA INC should face a punitive award of not less than 150 million dollars and award of sleepspot.com as well as 1,000,000 for the malicious destruction of the sleepspot.com artwork and rights to the domain <photo.net> that was initially used to defame the Plaintiff.

33. Defendant Google Inc should face an enormous punitive award for a business policy of selling display of advertisements on "parked" or fraudulent sites licensed exclusively for Google AdSense for Domain. Compensatory awards for the damages would be insignificant for this Plaintiff alone but should be punitive as determined by a jury.

34. Defendant Google has a business policy of violating the fundamental exclusive right to attribution and do this to profitably traffic in pornography by search engine broadcasts since the FCC is nonfeasant and allow this where other countries do not. For the actions of defamation of the Plaintiff, Google Inc should face an injunction to return no nudes for any image search containing the name of the Plaintiff plus no less than 10 billion dollars for a punitive award considering their maliciously expanding defamation during this lawsuit.

35. The United States should face an injunction that the exclusive moral rights to attribution are recognized in Title 17 and all existing uses of the word "copyright" be recognized to now include the moral right to attribution previously intentionally missing.

36. Defendant Federal Communications Commission should face an injunction that no communication be allowed by wire that is not allowed on television to be consumed by anonymous viewers and requiring all future browsers to include an assertion that the viewer wishes to view pornography that is triggered by visitation of a properly coded site where IP visitation verification is always publicly accessible for a fee. The assertion would then remain activated until deactivated by the computer's administrator. **All websites should be required rated like movies via the robots exclusion protocol and extra-national websites would have the option to comply and ratings would be done voluntarily.** Ratings would be subject to FCC fines for not being applied or being applied inconsistent with existing movie standards for text or photographs.

37. Blocking of ALL pornography for each use of a computer would be ordered required for all users perpetually and "sneaking around" and looking at pornography on a computer provided by another who desires no pornography to be viewed by users of their computer is a trivial technical adaptation that must be required to stop uses like the recent SEC misuses of tax money for pornography consumption. The purchaser of a computer should be able to decide if it can ever be used to consume pornography. This alteration is extremely trivial and the FCC has likely realized this for decades already.

38. Defendant ICANN Inc should face injunctive relief that all similar domains be included with every new business use if requested and that all registrars be required to assert evidence of a transfer of registration from any registered domain. Registration expiration dates would never be disclosed except to the registering entity. This injunction would quickly end the fraudulent uses of all domain names and most need for Title 15 § 1125(d). ICANN Inc should also be directed never to include expiration dates except to registrants and not even during whois searches.

39. Owners of <Yahoo.com>, <BING.com>, <Ask.com>, and<Google.com> should be ordered to not return results not allowed returned by <lycos.com> for all uses of the Plaintiff's personal name as a **preemptive injunctive order** made unquestionably necessary during this litigation and maturing to become permanent.

40. Each Search Engine Defendant should be subjected to punitive awards for trafficking in pornography while aware that it was a malicious act opposed by most parents. This malicious trespass of moral rights of parent's to prevent children from encountering pornographic wire broadcasts, while unmonitored, took advantage of the obviously nonfeasant FCC. This warrants hundreds of BILLIONS for punishing each Search Engine Defendant for enormous profiting from inflicting this distress while pretending to respect privacy. This claim has been used to mean "cloud" broadcast pornography. Pornography is, therefore, the predominant use of the Internet in the United States. Punitive damages should be set by a JURY in light of profits due to this policy while recognizing that each Search Engine Defendant will claim the award violates Due Process although **half of the award will be paid in taxes** resulting in the Seventh Amendment finally applying to the States and unnamed class.

41. Joseph Morse and Google Inc should be subject to punitive damages of three thousand and three billion respectively or an amount the JURY deems adequate for digitally re-publishing Plaintiff's nude photographs from "*Renascant Vol 3 | Photography*" after this action had started and acknowledging Plaintiffs distress but maliciously ignoring it.

Whereas this litigation impacts WIRE COMMUNICATIONS now disguised as the Internet to avoid regulation and enable WIRE pornography now given the hallowed title "open internet", this one lawsuit demonstrates a need to order the FCC to regulate indecent wire communication as required by law since "invented". This action will impact the Internet more than anything since discovery of electricity and even this grandiose claim is not SPECULATIVE anymore than the claim that there exists only one **even** prime number is speculative. Only a JURY trial has the solid constitutional footing to require enforcement of laws and punish such violation as has been done to Curtis J Neeley Jr., MFA in this EXTREMELY complicated but closely related swarm of torts. Application of the Rule of Law is either logical or incorrect as should now be obvious.

Respectfully Submitted,

Curtis J Neeley Jr., MFA

# CERTIFICATE OF SERVICE

I hereby certify that today I will file a copy of the foregoing with the Court clerk for the United States Court in the Western District of Arkansas and the clerk will scan each document and it will be made into a B&W PDF and be available to all attorneys representing the Defendants for this case. Their Counsel will each receive notification from EM/ECF. The color PDFs that were printed from are accessible free to the public at <<http://www.CurtisNeeley.com/5-09-cv-05151/Docket>> immediately and perpetually by the end of the day.

**[CurtisNeeley.com/5-09-cv-05151/Docket](http://www.CurtisNeeley.com/5-09-cv-05151/Docket)**

/s/Curtis J Neeley Jr.  
Curtis J Neeley Jr, MFA