

Ronald D. Green, NV Bar #7360
Randazza Legal Group
3625 S. Town Center Drive, Suite 150
Las Vegas, NV 89135
702-420-2001
702-420-2003 fax
ecf@randazza.com

Attorney for Plaintiffs

MARC J. RANDAZZA, JENNIFER RANDAZZA, and NATALIA RANDAZZA

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARC J. RANDAZZA, an individual,)	Case No. 2:12-cv-2040-JAD-PAL
JENNIFER RANDAZZA, an individual, and)	
NATALIA RANDAZZA, a minor,)	DECLARATION OF MARC J.
)	RANDAZZA IN SUPPORT OF REPLY
Plaintiffs,)	TO CRYSTAL COX'S RESPONSE TO
)	ORDER TO SHOW CAUSE (ECF 169)
vs.)	
)	
CRYSTAL COX, an individual, and ELIOT)	
BERNSTEIN, an individual,)	
)	
Defendants.)	

**DECLARATION OF MARC J. RANDAZZA IN SUPPORT OF REPLY
TO CRYSTAL COX'S RESPONSE TO ORDER TO SHOW CAUSE (ECF 169)**

I, MARC RANDAZZA, having attained the age of 18, possessing personal knowledge of the matters set forth herein, and being competent to testify about them if called to do so at trial, state as follows:

1. I am a plaintiff in this action and a counter-defendant in Cox's counterclaim.
2. Attached as Exhibit A to this complaint is a true and correct copy of the *amicus* brief Martin Cain filed with the United States Court of Appeals for the Ninth Circuit in *Obsidian Finance Group LLC v. Cox*, Case No. 12-35238, Doc. # 56-2 (9th Cir. Feb. 26, 2014).

3. Exhibit A to Mr. Cain's brief contains the Montana Board of Realty Regulation's "Findings of Fact, Conclusions of Law, and Final Order" regarding Cox's actions toward Mr. Cain, which are virtually identical to the actions she has taken against me.

4. Exhibit B to this brief is a true and correct copy of Cox's blog post "Randazza Legal Group, Marc Randazza; 'Is Marc Randazza, Randazza Legal Group shaking down Porn Producers?'" which Cox posted to <http://unethicalscumattorney.blogspot.com/2014/03/randazza-legal-group-marc-randazza-is.html> on March 3, 2014. The attached copy of this blog post was created on March 12, 2014.

5. Exhibit C to this brief contains a true and correct copy of the blog post "Randazza Legal Group and Diane Duke of the Free Speech Coalition, also Connected to Kenneth P. White of Brown, White and Newhouse and Stalker Ari Bass aKa Michael Whiteacre us fraud on the courts, threats and bullying to silence whistle blowers in the porn industry..," which Cox published on <JosephRakofsky.com> on February 16, 2014. The attached copy of this blog post was created on March 11, 2014.

6. Additionally, this true and correct copy of Cox's website shows numerous uses of my personal name and my law firm's name as hyperlinks to other websites and blog posts that Cox operates and uses to post false, damaging statements about myself and Randazza Legal Group (Exhibit C at 1).

7. A true and correct copy of the domain name ownership report I created for all domain names registered by "Crystal Cox" on March 5, 2014 is attached to this brief as Exhibit D. This exhibit shows that "Crystal Cox" has registered 256 domain names under the name "Crystal Cox."

8. This report does not include domain names Cox registered under other aliases such as "Reverend Crystal Cox" and "Crystal L. Cox," and the total number of domain names Cox currently has registered – at recurring fees of \$10 per year – very likely is greater.

9. Attached as Exhibit E to this brief is a true and correct copy of a filing from *Obsidian Finance Group v Cox*, Case No. 3:11-cv-00057-HZ, Doc. # 115-1 (D. Ore. Jan. 30,

2012), which contains the following article: Curtis Cartier, *Comment of the Day: Why 'Non-Journalist' Crystal Cox Didn't Get a Lawyer*, Seattle Weekly (Dec. 7, 2011).

10. In the course of this litigation, I have been in phone communication with a man who identifies himself as Reverend John Collins. Mr. Collins, as he is known to me, has told me that Cox has repeatedly threatened him with the same actions she has taken against me in this case. I have been in communication with Mr. Collins for two years, and my understanding is that his fear – and Cox's threats – have persisted for that entire time. However, Mr. Collins has informed me that he is too afraid of Cox's retaliation – as she has threatened to take the same actions against him that she has used against me in this case, and against Kevin Padrick in the *Obsidian Finance* case – to come forward to discuss Cox's conduct on his own, or to stop sending her money.

11. In addition to cash payments, Mr. Collins reported to me that he pays Cox' rent, and provides material and financial support to Cox and her associates as well – including paying for Cox's cell phone service.

12. In a recent phone call, Mr. Collins claimed that he and other members of his church send Cox approximately \$4,000 per month, in order to protect them from Cox engaging in a similar campaign against Mr. Collins and his church. I have personally viewed proof of thousands of dollars of payments to and on behalf of Cox. I have attached true and correct receipts of \$2,400 in Western Union payments to Cox, which I have also personally reviewed, made on October 11 (\$200), 17 (\$200), and 23 (\$2,000), 2013, as Exhibit F, with minor redacted to remove banking and zip code information. However, it is my understanding that those payments frequently are made by cash deposits to Cox's bank accounts, and the bank accounts of her associates.

13. Mr. Collins further informed me that Cox has engaged in actions to evade the Court's orders by, for example, enlisting third parties to also register domain names such as <randazzanews.com>. While the domain name registration for this domain name reflects an "Alexandra Mayers" as the registrant, Mr. Collins informs me that the only person with access to the domain's control is Cox.

14. <RandazzaNews.com> contains a particularly offensive illustration of myself and a porn actress who is supposed to be my daughter, who is currently 5 years old, in the future. I have

1 attached a true and correct copy of this image, which I found on <RandazzaNews.com> on March
2 12, 2014, as Exhibit G. This comes as little surprise, as Cox's modus operandi appears to be
3 lodging attacks against children when her attacks upon their parents do not succeed.

4
5 I declare under penalty of perjury that the foregoing is true and correct to the best of my
6 knowledge.

7 Executed on March 12, 2014 in Las Vegas, Nevada.

8 Signed,

9
10 /s/ Marc J. Randazza

11 Marc J. Randazza
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28