

Crystal L. Cox
Pro Se Defendant
Case 2:12-cv-02040-GMN-PAL
SavvyBroker@yahoo.com

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
Case 2:12-cv-02040-GMN-PAL

Plaintiff, Marc J. Randazza

**Motion Requesting Protective Order
Defendant Crystal Cox and Sources
in Physical Danger, Harm from Plaintiff,
Counter Defendants and Co-Conspirators**

vs.

Crystal L. Cox and Eliot Bernstein, Defendants

I, Pro Se Defendant / Counter Plaintiff Crystal L. Cox request this court to Give me a Protective Order from Plaintiff and his Co-Conspirators. I have been threatened, stalked, intimidated and harassed. Exhibits show threats of taking out my kneecaps, of calling me foul names in relationship to coming to the town I Live in and saying "Bye Bye". I get taunting text messages, and have had online threats from Plaintiff and Co-Conspirators.

Plaintiff Marc Randazza threatened "Do you Really want to make an Enemy of me" and since then has systematically set out to destroy my life, threaten me, harass me, conspire with others to physically harm me, put me under extreme duress and keep me on constant guard from the threats of his co-conspirators.

Exhibit XXX shows Aggression and Threats.

Upon Belief and Knowledge, Defendant Crystal Cox and Defendant Eliot Bernstein's life is in danger, and so is the Life, Livelihood and Quality of life of Monica Foster Shelley Lubben, and Diana Grandmason aKa Desi Foxx. It is the **duty of this court** to issue protective orders to protect these individuals, especially from Ronald D. Greed, Marc J. Randazza, Kenneth P. Whites, Jason Jones, Ari Bass aKa Michael Whiteacre, Sean Tompkins, J. Malcom Devoy, Sean Boushie, and Jordan Rushie.

They continually threaten Defendant Crystal Cox, taunt Defendant Crystal Cox, gang stalk Defendant Crystal Cox, and email others to join them in their Hate Crime. I demand this court give me a protective order, and acknowledge that my life and the life of Eliot Bernstein, Monica Foster Shelley Lubben, and Diana Grandmason aKa Desi Foxx is in Danger. Should one of us turn up wounded, missing or dead, this court will be held accountable by those surviving. This is not a JOKE.

Upon Belief and Knowledge, The Plaintiff and his Co-Conspirators are connected to organized crime, to mafia and they have endless amounts of money and resources, they have thugs and stalkers on their payroll and the lives of those who speak out against them are in danger.

Upon Belief and Knowledge, Randazza Legal Group is well connected and DANGEROUS. This court Refuses to Admit or Deny Conflict and seems to be acting in Criminal and Civil Conspiracy with the Plaintiff, Co-Conspirators and Counter Defendant.

Upon Belief and Knowledge, Randazza Legal Group is conflicted in this lawsuit and must get outside Counsel. Randazza Legal Group is a named defendant. Randazza Legal Group Marc J. Randazza represented the Defendant Crystal Cox in other legal matters. Randazza Legal Group should NOT be representing themselves in suing investigative Blogger Defendant Crystal Cox.

Upon Belief and Knowledge, Randazza Legal Group Ronald D. Green use to Work at Greenberg Traurig and has massive conflicts of interest in suing Inventor Eliot Bernstein, and the Investigative Blogger getting Eliot Bernstein's technology theft story heard in the online media. Randazza Legal Group Ronald D. Green represents Liberty Media Holdings, as Does Marc J. Randazza, Randazza Legal Group. Liberty Media Holdings is infringing on the iViewit Patent and owes iViewit Technology 100s of Billions of Dollars, this is NOT an Exaggeration.

Upon Belief and Knowledge, Randazza Legal Group J. Malcom DeVoy is an attorney for a man named Sean Tompkins who has been stalking and threatening Monica Fosta aKa Alexandria Melody for years. Sean Tompkins recently posted, as seen in the Exhibits that he is coming to the town Defendant Crystal Cox lives in and Bye Bye Cunt Cox.

Upon Belief and Knowledge, Ronald D. Green, Randazza Legal Group J. Malcom DeVoy, Kenneth P. White, Marc Randazza and other Co-Conspirators are connected to a man named Ari Bass aKa Michael Whiteacre who is known to push Porn Industry Whistle Blowers to Suicide and even in connection with murders allegedly.

Plaintiff and Co-Conspirators are Committing a Hate Crime. The Hate Crime Prevention Act, Title 18, U.S.C., Section 241, Conspiracy Against Rights statute makes it unlawful for two or

more persons to conspire to injure, oppress, threaten, or intimidate any person of any state, territory or district in the free exercise or enjoyment of any right or privilege secured to him/her by the Constitution or the laws of the United States.

Ronald D. Green, Randazza Legal Group insists on a phone conference, a meeting regarding "discovery", Defendant Crystal Cox is in Danger of Ronald D. Green, Randazza Legal Group and refuses to allow him access to her in ANY way. Upon Belief and Knowledge, Ronald D. Green, Randazza Legal Group will harm, intimidate, injure, harass, taunt, physically harm and possibly KILL Defendant Crystal Cox, along with other named Co-Conspirators.

Defendant Crystal Cox and Defendant Eliot Bernstein have already lost massive, valuable intellectual property, domain names, blog content, and livelihood to do with actions of this court in UNCONSTITUTIONAL Preliminary Injunctions that have caused irreparable harm.

Defendants and their sources, have a right to protection from physical harm or death, by the powers of the Court.

Defendants and their sources, have a constitutional RIGHT to a Protective Order to Attempt to PROTECT Defendants and their sources from Physical Harm, Intimidation, Harassment, Economic Terrorism, Taunting, Gang Stalking and More Hate, Criminal and Civil Conspiracy.

I, Pro Se Defendant / Counter Plaintiff Crystal L. Cox request this court to Give me a Protective Order from Plaintiff and his Co-Conspirators.

NOTICE: It is a Federal Crime to FAIL to Admit or Deny Conflict

I, Pro Se Defendant / Counter Plaintiff Crystal L. Cox have requested this court sign a Conflict of Interest Disclosure admitting or Denying Conflict, this is my legal, constitutional, due process right. I, Pro Se Defendant / Counter Plaintiff Crystal L. Cox have attached yet ANOTHER Conflict of Interest Disclosure to this Motion requesting a Protective Order. Anyone who is handling **Case 2:12-cv-02040-GMN-PAL**, making any decision in this case in any way that affect Pro Se Defendant / Counter Plaintiff Crystal L. Cox or Defendant Eliot Bernstein MUST Read this Attached COI and Sign, MUST admit or Deny Conflict. Please Read Carefully as this COI is a bit different than previous Conflict of Interest Disclosure motions. And this COI Explains the LAWS clearly that you are Violating if you REFUSE to Admit or Deny Conflict.

Also, Please Note the Following Law, and PROTECT Pro Se Defendant / Counter Plaintiff Crystal L. Cox, Defendant Eliot Bernstein, and Porn Industry Insiders / Whistle Blowers Monica Foster Shelley Lubben, and Diana Grandmason aKa Desi Foxx in connection with **Case 2:12-cv-02040-GMN-PAL**.

["TITLE 18 > PART I > CHAPTER 73 > § 1512](#)

[Prev](#) | [Next](#)

§ 1512. TAMPERING WITH A WITNESS, VICTIM, OR AN INFORMANT

[How Current is This?](#)

(a)

(1) Whoever kills or attempts to kill another person, with intent to—

(A) prevent the attendance or testimony of any person in an official proceeding;

(B) prevent the production of a record, document, or other object, in an official proceeding; or

(C) prevent the communication by any person to a law enforcement officer or judge of the United States of information relating to the commission or possible commission of a Federal offense or a violation of conditions of probation, parole, or release pending judicial proceedings;

shall be punished as provided in paragraph (3).

(2) Whoever uses physical force or the threat of physical force against any person, or attempts to do so, with intent to—

(A) influence, delay, or prevent the testimony of any person in an official proceeding;

(B) cause or induce any person to—

(i) withhold testimony, or withhold a record, document, or other object, from an official proceeding;

(ii) alter, destroy, mutilate, or conceal an object with intent to impair the integrity or availability of the object for use in an official proceeding;

(iii) evade legal process summoning that person to appear as a witness, or to produce a record, document, or other object, in an official proceeding; or

(iv) be absent from an official proceeding to which that person has been summoned by legal process; or

(C) hinder, delay, or prevent the communication to a law enforcement officer or judge of the United States of information relating to the commission or possible commission of a Federal offense or a violation of conditions of probation, supervised release, parole, or release pending judicial proceedings;

shall be punished as provided in paragraph (3).

(3) The punishment for an offense under this subsection is—

(A) in the case of a killing, the punishment provided in sections [1111](#) and [1112](#);

(B) in the case of—

(i) an attempt to murder; or

(ii) the use or attempted use of physical force against any person; imprisonment for not more than 30 years; and

(C) in the case of the threat of use of physical force against any person, imprisonment for not more than 20 years.

(b) Whoever knowingly uses intimidation, threatens, or corruptly persuades another person, or attempts to do so, or engages in misleading conduct toward another person, with intent to—

(1) influence, delay, or prevent the testimony of any person in an official proceeding;

(2) cause or induce any person to—

(A) withhold testimony, or withhold a record, document, or other object, from an official proceeding;

(B) alter, destroy, mutilate, or conceal an object with intent to impair the object's integrity or availability for use in an official proceeding;

(C) evade legal process summoning that person to appear as a witness, or to produce a record, document, or other object, in an official proceeding; or

(D) be absent from an official proceeding to which such person has been summoned by legal process; or

(3) hinder, delay, or prevent the communication to a law enforcement officer or judge of the United States of information relating to the commission or possible commission of a Federal offense or a violation of conditions of probation [\[1\]](#) supervised release,,[\[1\]](#) parole, or release pending judicial proceedings;

shall be fined under this title or imprisoned not more than 20 years, or both.

(c) Whoever corruptly—

(1) alters, destroys, mutilates, or conceals a record, document, or other object, or attempts to do so, with the intent to impair the object's integrity or availability for use in an official proceeding; or

(2) otherwise obstructs, influences, or impedes any official proceeding, or attempts to do so,

shall be fined under this title or imprisoned not more than 20 years, or both.

(d) Whoever intentionally harasses another person and thereby hinders, delays, prevents, or dissuades any person from—

(1) attending or testifying in an official proceeding;

(2) reporting to a law enforcement officer or judge of the United States the commission or possible commission of a Federal offense or a violation of conditions of probation [\[1\]](#) supervised release,,[\[1\]](#) parole, or release pending judicial proceedings;

(3) arresting or seeking the arrest of another person in connection with a Federal offense; or

(4) causing a criminal prosecution, or a parole or probation revocation proceeding, to be sought or instituted, or assisting in such prosecution or proceeding;

or attempts to do so, shall be fined under this title or imprisoned not more than 3 years, or both.

(e) In a prosecution for an offense under this section, it is an affirmative defense, as to which the defendant has the burden of proof by a preponderance of the evidence, that the conduct consisted solely of lawful conduct and that the defendant's sole intention was to encourage, induce, or cause the other person to testify truthfully.

(f) For the purposes of this section—

(1) an official proceeding need not be pending or about to be instituted at the time of the offense; and

(2) the testimony, or the record, document, or other object need not be admissible in evidence or free of a claim of privilege.

(g) In a prosecution for an offense under this section, no state of mind need be proved with respect to the circumstance—

(1) that the official proceeding before a judge, court, magistrate judge, grand jury, or government agency is before a judge or court of the United States, a United States magistrate judge, a bankruptcy judge, a Federal grand jury, or a Federal Government agency; or

(2) that the judge is a judge of the United States or that the law enforcement officer is an officer or employee of the Federal Government or a person authorized to act for or on behalf of the Federal Government or serving the Federal Government as an adviser or consultant.

(h) There is extraterritorial Federal jurisdiction over an offense under this section.

(i) A prosecution under this section or section [1503](#) may be brought in the district in which the official proceeding (whether or not pending or about to be instituted) was intended to be affected or in the district in which the conduct constituting the alleged offense occurred.

(j) If the offense under this section occurs in connection with a trial of a criminal case, the maximum term of imprisonment which may be imposed for the offense shall be the higher of that otherwise provided by law or the maximum term that could have been imposed for any offense charged in such case.

(k) **Whoever conspires to commit any offense** under this section shall be subject to the same penalties as those prescribed for the offense the commission of which was the object of the conspiracy."

Attached to this Motion for Protection is Pro Se Defendant / Counter Plaintiff Crystal L. Cox's COI - Conflict of Interest Disclosure, REQUESTING this Court Admit or Deny Conflict.

Attached to this Motion for Protection is the iViewit Conflict of Interest Disclosure, it is the DUTY and Lawful Obligation of this Court to Sign these COI's and to admit or deny Conflict. It is literally life or death.

Respectfully Submitted By
Pro Se Defendant / Counter Plaintiff Crystal L. Cox

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed using this Court's CM/ECF system **On January 16th 2013** and a copy emailed Randazza Legal Group at eMail rdg@randazza.com and lmr@randazza.com

Respectfully Submitted

Pro Se Defendant

Crystal L. Cox

Case 2:12-cv-02040-GMN-PAL