

Crystal L. Cox  
Investigative Blogger  
Pro Se Defendant  
**Oregon Civil No. CV 11-0057 HZ**

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
Portland Division

OBSIDIAN FINANCE GROUP, LLC and  
KEVIN D. PADRICK, Plaintiffs

**Civil No. CV 11-0057 HZ**

Pro Se  
CRYSTAL L. COX, Defendant

**Demand for Statement of Declaration and Answers to  
Deposition Questions from Pro Se Defendant Crystal Cox  
to Marc Randazza, Witness for Plaintiff**

This legal document is to “Command”, “Demand” a Declaration under Oath of the Answers to the Following Questions from Marc Randazza of Randazza Legal Group, in conjunction with a Subpoena from David Aman, Tonkon Torp Law Firm on behalf of Obsidian Finance Group, Kevin Padrick, Plaintiff in Obsidian V. Cox. Oregon Civil Case Number CV 11-0057 HZ

This is Part One, More Questions to be Followed and to Be answered, Under Oath. Notarized and Signed by Marc Randazza of Randazza Legal Group.

**Questions for Marc John Randazza, Esquire**  
(Deposition Questions for Marc Randazza)

Did You, at any time conspire or discuss in any way the securing or ownership of the Domain Name **Marc Randazza .com** through any conversation, paperwork, emails, communications with Plaintiff Kevin Padrick, or Plaintiff’s Attorney David S. Aman of Tonkon Torp Law Firm ?

Did You, at any time discuss with Plaintiff Kevin Padrick, or Plaintiff’s Attorney David S. Aman of

Tonkon Torp Law Firm in regard to you, Marc Randazza or any Associate of yours owning the Domain Name Marc Randazza .com if you agreed to be Subpoenaed or Testify in regard to the Assets of Crystal Cox?

Did You initiate contact, at any time with Plaintiff Kevin Padrick, or Plaintiff's Attorney David S. Aman of Tonkon Torp Law Firm in regard to the Domain Name Marc Randazza .com and offer to Testify against Crystal Cox in any way?

Did You initiate contact, at any time with Plaintiff Kevin Padrick, or Plaintiff's Attorney David S. Aman of Tonkon Torp Law Firm in regard to any negotiations on behalf of a legal matter, lawsuit, judgement or case regarding Crystal L. Cox (Crystal Cox) ?

Marc Randazza, did you tell members of the First Amendment Bar that you Represented Crystal Cox?

Marc Randazza, did you tell any members of the First Amendment Bar that you were negotiate with the Plaintiff in Obsidian V. Cox to make some sort of agreement or financial settlement to make the Crystal Cox verdict go away?

Marc Randazza, what deal did you present to Tonkon Torp Law Firm David Aman, or the Plaintiff in any way in regard to the Obsidian V. Cox Case?

Marc Randazza, did you, at any time, contact the Plaintiff and attempt to negotiate a deal on behalf of Crystal Cox?

Marc Randazza, did you, at any time, contact the Plaintiff and attempt to negotiate a deal in regard to Obsidian V. Cox in ANY way?

Marc Randazza, Did you make any kind of deal or offer to make, negotiate a deal of ANY kind, via phone, email, text, letter or any other form of communication with Tonkon Torp Law Firm or David Aman, or Plaintiff Obsidian Finance Group or Kevin Padrick in any way, claiming that you represented Crystal Cox in any way?

Marc Randazza did you lead Crystal Cox to believe you were considering representing her to get information to take to the Plaintiff to negotiate a Deal and then NOT get back to Crystal Cox on this Matter?

Marc Randazza did you threaten Pro Se Defendant Crystal Cox that if she did not give you a Domain Name that you would make an Enemy of Her?  
.... IF so What Did you Mean By This?

Marc Randazza, Did you contact Tonkon Torp Law Firm or David Aman, or Plaintiff Obsidian Finance Group or Kevin Padrickin via phone, email, text, letter or any other form of

communication to offer to help Plaintiff in Obsidian V. Cox, in some sort of revenge regarding a personal feud, your personal Opinion of Crystal Cox or actions she took, or a personal vendetta that you had or have against Crystal Cox,?

Marc Randazza did you contact Plaintiff's Attorney David Aman of Tonkon Torp and offer to Give a Deposition in Regard to Crystal Cox, Pro Se Defendant in Obsidian V. Cox?

Marc Randazza can you provide this court with documentation of all communications between you and Plaintiff and or Plaintiff's Attorney?

Marc Randazza did you tell Crystal Cox that it did not bother you that she asked for a Job? ...if So why did you then go to the Plaintiff's Attorney and tell them differently?

Marc Randazza did you email Crystal Cox and tell her that you had nothing to do with her case and therefore she had no right to register a Domain Name resembling your Name?

Marc Randazza is it illegal to register a Domain Name with another Person's name included in the actual Domain Name ?

Marc Randazza is it illegal to email a prior associate or contact and ask for a job, or if they know anyone needing a particular service?

Marc Randazza did you have an attorney, client relationship with Crystal Cox at any time?

Marc Randazza did you say this to Crystal Cox, "I do not find it to be acceptable that someone else has registered my name for any purpose, and thus I can't possibly see any reason for you to have any control over that domain whatsoever -" ?

In your Expert Opinion, Does Crystal Cox have a legal and constitutional right to buy and own a domain name, with another person's name in the Domain Name?

Marc Randazza, what did you mean by this statement to Ms. Cox "I'm not interested in WIPO. You want to make an enemy of me, really?" ?

Marc Randazza did you make this statement to Ms. Cox, "You have no right to register a domain name that corresponds to my real name. Please hand that domain name over to me, and please do not presume to think it is okay to register other people's names as domain names."?

Marc Randazza did you represent Isaac Eiland-Hall in a WIPO Domain Name Dispute Regarding the domain name, [www.GlennBeckRapedAndMurderedAYoungGirlIn1990.com](http://www.GlennBeckRapedAndMurderedAYoungGirlIn1990.com) ?

Do you believe that Isaac Hall had a legal right to have registered and own the domain name [www.GlennBeckRapedAndMurderedAYoungGirlIn1990.com](http://www.GlennBeckRapedAndMurderedAYoungGirlIn1990.com) ?

Marc Randazza, did you argue, as legal counsel, the right for Isaac Eiland-Hall to own a domain name that corresponds to the real name of Glenn Beck?

Marc Randazza did you ever represent Crystal Cox as her Attorney?

Marc Randazza, Did you contact Tonkon Torp Law Firm or David Aman, or Plaintiff Obsidian Finance Group or Kevin Padrick via phone, email, text, letter or any other form of communication and discuss any personal information regarding your phone call, interview with Crystal Cox, leading Crystal Cox to believe you may represent her as Counsel in an Appeal for Obsidian V. Cox?

Marc Randazza did you ever tell anyone that you represented Crystal Cox as your Attorney?

Marc Randazza, Did you make any kind of deal via phone, email, text, letter or any other form of communication to or with Tonkon Torp Law Firm or David Aman, or Plaintiff Obsidian Finance Group or Kevin Padrick in any way, to assist in securing the Domain Name Marc Randazza .com ?

Did you, Marc Randazza, make a deal of any kind, that after the Plaintiff forcible secured the Domain Name Mark Randazza .com that you would get control or ownership of this Domain Name?

Marc Randazza, did you email Crystal Cox and Say, "Ok, you made your point. So what do you want? " If So, Marc Randazza, What did you Mean By this Email?

### **End of Questions to Marc Randazza Part One**

I, Pro Se Defendant Crystal Cox reserve the Right to Ask Marc Randazza more questions under Oath regarding the Deposition of Marc Randazza in the Obsidian V. Cox Case. It is my right of Due Process and my Constitutional Rights

Crystal L. Cox, Pro Se Blogger  
**Civil No. CV 11-0057 HZ**

**CERTIFICATE OF SERVICE**

**I hereby certify that I served the foregoing:  
Demand for Statement of Declaration and Answers to  
Deposition Questions from Pro Se Defendant Crystal Cox**

to Plaintiff Attorney David Aman, Tonkon Torp  
and to Marc Randazza, Witness,

At the Following Email Addresses  
on March 15th 2012

**To:** mjr@randazza.com

**With Copies To**

mary.costanzo@tonkon.com

david.aman@tonkon.com

steven.wilker@tonkon.com

And to the Oregon Courts and Electronic Filing  
at Email: Michelle\_Rawson@ord.uscourts.gov

Crystal L. Cox  
Investigative Blogger  
Defendant Pro Se  
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