

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, Counter Defendant Marc J. Randazza /

Reply to **RESPONSE to [60] First MOTION Requesting Court Notify
Investigators/Authorities Regarding Suspected Criminal Actions/Activities of Plaintiff
Marc Randazza and Counter-Defendants/Co-Conspirators**

v.

Defendant / Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein

I, Counter Plaintiff / Defendant Crystal Cox, filed a second notice to investigate because I realized that the court is obligated to, under law, notify authorities, and I had worded it differently the first time, in suggesting that the court investigate the Plaintiff and his Co-Conspirators. So I filed another motion requesting that the court NOTIFY authorities instead of investigate themselves, this was more Proper, under the Law.

**All Below is stated upon the knowledge and belief of Counter Plaintiff / Defendant
Crystal Cox.**

It is this court's legal duties under Judicial Canons, Laws of the United States, and the Constitution to Notify Investigators/Authorities Regarding Suspected Criminal Actions/Activities of Plaintiff Marc Randazza and Counter-Defendants/Co-Conspirators.

NOTICE TO THIS COURT:

This Court has DENIED requests to sign a conflict of Interest Disclosure, though requested several times by Pro Se Defendant / Pro Se Counter Plaintiff Crystal L. Cox. Any action forward by Judge Gloria M. Navarro or Judge Peggy A. Leen, who refuses to admit/deny conflicts and rules forward will be charged with Obstruction of Justice through conflicts of interest, violations of attorney and judicial cannons in order to Deny Due Process via aiding and abetting the alleged civil and criminal conspiracy through Fraud on the Court.

I, Defendant / Counter Plaintiff Crystal Cox BELIEVE, upon my personal knowledge, tips and belief that Plaintiff Marc Randazza and Counter-Defendants/Co-Conspirators are involved in illegal prostitution rings disguised as escort services, they sue individuals and companies to steal their brand or online content and get themselves a paycheck by force and Coercion tactics, they conspire with and possibly bribe judges, they conspire with attorneys on both sides of cases to shakedown their clients, they engage in internet mobbing to create massive online content that supports the outcome they want in legal cases and have the courts remove any “objective” content such as the investigative blogs of Crystal Cox; they conspire to silence the iViewit Technology story and thereby effectively stall the 100’s of Billions in liability to Co-Conspirators in illegally infringing on the iViewit Video Technology; they retaliate with whatever means necessary against whistleblowers and industry insiders to silence them; they are involved in gang stalking to paint whistleblowers, investigative bloggers, and insiders in false light; they abuse their powers attorneys and abuse the courts to remove competition for themselves and their clients in the search engines; they have conspired in the murder of missing Donny Long aKa Donald Carlos Seoane; they deceive the public in claiming they are experts in one area of law then suing in the opposite defense tactics; they bully their clients, they conspire in criminal endangerment; they conspire in Criminal Defamation in which brings direct and massive harm to their targets; and More.

It is this court’s Duty to REPORT Plaintiff Marc Randazza and Counter-Defendants/Co-Conspirators to the proper authorities.

Plaintiff / Counter Defendant Marc Randazza is engaged in constant vexatious conduct and should be sanctioned by this court.

Plaintiff / Counter Defendant Marc Randazza and Co-Conspirator Ronald Green should be sanctions, disbarred and reported to the authorities for indictment.

Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators are dangerous and ruin lives, and they are breaking the law. it is this court’s lawful duty to notify authorities and special prosecutors to investigate these matters.

Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators Defamed me, Defendant / Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein, Knowingly, WITH Actual Malice.

Plaintiff / Counter Defendant Marc Randazza acted as my attorney at one time, tried to run off other First Amendment Bar attorneys in representing me, Defendant Crystal Cox, case being Obsidian V. Cox and thereby used confidential information to harm me, Defendant / Counter Plaintiff Crystal Cox and should be sanctions, and summary judgement granted to Cox for Malpractice and Neglect.

Plaintiff / Counter Defendant Marc Randazza, cannot claim he did not negotiate on my behalf acting as my attorney, there is email record proof to him admitting he tried to negotiate a deal, and before he even signed an agreement with me, he was acting as my attorney per our Initial phone conference, and documents, strategies I gave him. Plaintiff / Counter Defendant Marc Randazza deceived me, irreparably harmed me and did so for over a year in conspiracy with others, even though he once acted as my attorney.

Clearly Plaintiff / Counter Defendant Marc Randazza wants to suppress my investigative blogs and silence my whistleblowing, reporting on the iViewit Technology that his clients are using.

Clearly Plaintiff / Counter Defendant Marc Randazza is violating my rights, I am a Media Defendant, I have personal experience with Plaintiff / Counter Defendant Marc Randazza. I have received tips for over a year regarding Plaintiff / Counter Defendant Marc Randazza and his co-conspirators. I report on Plaintiff / Counter Defendant Marc Randazza in my online media. And this court, in conspiracy with Plaintiff / Counter Defendant Marc Randazza wiped out that reporting, those blogs and domain names in an unlawful, unconstitutional preliminary injunction, which has caused me irreparable harm, I should be granted an immediate summary judgement on these easily proven matters.

Plaintiff / Counter Defendant Marc Randazza is acting in conspiracy, in a way that is dangerous to the public at large, and this court has a lawful duty to report Plaintiff / Counter Defendant Marc Randazza and all co-conspirators to the property authorities.

Thousands of Blogs report on the Activities of Plaintiff / Counter Defendant Marc Randazza. These blogs, news sites, videos, and websites use the name Marc Randazza and Randazza Legal Group, and Plaintiff / Counter Defendant Marc Randazza does not sue them to stop them. Plaintiff / Counter Defendant Marc Randazza does not like me exposing him, nor reporting on the experience I personally had and the tips I get on him, so he sues me and gets an unlawful, unconstitutional preliminary injunction which causes irreparable harm and wipes out my content, my blogs, my sites, without due process or first amendment adjudication.

This is selective prosecution, this is discrimination and this is a violation of my rights and the rights of Defendant Eliot Bernstein.

Judge Gloria M. Navarro has ruled on motions to NOT Remove herself from this case, though Counter Plaintiff / Defendant Crystal Cox has request her removal and filed Motions to such. I, Defendant / Counter Plaintiff Crystal Cox, request this court clearly spell out what laws allow a Federal Judge to rule on whether to recluse themself from a case, when requested to do so.

A Judges Recusal Decisions Should Be Transparent and Reviewable. I, Defendant / Counter Plaintiff Crystal Cox , request an official Ruling on this matter, of Recusing Judge Gloria Navarro. I, Defendant / Counter Plaintiff Crystal Cox request all laws used to grant or deny this motion.

The statute governing recusal – 28 U.S.C. § 455, also sets forth a number of specific circumstances which demand recusal such as when the judge has personal knowledge of the disputed facts, a personal bias concerning a party to the case, earlier involvement in the case as a lawyer or material witness, or a financial interest in any party or subject matter of the case. Judge Gloria M. Navarro has a duty to the public to obey the laws of the United States and to uphold the Constitutional Rights of All.

A recent Supreme Court case, *Caperton v. A.T. Massey Coal, Inc.*, provides an object lesson in the hazards of a self-policing judiciary, in which individual judges determine whether or not their impartiality can reasonably be questioned. In *Caperton*, West Virginia Justice Brent D. Benjamin received substantial campaign contributions made from the president of a company with an outstanding \$50 million judgment against it on appeal before the judge. Justice Benjamin denied three motions to recuse himself, and then voted in the 3-2 majority to reverse the judgment against the company.

A public opinion poll indicated that 67% of West Virginians doubted Justice Benjamin would be fair and impartial.

In 1945, Justice Black declined to recuse himself from *Jewel Ridge Coal Corp. v. Local 616*, and cast the deciding vote in a 5-4 verdict in favor of clients represented by his former law partner. In a motion for rehearing after the decision, Justice Black's participation in the case was challenged on the ground that the victorious litigants were represented by Black's former law partner. Despite this conflict of interest, Justice Black refused to recuse himself from the motion to rehear, resulting in a denial of the motion and an affirmation of the Court's decision. Justice Black's decision not to recuse was perceived as outrageous and was criticized by his fellow Justice, Robert Jackson.

***Jerrico Inc.*, 446 US 238, 242, 100 S.Ct. 1610, 64 L. Ed. 2d 182 (1980).**

"The neutrality requirement helps to guarantee that life, liberty, or property will not be taken on the basis of an erroneous or distorted conception of the facts or the law."

The above is applicable to this court by application of Article VI of the United States Constitution and *Stone v Powell*, 428 US 465, 483 n. 35, 96 S. Ct. 3037, 49 L. Ed. 2d 1067 (1976).

"State courts, like federal courts, have a constitutional obligation to safeguard personal liberties and to uphold federal law."

Also see RI Supreme Court Article VI and Canons 1, 2, and 3.B.6.

The United States Constitution guarantees an unbiased Judge who will always provide litigants with full protection of ALL RIGHTS. Therefore, Counter Plaintiff / Defendant Crystal Cox respectfully demands that Judge Gloria Navarro be Recused from **Case 2:12-cv-02040-GMN-PAL**

In 1972, Justice Rehnquist's failure to recuse himself from *Laird v. Tatum* caused such a stir that Congress amended the recusal statute. The case involved a challenge to the constitutionality of a Nixon Administration domestic surveillance program targeting American dissidents to the Vietnam War. Although Rehnquist had previously testified before Congress in support of the program and had substantial knowledge of and interest in the case, he refused to step aside from the case, and cast the deciding vote upholding the constitutionality of the program. The backlash to Rehnquist's non-recusal was strong that it encouraged Congress to amend the recusal statute to enact a stricter and more comprehensive framework.

In 2003, a prominent legal ethicist argued that Justice Breyer should have recused himself from *Pharmaceutical Research and Manufacturers of America v. Walsh*, in which an association of drug manufacturers, including three in which Justice Breyer held stock, brought suit challenging the constitutionality of state regulations aimed at keeping drug costs down for consumers. Some legal ethicists criticized Justice Breyer's decision not to recuse himself, despite his potential financial conflict of interest.

In 2004, just weeks after the Supreme Court granted certiorari in a public records case brought by the Sierra Club against then-Vice President Dick Cheney, Justice Scalia went duck hunting with Cheney and accepted a free ride on the Vice President's plane. Despite widespread public criticism questioning his appearance of bias in the case, Justice Scalia refused to recuse himself.

In a memorandum opinion denying the Sierra Club's motion to recuse, Justice Scalia wrote that he "would have been pleased to demonstrate [his] integrity" by disqualifying himself from the case, but nonetheless decided there was no basis for recusal. He then cast his vote in support of Vice President Cheney's position.

In 2011, the advocacy organization Common Cause filed a petition with the Department of Justice, requesting that it file a Rule 60(b) motion seeking the invalidation of last year's Citizens United v. FEC ruling on the basis that Justices Scalia and Thomas should have recused themselves.

The petition alleged the impartiality of both justices could reasonably be questioned under 18 U.S.C. § 455(a) due to their attendance at a closed-door retreat hosted by Koch Industries, a politically active corporation that supported and has benefited from Citizen United's dismantling of campaign finance laws.

Common Cause also alleges that Justice Thomas had an obligation to recuse himself under 18 U.S.C. § 455(b), due to a financial conflict of interest created by his wife's employment at Liberty Central, a conservative political organization that stood to benefit from unrestricted corporate donations made possible by Citizens United.

I, Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox intend to file criminal complaints against any officer of the court, including opposing counsel, who violates any law or ethical statutes in order to perpetrate the fraud through obstruction via conflicts, or has violated any law already in previous rulings affecting me, Pro Se Defendant, Pro Se Counter Defendant Crystal Cox.

Therefore every ruling of this court on a motion without conflict disclosure will be charged for each and every act in a criminal complaint, forthcoming.

Plaintiff and Co-Conspirators SHOULD not be above the LAW and they certainly should have to follow the UDRP Rules, and they CLEARLY Do not Follow the RULES and do whatever they want.

SHUT Down Massive Blogs because of a Last name of ONE MAN in one of the stories on a massive online media, by a blogger? Demanding all blogs, google accounts and anything connected to that name, is clearly unlawful and unconstitutional.

Judge Gloria Navarro is alleged by Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox to be acting in criminal and civil conspiracy with Plaintiff / Counter Defendant Marc J. Randazza and ALL Connected Co-Conspirators and Counter Defendants of District of Nevada Case 2:12-cv-02040-GMN-PAL and therefore this court has a duty to notify all applicable authorities, bond carriers, insurance carriers, AND State and Federal Auditors of the liability of this allegation in a Federal Court Proceeding.

Plaintiff / Counter Defendant Marc J. Randazza and Attorney Counter Defendant Ronald D. Green has repeatedly attempted to BLOCK due process of law and to Ignore the Constitutional Rights of Both Defendant Eliot Bernstein and Counter Plaintiff / Defendant Crystal Cox.

Plaintiff / Counter Defendant Marc J. Randazza and Attorney Counter Defendant Ronald D. Green files a Lawsuit against me, does not serve me, defames me over the lawsuit he filed in blogs and then accuses me of using my Complaint Answer and Counter Complaint as a way to "further" defame him, them. Yet they claim their case is about Trademark and Copyright and not Defamation. When clearly they have violated my First Amendment Rights repeatedly, in total disregard of the Law and the U.S. Constitution.

Plaintiff / Counter Defendant Marc J. Randazza and Attorney Counter Defendant Ronald D. Green Stole massive blogs and domain names from me and caused irreparable damage, before adjudicating the First Amendment implications of the issue at hand.

I, Crystal L. Cox, am a Media Defendant who is reporting on Plaintiff / Counter Defendant Marc J. Randazza and Attorney Counter Defendant Ronald D. Green and Marc Randazza negotiated on my behalf, acting as my attorney, at one time, and tried to run off other First Amendment Bar attorneys from representing me, in my Ninth Circuit Appeal of Obsidian Finance Group v. Crystal L. Cox.

Plaintiff / Counter Defendant Marc J. Randazza defended a man owning the domain name GlenBeckRapedandMurderedAYoungGirlin1990.com and said it was NOT a trademark violation, yet Plaintiff / Counter Defendant Marc J. Randazza SEIZES FuckMarcRandazza.com, MarcRandazzaParody.com, RandazzaLegalGROUPSucks.com, MarcRandazzaSucks.com and many more domain names that he does not approve of, and claims they are as Trademark violation.

There is clear Pattern and History, and it is this court's duty to inform authorities

In Rakofsky v. The Internet, Supreme Court of the State of New York; County of New York, Case Number 105573-2011, District of Nevada Case 2:12-cv-02040-GMN-PAL and District of Oregon CIVIL CASE 3:11-cv-00057-HZ, the Same Co-Conspirators have done the same things. There is pattern and history, such as needed in RICO Claims and it is this courts duty to report to all authorities, any known or suspected Fraud, Unlawful Activity.

I, Crystal L. Cox Allege that Plaintiff and Co-Conspirators / Counter Defendants are engaging in or connected to LA and Las Vegas Prostitution Rings, Connected to Gang Stalking and Intimidation of Industry Insiders, possible connected to the murder of Donald Carlos Seoane aKa Donny Long, beating women, intimidating whistle blowers, and involved in Internet Mobbing where by a gang of Attorneys, Journalists, Law Firms, and many connected in Big Media "stage" legal commentary on blogs and other media sources to create false false facts

Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators Defamed me, Defendant / Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein, with Actual Malice, as they had the FACTS that neither Counter Plaintiff Crystal Cox nore Defendant Eliot Bernstein were guilty of / nor convicted of Extortion. Yet they broadcast in Big Media, in WIPO Publishings, on massive blogs that both Defendant / Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein were Extortionists, and they have thereby caused Irreparable harm and massive backlash.

Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators Intentionally Defamed Defendant / Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein, in order to attempt to discredit information on the Online Media / Investigative Blogs of Crystal Cox, and to flat out have massive domain names, blogs and contents removed from the search engines in which drew attention to their illegal activities and connections to organized crime, prostitution rings, internet mobbing, domain name thefts, harassment, stalking, attorney client abuse and neglect, connections to human trafficking and exposing their clients for infringing on a 13 Trillion Dollar Video Technology, the iViewit Technology, Inventor Eliot Bernstein.

Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators intentionally Defame Defendant / Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein, to hided corruption and alleged illegal activity, yet do not want this court to notify authorities.

Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators attempt to hide behind **Times v. Sullivan AND Gertz v. Robert Welch, Inc. in order to say they can Defame** Defendant / Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein and have no Liability. However, Counter Defendants and Co-Conspirators Knowling published defamatory statements with 'actual malice,' against counter Defendant / Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein. **They had knowledge that the statements they were posting were false** and they went ahead with reckless disregard of whether they were false or not and posted these defamatory false statement. **Times v. Sullivan, Nov. 30 Op. at 5, 1 ER 39.**

Counter Plaintiff Crystal Cox cannot recover damages without proof that Counter Defendant was negligent and Counter Plaintiff Crystal Cox may not recover presumed damages absent of proof of actual malice as in *Gertz*, 418 U.S. at 347." *Id.* at 9, 1 ER 43. However, Clearly Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators had actual malice, they posted FALSE STATEMENTS knowing the information was false, and therefore cannot hide behind cases such as **Gertz, and Times V. Sullivan** as a reason, a defense to have defamed me, and to continue to Defame Defendant / Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein. This court SHOULD sanction, fine, and grant immediate summary judgement against Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators.

Rules, Ethics, Codes, and Laws.

Public Officers Law **SEC 73** Restrictions on the Activities Of Current and Former State Officers and Employees

Public Officers Law SEC 74 Code of Ethics

Conflicts of Interest Law, found in Chapter 68 of the New York City Charter, the City's Financial Disclosure Law, set forth in section 12-110 of the New York City Administrative Code, and the Lobbyist Gift Law, found in sections 3-224 through 3-228 of the Administrative Code.

TITLE 18 FEDERAL CODE & OTHER APPLICABLE FEDERAL LAW

Title 18 U.S.C. § 4. Misprision of felony. Whoever, having knowledge of the actual commission of a felony cognizable by a court of the United States, conceals and does not as soon as possible make known the same to some judge or other person in civil or military authority under the United States, shall be fined under this title or imprisoned not more than three years, or both.

A federal judge, or any other government official, is required as part of the judge's mandatory administrative duties, to receive any offer of information of a federal crime. If that judge blocks such report, that block is a felony under related obstruction of justice statutes, and constitutes a serious offense.

Upon receiving such information, the judge is then required to make it known to a government law enforcement body that is not themselves involved in the federal crime.

Title 28 U.S.C. § 1361. Action to compel an officer of the United States to perform his duty. The district courts shall have original jurisdiction of any action in the nature of mandamus to compel an officer or employee of the United States or any agency thereof to perform a duty owed to the plaintiff.

This federal statute permits any citizen to file a lawsuit in the federal courts to obtain a court order requiring a federal official to perform a mandatory duty and to halt unlawful acts. This statute is Title 28 U.S.C. § 1361.

, Judge Gloria M. Navarro has a duty to disclose conflict and to protect citizens from schemes such as the Plaintiff and Co-Conspirators are running, however, it seems upon the belief of Pro Se Crystal Cox that , Judge Gloria M. Navarro is acting in conspiracy with the Plaintiff instead of for the best interest of the public at large.

In the United States, when an officer of the court is found to have fraudulently presented facts to court so that the court is impaired in the impartial performance of its legal task, the act, known as "fraud upon the court", is a crime deemed so severe and fundamentally opposed to the operation of justice that it is not subject to any statute of limitation.

Officers of the court include: Lawyers, Judges, Referees, and those appointed; Guardian Ad Litem, Parenting Time Expeditors, Mediators, Rule 114 Neutrals, Evaluators, Administrators, special appointees, and any others whose influence are part of the judicial mechanism.

"Fraud upon the court" has been defined by the 7th Circuit Court of Appeals to "embrace that species of fraud which does, or attempts to, defile the court itself, or is a fraud perpetrated by officers of the court so that the judicial machinery can not perform in the usual manner its impartial task of adjudging cases that are presented for adjudication". Kenner v. C.I.R., 387 F.3d 689 (1968); 7 Moore's Federal Practice, 2d ed., p. 512, ¶ 60.23

In *Bulloch v. United States*, 763 F.2d 1115, 1121 (10th Cir. 1985), the court stated "Fraud upon the court is fraud which is directed to the judicial machinery itself and is not fraud between the parties or fraudulent documents, false statements or perjury. ... It is where the court or a member is corrupted or influenced or influence is attempted or where the judge has not performed his judicial function --- thus where the impartial functions of the court have been directly corrupted."

Counter Defendant Ronald Green flat out LIES, and commits fraud on this court saying “Defendant Bernstein’s use of MARC RANDAZZA in connection with his websites is likely to cause confusion as to the source and origin of Defendant’s services”

There is absolutely no way that a reasonable reader or a neutral Jury would ever see MarcRandazzSucks.com, FuckMarcRandazza.com, HypocriteMarcRandazza.com, TrollMarcRandazza.com, MarcRandazzaisALyingingAsshole.com, as a “confusing” or similar tradename. There is no way that those domain names would cause confusion as to the source and origin of the Services, Counter Defendant Ronald Green said that in a Default Judgement document to get Judge Gloria Navarro to grant him \$23,000 in LEGAL Fees and get his “Client”, his boss, Plaintiff Attorney Marc Randazza \$500,000. This is a Fraud on the Courts, an Obstruction of Justice and a Violation of OUR Constitutional Rights. These attorneys SHOULD lose their license and a Summary Judgement should be IMMEDIATELY granted to Defendant / Counter Plaintiff Crystal Cox.

Defendant Eliot Bernstein has NO Website Connected to the domain names in which Counter Defendant Ronald Green and Counter Defendant / Plaintiff Attorney Marc Randazza STOLE. Defendant Crystal Cox has blogs that were pointed to those domain names. And there is no way what so ever that there is “likely to cause confusion as to the source and origin” of “services” in regard to these and other domain names in connection with this case: MarcRandazzSucks.com, FuckMarcRandazza.com, HypocriteMarcRandazza.com, TrollMarcRandazza.com, MarcRandazzaisALyingingAsshole.com. There is a Clear, NON-Confusing Objective on those Domain Names in which no reasonable reader could EVER miss. And it has nothing to do with a confusing mark or confusing services.

Upon Belief and Knowledge of Pro Se Crystal Cox, Counter Defendant Ronald Green and Counter Defendant / Plaintiff Attorney Marc Randazza are involved in a scheme, a racket, an abuse of power, a fraud on the courts, as it is Clear, Obvious and Blatant that Defendant Crystal Cox HATES Marc Randazza and his corrupt, evil ways, therefore she is very vocal about this HATE, and her personal experience with Plaintiff Marc Randazza and his Co-Conspirators. And Defendant / Counter Plaintiff Crystal Cox also posts tips she gets from Industry Insiders, Sources, Whistle Blowers as she is MEDIA. There is no Trademark or “Mark” Violation and NO Reader would assume that I am trying to lure them in to sell a similar, commercial product or service. It is Obvious, Blatant and not Confusingly Similar in ANY way.

**Counter Defendant Ronald Green, on behalf of Counter Defendant / Plaintiff
Attorney Marc Randazza Says the following:**

“d. Defendant Bernstein’s use of Plaintiffs’ names in connection with his websites constitutes misappropriation, as Bernstein intended to profit from exploitation of their use.”

This is Fraud on the courts and a Flat out lie. As Eliot Bernstein did not own the Blog, and Counter Defendant Ronald Green, on behalf of Counter Defendant / Plaintiff Attorney Marc Randazza KNOWS this. Counter Defendant Ronald Green, on behalf of Counter Defendant / Plaintiff Attorney Marc Randazza KNOW that the blog content had NOTHING to do with Defendant Eliot Bernstein, yet, as an Intellectual Property and Trademark Lawyer, Law Firm, has flat out LIED to this court. They are, in no way attached to “his websites”. They are pointed to BLOGS of Defendant Crystal Cox. And Counter Defendant Ronald Green flat out lies in saying that Defendant Eliot Bernstein intended to profit from exploitation of use. Counter Defendant Ronald Green and his Co-Conspirators are the only ones making a profit from those blogs and domain names. That statement is fraud on the courts, Defendant Eliot Bernstein never had intent to profit, nor did he every commercialize or profit from ANY of those Domain Names.

“e. Defendant Bernstein intruded upon Plaintiffs’ seclusion when, as a co-conspirator with Defendant Crystal Cox, he published the names and photographs of Plaintiffs.”

This is Fraud on the courts and a Flat out lie. As Eliot Bernstein has NO Control over Crystal Cox’s Blogs, nor does Eliot Bernstein Own Crystal Cox’s Blogs. A Blog and a Domain Name are two very different Assets. Just as a Commercial Building and the Business who rents it. Ronald D. Green, as an Intellectual Property and Trademark Lawyer, Law Firm, knows this and has AGAIN committed fraud on the courts.

“f. Defendant Bernstein knowingly and willing conspired with Defendant Cox to commit overt acts which caused irreparable harm to Plaintiffs.”

This statement of Counter Plaintiff Ronald Green on behalf of Marc Randazza is defamatory, fraudulent and flat out lies in regard to Defendant Bernstein. Defendant Eliot Bernstein has no control over my blogs, my mouth, what I say or what I do in ANY way. I am TRULY independent Media. The Obsidian V. Cox docket is clear on why Eliot Bernstein got receivership of those domain names. He is not a Proxy or in conspiracy in any way, Counter Plaintiff Ronald Green on behalf of Marc Randazza has again LIED and committed fraud on the courts, with actual malice, knowingly, as the information is easily found and well documented in PACER. Also Plaintiff has had NO irreparable harm, NONE what so ever Proven to this Court.

“g. Should Defendant Bernstein’s use of Plaintiffs’ personal names continue, Plaintiffs will consider to suffer irreparable injury to their good will and reputation and for which an award of damages would be inadequate.”

This statement of Counter Plaintiff Ronald Green on behalf of Marc Randazza is FALSE. Every Citizen has a right to use a personal name, to gripe, to parody, to poke fun and / or to report the news and opinion in regard to that person. This statement of Counter Plaintiff Ronald Green on behalf of Marc Randazza violates the First Amendment RIGHTS of Crystal Cox and Eliot Bernstein. There is no irreparable injury to the good will and reputation of the Plaintiff, PERIOD.

h. Defendant Bernstein acted willfully in his infringement of Plaintiffs’ common law trademarks.”

This statement of Counter Plaintiff Ronald Green on behalf of Marc Randazza is FALSE. As Eliot Bernstein, as Counter Plaintiff Ronald Green knows full well, had no control over the BLOGS of Defendant Crystal Cox in ANY way. And Plaintiff has no Common Law Trademark.

Counter Plaintiff Ronald Green, Counter Defendant Marc Randazza and ALL other Counter Defendants and Co-Conspirators have acted in a manner as to remove information online in regard to the biggest technology theft in the world, involving and naming many of them and their clients.

Counter Plaintiff Ronald Green, Counter Defendant Marc Randazza and ALL other Counter Defendants and Co-Conspirators have defamed, harassed, violated, intimidated, stolen intellectual property, permanently removed online content, irreparably harmed, attacked, lynched, painted in false light and criminally endangered Defendant Eliot Bernstein and Counter Plaintiff / Defendant Crystal Cox.

Counter Defendant Ronald Green, on behalf of Counter Defendant / Plaintiff
Attorney Marc Randazza Says the following:

“IT IS FURTHER ORDERED that the current registrar and registry of the <fuckmarcrandazza.com>, <marcrandazzaisalyingasshole.com>, and <marcrandazzasucks.com> domain names shall immediately and permanently transfer the <fuckmarcrandazza.com>, <marcrandazzaisalyingasshole.com>, and <marcrandazzasucks.com>;”

Even though Counter Plaintiff Ronald Green, Counter Defendant Marc Randazza, WIPO, Godaddy, Judge Gloria M. Navarro and other Counter Defendants and Co-Conspirators have already stolen the names, redirected the services and removed the content from the search engines.

Relief Sought of this Court: Notify ALL applicable authorities, law enforcement, special investigators, FBI, Department of Justice, FTC, SEC, Attorney General, State Attorney Bar Associates that Apply, Financial Crime Investigators, WIPO, UDRP Officials, ICANN - UDNDRP, INTERPOL any International Investigators that apply, shall be notified by this court as this court has knowledge of suspected criminal activity of Plaintiff / Counter Defendant Marc J. Randazza and ALL Connected Co-Conspirators and Counter Defendants.

I, Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox, DEMAND, that the court contact investigators to investigate Plaintiff / Counter Defendant Marc J. Randazza and ALL Connected Co-Conspirators and Counter Defendants regarding alleged criminal and civil conspiracy activities.

I, Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox, DEMAND, that Judge Peggy A. Leen and Judge Gloria M. Navarro, act according to Law, to Judicial Cannons, Ethics, Codes and Constitutional Law and Notify Authorities of activities of Plaintiff / Counter Defendant Marc J. Randazza and ALL Connected Co-Conspirators and Counter Defendants regarding alleged criminal and civil conspiracy activities.

I, Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox, DEMAND, that Judge Peggy A. Leen and Judge Gloria M. Navarro abide by Public Officers Law SEC 73, Public Officers Law SEC 74 Code of Ethics, TITLE 18 FEDERAL CODE, Title 18 U.S.C. § 4., Title 28 U.S.C. § 1361, Title 28 U.S.C. § 1361, and other applicable laws, ethics and Judicial Cannons, Notify Authorities of activities of Plaintiff / Counter Defendant Marc J. Randazza and ALL Connected Co-Conspirators and Counter Defendants regarding alleged criminal and civil conspiracy activities.

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Rules, Ethics, Codes, and Laws.

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Conflicts of Interest Law, found in Chapter 68 of the New York City Charter, the City's Financial Disclosure Law, set forth in section 12-110 of the New York City Administrative Code, and the Lobbyist Gift Law, found in sections 3-224 through 3-228 of the Administrative Code.

TITLE 18 FEDERAL CODE & OTHER APPLICABLE FEDERAL LAW

Title 18 U.S.C. § 4. Misprision of felony. Whoever, having knowledge of the actual commission of a felony cognizable by a court of the United States, conceals and does not as soon as possible make known the same to some judge or other person in civil or military authority under the United States, shall be fined under this title or imprisoned not more than three years, or both.

A federal judge, or any other government official, is required as part of the judge's mandatory administrative duties, to receive any offer of information of a federal crime. If that judge blocks such report, that block is a felony under related obstruction of justice statutes, and constitutes a serious offense.

Upon receiving such information, the judge is then required to make it known to a government law enforcement body that is not themselves involved in the federal crime.

Title 28 U.S.C. § 1361. Action to compel an officer of the United States to perform his duty. The district courts shall have original jurisdiction of any action in the nature of mandamus to compel an officer or employee of the United States or any agency thereof to perform a duty owed to the plaintiff.

This federal statute permits any citizen to file a lawsuit in the federal courts to obtain a court order requiring a federal official to perform a mandatory duty and to halt unlawful acts. This statute is Title 28 U.S.C. § 1361.

FRAUD on the COURT

In the United States, when an officer of the court is found to have fraudulently presented facts to court so that the court is impaired in the impartial performance of its legal task, the act, known as "fraud upon the court", is a crime deemed so severe and fundamentally opposed to the operation of justice that it is not subject to any statute of limitation.

Officers of the court include: Lawyers, Judges, Referees, and those appointed; Guardian Ad Litem, Parenting Time Expeditors, Mediators, Rule 114 Neutrals, Evaluators, Administrators, special appointees, and any others whose influence are part of the judicial mechanism.

"Fraud upon the court" has been defined by the 7th Circuit Court of Appeals to "embrace that species of fraud which does, or attempts to, defile the court itself, or is a fraud perpetrated by officers of the court so that the judicial machinery can not perform in the usual manner its impartial task of adjudging cases that are presented for adjudication". *Kenner v. C.I.R.*, 387 F.3d 689 (1968); 7 Moore's Federal Practice, 2d ed., p. 512, ¶ 60.23

In *Bulloch v. United States*, 763 F.2d 1115, 1121 (10th Cir. 1985), the court stated "Fraud upon the court is fraud which is directed to the judicial machinery itself and is not fraud between the parties or fraudulent documents, false statements or perjury. ... It is where the court or a member is corrupted or influenced or influence is attempted or where the judge has not performed his judicial function --- thus where the impartial functions of the court have been directly corrupted."

What effect does an act of "fraud upon the court" have upon the court proceeding? "Fraud upon the court" makes void the orders and judgments of that court.

I, Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox, DEMAND, that this court NOTIFY all appropriate authorities regarding all criminal and civil conspiracies alleged in ALL documents, Motions, Replies, Response of Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox in DISTRICT OF NEVADA Case 2:12-cv-02040-GMN-PAL.

I, Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox, DEMAND, that this court NOTIFY all appropriate authorities regarding all but not limited to the following:

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding the Life Endangering, Economic Terrorism, Criminal Conspiracy, Stalking, Selective Prosecution, Criminal Endangerment Harassment of Plaintiff Marc Randazza and Connected Parties.

As an Investigative Blogger, I, Pro Se Defendant Crystal L. Cox have a legal, ethical and moral duty to file this motion in protection of the Public At Large. I, Investigative Blogger, Pro Se Defendant Crystal L. Cox receive tips, and have personal experience, knowledge with and regarding to Plaintiff Marc Randazza and his Cult of Stalkers, Attorney Friends - Bloggers who harass, intimidate, threaten, pressure, ruin the career of, financial ruin, sabotage their own clients as well as those in the Porn Industry who expose them, are whistle blowers, insiders warning the Public of what Marc Randazza and those he is in Criminal and Civil Conspiracy with.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding the connections, conflicts of interest with the following online media, in conspiracy with Plaintiff Marc Randazza to threaten whistleblowers and insiders, intimidate them, murder them, put them under massive suicidal duress, set them up, stalk them, threaten their families, and a number of other intimidating and life endangering tactics.

The Following is a List of known PR, Media, Attorney Bloggers, Journalist who are involved in Criminal and Civil Conspiracy with Marc Randazza. I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger Demand that this Court Investigate these individuals in connections with Plaintiff Marc Randazza and using media, blogs, to threaten, harass, and intimidate whistleblowers aKa whistleblower retaliation.

Bob Garfield NPR, Kashmir Hill Forbes, Jordan Rushie Philly Law Blog, David Carr New York Times, Kenneth P. White Popehate.com, Jason Jones SaltyDroid.info, **SiouxieLaw.com**, **Sequencelnc.com** Tracy Coenen, and John and Jane Doe's to be added to this Federal Investigation at a later date.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding the connection of Righthaven Receiver Lara Pearson with Plaintiff Marc Randazza and Opposing Counsel in Obsidian V. Cox.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger Demand that this Court send all information, documents, exhibits of this case to the FBI, Department of Justice, SEC, Nevada Attorney General, California Attorney General, Washington Attorney General, U.S. Attorney General, FCC and there be an Investigation into the Criminal and Civil Conspiracy involving Plaintiff Marc Randazza.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding the Mafia and other Organized Crime Connections connected to Plaintiff Marc Randazza.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding the murder of Donny Long, and associated Criminal and Civil Conspiracy.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding the Godaddy Inc. in Civil and Criminal Conspiracy with Plaintiff Marc Randazza to steal intellectual property, redirect massive online content worth millions and Civilly and Criminal Conspiracy with Plaintiff Marc Randazza to deceive Godaddy Clients and to intimidate, harass, and place those clients under extreme duress, and violate their criminal, civil and constitutional rights.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding the Civil and Criminal Conspiracy with Plaintiff Marc Randazza to suppress information regarding the iViewit Stolen Technology. And I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger Demand that this Court investigate Proskauer Rose Law Firm, Kenneth Rubenstein, Hon. Judith Kaye, Peter L. Michaelson, MPEG LA, and all related parties, John and Jane Doe's to be added to this investigation.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding the car bombings of the iViewit Inventors, and the attempted murders associated with the iViewit Technology Case, Founder, Inventors and Connected Parties.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding the theft of the iViewit Technology.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding the technology rights infringement in the iViewit Technology Case, as this directly relates to this Nevada Case and it's Counter Defendants and Co-Conspirators.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding the Criminal and Civil Conspiracy of Plaintiff Marc Randazza, the INTA, WIPO and WIPO Panelist Peter L. Michaelson.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding Plaintiff Marc Randazza in Criminal and Civil Conspiracy with working with "Opposing Counsel" in cases, in such a way that financial harms both of their clients. They use blogs, and the courts to create illusions, drage cases out, win, lose or settle the attorneys on BOTH sides get paid. Plaintiff Marc Randazza is in Criminal and Civil Conspiracy to "shakedown" clients on both sides, and acts in conspiracy with the Nevada Court and Nevada Receivers to carry this out. In this regard I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger Demand that this Court investigate Plaintiff Marc Randazza in Criminal and Civil Conspiracy with Judge Gloria M. Navarro as in the freezing of accounts and enforcing attorneys paid in the Righthaven case and in conspiracy with Receiver Lara Pearson.

Upon Knowledge and Belief, Plaintiff Marc Randazza has acted in Criminal and Civil Conspiracy with Tonkon Torp Law Firm and Las Vegas Attorney Lara Pearson to be the forced "Receiver" in Obsidian V. Cox. Plaintiff Marc Randazza in Criminal and Civil Conspiracy with Judge Gloria M. Navarro to work with Plaintiff Marc Randazza in wiping out massive online content of Defendant Crystal L. Cox, Pro Se Defendant, Investigative Blogger.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding the violation of Due Process Rights, Civil Right, Constitutional Rights and Abuse of Power by Plaintiff Marc Randazza and Officials of this Court.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding Plaintiff Marc Randazza's in Criminal and Civil Conspiracy with Tonkon Torp Law Firm and Lawyer David S. Aman, Steven Wilker, Obsidian Finance Group, Kevin D. Padrick, David W. Brown, Todd Gregory and Patricia, Patty Whittington. I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger Demand that this Court investigate Plaintiff Marc Randazza conspiring to Sabotage Defendant Crystal Cox's Ninth Circuit Appeal by aiding and abetting David S. Aman to harass Defendant Crystal Cox, take her right to appeal with the legal advice of Plaintiff Marc Randazza who was Defendant Crystal Cox attorney at one point. Plaintiff Marc Randazza conspiring to Sabotage Defendant Crystal Cox New Trial Motion, in a criminal and civil conspiracy with Judge Marco Hernandez and Tonkon Torp Law Firm. I, Defendant Cox demand this be investigated by the property authorities.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding Plaintiff Marc Randazza in connection to Manwin, Corbin Fisher, Liberty Media and other Porn Industry Giants, in Criminal and Civil Conspiracy to intimidate Defendant Crystal Cox to DROP her Ninth Circuit Appeal of Obsidian V. Cox. IN order to protect the criminal and civil conspiracy of Manwin, Corbin Fisher, Liberty Media and other Porn Industry Giants in their infringement on the iViewit Technology. I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger Demand that this Court investigate Liberty Media in conjunction with Billions of Dollars owed to Defendant Eliot Bernstein and the iViewit Technology Company.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding Plaintiff Marc Randazza in Criminal and Civil Conspiracy with Doug Chey, Movielink, Sony Pictures, Metro-Goldwyn-Mayer, Paramount Pictures, Sony Pictures Entertainment, Universal, Warner Bros, Best Buy, MovieFly LLC, Global Digital Media Group, Blockbuster, Sony John Calkins, David Colter, Chuck Dages, Todd Outten, Scott Sherr, Silicon Graphics, Douglas Chey, Michael Arrieta, Blockbuster, and John and Jane Does, to be added to this investigation, Conspiring to steal, infringe on the iViewit Video Technology and to have blogs, "News" removed from the Internet to protect these individuals.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding Plaintiff Marc Randazza in Criminal and Civil Conspiracy with a ring of bloggers with the goal to intimidate, harass, and control the court case of their victims; as well as to pressure the silence of whistle blowers, porn industry insiders and Investigative Bloggers.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding Plaintiff Marc Randazza in Criminal and Civil Conspiracy with WIPO, Francis Gurry WIPO Director, Peter L. Michaelson WIPO Panelist.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding the Plaintiff Marc Randazza in Criminal and Civil Conspiracy with MPEG LA, Proskauer Rose Law Firm, Kenneth Rubensteins and John and Jane Doe's, to suppress the iViewit Technology story.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding the Plaintiff Marc Randazza in Criminal and Civil Conspiracy with aiding and abetting the iViewit Technology Theft.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding the Plaintiff Marc Randazza in Criminal and Civil Conspiracy with Kenneth P. White of PopeHat.com and threats to break the legs of Defendant Crystal Cox.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding the online posts of Sean Tompkins and Ari Bass aKa Michael Whiteacre as to posting threats of violence to Defendant Crystal Cox and to Monica Foster, and posting threats of coming to the hometown of Crystal Cox and "Bye Bye" along with other vicious threats.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding Plaintiff Marc Randazza in Criminal and Civil Conspiracy with Manwin, Manwin Licensing in Stealing Domain Names, Racketeering, Copyright and Trademark Trolling Violations, Stealing Online Content and Domain Names without First Amendment Adjudication, Filing Frivolous SLAPP Lawsuits to intimidate and silence Defendants and STEAL their Intellectual Property, Content and Domain Names.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding Plaintiff Marc Randazza in Criminal and Civil Conspiracy with attempting to shut down Defendant Crystal Cox's business, livelihood, blogs, investigative reporting and thereby participating in Criminal Endangerment of Defendant Crystal Cox and wiping out competition in the search engines with unlawful conspiracy.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding Plaintiff Marc Randazza in violations of Anti-Trust Laws in connection with Godaddy, and this Court in Criminal and Civil Conspiracy to remove competition in the search engines, to violate fair trade laws, restrain trade, harass and intimidate competition, and to shut down Defendant Crystal Cox as well as to Set up Defendant Crystal Cox for a Crime.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding Plaintiff Marc Randazza in Criminal and Civil Conspiracy with J. Malcom Devoy, Sean Tompkins and other John and Jane Doe's to be added this investigation in regard to stalking, intimidating, harassing, threatening, and attempting to silence the investigative blogs of Monica Foster / Alex Melody.

Monica Foster / Alex Melody' blogs are PornNewsToday.com, MonicaAtHome.com, ChristianPornStar.com, PornWorthWatching.com, MonicaF.com, PornStarHookerAlert.com, and are hereby included as evidence into this case in their entirety.

These blogs, websites in their entirety are hereby entered into this case as evidence.

This court is demanded to print out these blogs in their entirety for evidence to be included in this case.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding Plaintiff Marc Randazza in Criminal and Civil Conspiracy with J. Malcom Devoy, Sean Tompkins, Corbin Fisher, Manwin, Liberty Media and other John and Jane Doe's in connection with stalking, intimidating, harassing, threatening, and attempting to silence the investigative blogs of Diana Grandmason aKa Desi Foxx.

Diana Grandmason aKa Desi Foxx's blogs are FoxxMediaGroup.com, AmericanSatanism.com, PornInTheValley.com, MomsAgainstMedia.org, PornPimpingPolitics.com, and are hereby included as evidence into this case in their entirety. These blogs, websites in their entirety are hereby entered into this case as evidence. This court is demanded to print out these blogs in their entirety to preserve evidence in this case, and on going criminal and civil investigations.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding Plaintiff Marc Randazza in Criminal and Civil Conspiracy with J. Malcom Devoy, Sean Tompkins, Corbin Fisher, Manwin, Liberty Media and other John and Jane Doe's in connection with stalking, intimidating, harassing, threatening, and attempting to silence the whistle blowing, blogs, speaking out of Shelley Lubben. <http://www.ShelleyLubben.com/> **in it's entirety is hereby entered into this case as evidence.** This court is demanded to print out every page of this blog, website to preserve evidence in this case, and on going criminal and civil investigations.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding Plaintiff Marc Randazza in Criminal and Civil Conspiracy with J. Malcom Devoy, Sean Tompkins, Corbin Fisher, Manwin, Liberty Media and other John and Jane Doe's in connection with stalking, intimidating, harassing, threatening, and attempting to silence the whistle blowing, blogs, speaking out of Annie Lobert. <http://hookersforjesus.net/> and <http://www.iamsecond.com/> **in it's entirety is hereby entered into this case as evidence.** This court is demanded to print out every page of this blog, website to preserve evidence in this case, and on going criminal and civil investigations.

Plaintiff Marc Randazza is a dangerous, well connected attorney, and is not above any kind of personal or financial harm. It is this court's duty to take action and investigate Plaintiff Marc Randazza. I am an investigative journalist with knowledge of this information and demand that this court investigate Plaintiff Marc Randazza.

I, Crystal L. Cox, Pro Se Defendant, Investigative Blogger, Demand that this Court Notify Authorities Regarding Plaintiff Marc Randazza in Criminal and Civil Conspiracy with Proskauer Rose Law Firm, Kenneth Rubenstein, Peter L. Michaelson, Warner Bros., Corbin Fisher, Manwin, Liberty Median, Encore, Starz, Viacom, ATT, Apple, Roxanne Grinage, HireLyrics, Steve Dowling, Bruce Sewell, Phil Schiller, Peter Oppenheimer, Tim Cook, Paul Otellini, Jeffrey Bewkes, Time Warner Inc., Matthew Triggs, Foley and Lardner Law Firm, Gregg Mashberg, Allen Fagin, Kenneth P. White, Blockbuster, H. Wayne Huizenga, Judge Judith Kaye, Christopher Wheeler, William Dick, Intel Corp., Brian G. Utley, Arthur Anderson, Greenberg Traurig, Todd Outten, Doug Chey, Scott Sherr, Comcast, TCI, Time Warner Cable, Mobile Streams PLC, Sprint Nextel Corporation, Ideiasnet, Crown Media Holdings Inc., David J.A. Flowers, Albert E. Rosenthaler, Christopher W. Shean, Charles Y. Tanabe, Xbiz, Bittorent, Manwin, Liberty Media, Media Products Inc., Encore, STARZ, Encore Media Group, John C. Malone, Gregory B. Maffei, TCI Ventures Group LLC, ATT, Liberty Interactive, Lee Masters, Bruce Ravenel, Liberty Digital Inc., TCI Satellite Entertainment Inc, Discovery Channel, News Corporation, QVC, MediaOne Group, CBS, The Weinstein Company, Liberty Capital, SaltyDroid Jason Jones, Todd Kinnican, Jordan Rushie Philly Law Blog, Bob Garfield NPR, Kashmir Hill Forbes, David Carr New York Times,

Kenneth P. White Popehate.com, SiouxsieLaw.com, SequenceInc.com Tracy Coenen, Kevin D. Padrick, David W. Brown, Mike Morgan Tonkon Torp Law Firm, David S. Aman, Steven Wilker, Jessica Griffin at Godaddy, Mike Stack (Redgoat aka Goatsred), Weinergateand, Michael Fattorosi, Judge Michael Simon, Judge Marco Hernandez, Doug Chey, Movielink, Sony Pictures, Metro-Goldwyn-Mayer, Paramount Pictures, Sony Pictures Entertainment, Universal, Warner Bros, Best Buy, MovieFly LLC, Global Digital Media Group, Blockbuster, Sony John Calkins, David Colter, Chuck Dages, Todd Outten, Scott Sherr, Silcon Graphics, Douglas Chey, Michael Arrieta, WIPO Director Francis Gurry, Raymond Joao, Douglas Boehm, R3D, Steven Becker, Raymond Hersch, John Malone, Digital Playground Inc., Manwin GERMANY GMBH, Fabian Thylmann, Manwin Licensing International, Manwin USA Inc., Brazzers, Xtube, PornHub, Spankwire and John and Jane Doe's to be added to this Federal Investigation at a later date.

There is Clear and Convincing reason to Investigate under RICO

I, Crystal L. Cox, Pro Se Defendant, Pro Se Counter Plaintiff make this statement upon knowledge and belief and to the best of my ability, in my Pro Se Capacity.

Counter Defendant Marc Randazza and his Clients, Co-Conspirators, Counter Defendants have used “media”, radio, attorney bloggers, news sites, and more to carry out the “sentence” they want, in these cases to get a settlement that is of their best interest.

Counter Defendant Marc Randazza and, Co-Conspirators, Counter Defendants severely harass and intimidate whistle blowers who expose the crimes within the Porn Industry.

Counter Defendant Marc Randazza and, Co-Conspirators, Counter Defendants are part of a larger problem in lack of accountability and transparency in the U.S. Justices System. Judges have absolute power, attorneys do not obey the law, and Plaintiffs AND Defendants of legal cases are at the mercy of these judges and attorneys, they give up their money, their quality of life and all they knew to be their life before these judges and attorneys made them victims of a fraudulent, corrupt, non-transparent, unconstitutional court system.

Counter Defendant Marc Randazza and, Co-Conspirators, Counter Defendants use the courts to bully defendants (Targes aKa Victims), into coming to a settlement sooner, paying large legal fees or “behaving”, taking action in whatever way they want for their best interest and highest dollar.

Counter Defendant Marc Randazza and, Co-Conspirators, Counter Defendants file lawsuits constantly targeting those who exercise their First Amendment Rights online, yet Counter Defendant Marc Randazza publicizes himself as a First Amendment Rights Attorney / Expert. But instead Counter Defendant Marc Randazza uses his knowledge of the courts regarding First Amendment Rights, Copyright Issues, Trademarks, to shake down clients, racketeer, co-conspire and create money where no money existed, by suing innocent victims.

Counter Defendant Marc Randazza and, Co-Conspirators, Counter Defendants use the courts to make their target (Victims, Defendants) look like criminals, look like they have done something wrong, unethical, vile, and unconstitutional. They do this by manipulating online and offline media, attorney blogs, NPR and more to create an illusion to use as court evidence, “Legal Commentary” when really it is a picture THEY intentionally paint of their Victims (Defendants) so they can get the outcome they want in their court case, and they do this over and over.

Counter Defendant Marc Randazza and, Co-Conspirators, Counter Defendants constantly violate the 8th amendment rights of their target, as they issue up cruel and unusual punishment, and even drive some of them to suicide. Many others, I am told, they make to look like suicide.

Counter Defendant Marc Randazza accused me of defaming, harming him somehow and he convinced a judge to take all my domain names, blogs and sites AND then Counter Defendant Marc Randazza redirected all my domain names, and the domain names of Defendant Eliot Bernstein and redirected them to ONE Blog post on Counter Defendant Marc Randazza's blog where he does far worse then he had accused me of, and used my own web presence and domain names to do so. This was in conspiracy with Judge Gloria M. Navarro and an unconstitutional, illegal TRO Injunction. And in conspiracy with Godaddy, Bob Parsons, WIPO, Francis GURRY head of WIPO, and Peter L. Michaelson WIPO Panelist.

I, Crystal L. Cox, Pro Se Defendant, Pro Se Counter Plaintiff make this Civil RICO statement upon knowledge and belief and to the best of my ability, in my Pro Se Capacity.

Racketeer Influenced and Corrupt Organizations Act ("RICO"), 18 U.S.C. § 1961 through 1968 et seq., the party asserting such a claim shall file a RICO Statement within thirty (30) days of the filing of the pleading containing such claim and shall serve a copy of the RICO Statement on the defendants or their counsel.

I, Crystal L. Cox, Pro Se Defendant, Pro Se Counter Plaintiff request this court Serve, Provide Service to the Following Defendant List. Counter Plaintiff Crystal Cox cannot afford, is unable to provide service of documents to Counter Defendants and this case is an important Public Issue and Public Concern. (pauper in papius) this RICO Statement on ALL named defendants and their counsel.

I, Crystal L. Cox, Pro Se Defendant, Pro Se Counter Plaintiff believe that Counter Defendant Marc Randazza and his Clients, Co-Conspirators, Counter Defendants have violated Federal Rules of Civil Procedure 18 U.S.C. § 1961 through 1968.

I, Crystal L. Cox, Pro Se Defendant, Pro Se Counter Plaintiff make this statement upon knowledge and belief and to the best of my ability, in my Pro Se Capacity.

I, Crystal L. Cox, Pro Se Defendant, Pro Se Counter Plaintiff believe that Counter Defendant Marc Randazza and his Clients, Co-Conspirators, Counter Defendants have violated Federal Rules of Civil Procedure 18 U.S.C. §§ 1962(a),(b),(c), and/or (d)

The Following RICO Statement shall set forth the facts, upon the knowledge and believe of Crystal L. Cox which Counter Plaintiff Crystal Cox is relying to initiate the complaint, under the circumstances as set forth in Rule 11(b) of the Federal Rules of Civil Procedure.

I, Crystal L. Cox, Pro Se Defendant, Pro Se Counter Plaintiff believe that Counter Defendant Marc Randazza and his Clients, Co-Conspirators, Counter Defendants are engaged in scams to steal intellectual property through fraudulent legal action and misinformation to the courts and to WIPO.

I, Crystal L. Cox, Pro Se Defendant, Pro Se Counter Plaintiff believe that Counter Defendant Marc Randazza and his Clients, Co-Conspirators, Counter Defendants have conspired to intimidate, pressure, harass threaten sources, insiders, whistleblowers in order to silence me, Investigative Blogger Crystal L. Cox, Pro Se Defendant, Pro Se Counter Plaintiff from reporting on their involvement in the stealing and infringement of the iViewit Video Coding Technology, estimated to be worth 13 Trillion Dollars and a liability of at least a Billion to each co-conspirator involved in the unauthorized use of the iViewit Technology.

I, Crystal L. Cox, Pro Se Defendant, Pro Se Counter Plaintiff believe that Counter Defendant Marc Randazza of Randazza Legal Group and his, Co-Conspirator, Counter Defendant David S. Aman of Tonkon Torp Law Firm have named Eliot Bernstein, founder of iViewit Technology and one of the iViewit Video Coding Technology inventors, in 2 separate legal actions as a named Defendant with me, Crystal L. Cox, Pro Se Defendant, Pro Se Counter Plaintiff, who was and is reporting on the iViewit Technology theft, in order to discredit the iViewit Story, intimidate a reporter / investigative blogger reporting on the story and to protect their clients who are Co-Conspirators, Counter Defendants liable for Billions of Dollars each, for iViewit Technology Infringement.

Upon Knowledge and Belief of Counter Defendant Crystal Cox, Marc J. Randazza has been in engaged with the following Counter Defendants in conspiracy for several years to paint in false light, defame, harass, intimidate and pressure court case defendants where by co-conspirators are the attorneys that get paid legal fees, or get settlements negotiated based on the pressure to the defendants by a ring of attorney bloggers and Media Bloggers, Traditional News, NPR, an other mass media outlets.

Upon Knowledge and Belief of Counter Defendant Crystal Cox, These bloggers, media providers, attorney bloggers are Kenneth P. White, White and Newhouse Law Firm, Kashmir Hill of Forbes, Forbes Inc., David S. Aman, David Carr, New York Times, Bob Garfield, NPR Radio, Jordan Rushie, Philly Law Blog, Leo M. Mulvihill, Jr., Mulvihill & Rushie, LLC, SaltyDroid, Jason Jones Esq., Janine Robben, Oregon State Bar Bulletin, Tracy L. Coenen, Mark Bennett, XBIZ, blog.bennettandbennett.com, Bennett and Bennett, Scott H. Greenfield, Carlos Miller, WIPO, Peter L. Michaelson, Eric Turkewitz, Turkewitz Law Firm, Roxanne Grinage, HireLyrics, NewYorkPersonalInjuryAttorneyBlog.com, blog.simplejustice.us, HireLyrics, Sean Boushie, University of Montana, Martin Cain, Tim Vawter, Ari Bass - Michael Whiteacre, J. Malcom DeVoy, Ronald D. Green, Sean Tompkins, Free Speech Coalition, John and Jane Does'.

One victims is myself, Counter Defendant Crystal L. Cox. Other victims are defendants of the legal cases of the above noted attorneys as they "blog" write on, report on each others cases, in order to affect the ruling of the court case and thereby pressure settlements. The victims then become clients on both sides who have to pay attorney fees of the Plaintiff and Defendant in those cases. These blogs, radio shows, big media paint a picture and use legal words, descriptions and these blog posts, reports are then put in as evidence and judges call them "legal commentary" and take them as factual evidence when indeed they are other co-conspirators created a picture of the case and the defendants, issues, plaintiff, in order to force a settlement or get prolonged fees for each other.

Upon Knowledge and Belief Marc J. Randazza has in engaged with the following Counter Defendants in conspiracy to suppress information and shut down massive blogs, blog posts and connected links and sublinks in which expose / report the iViewit Technology theft and the iViewit / Eliot Bernstein Legal Filing (Docket No: 07-Civ-11196 (SAS) Related Docket No: 07-Civ-9599 (SAS), RICO Complaint, and Surrounding Court Cases and Ongoing Investigations, and connected to the The United States District Court for the Southern District of New York, Christine Anderson Whitewashing Case. And in Connection to Judge Shira A. Scheindlin and iViewit Related Cases.

Upon Knowledge and Belief Marc J. Randazza has in engaged with the following Counter Defendants in the above alleged activities, actions:

Kenneth Rubenstein Proskauer Rose Attorney, Matthew M. Triggs, Gregg Mashberg, Peter L. Michaelson WIPO, Francis Gurry WIPO, Intel Corp., Steven Rodgers Intel VP., Steve Dowling APPLE, Bruce Sewell APPLE, Edward Kwakwa WIPO, Bret Sewell Synaptics, David Wang Synaptics, Mark Vena Synaptics, Synaptics, Doug Chey, Liberty Media Holdings, John C. Malone, Corbin Fisher, Manwin, Martin Cain, Dylan Energy, Judge Gloria M. Navarro, Daniel Staton, District of Nevada Court, GoDaddy, Jessica Griffith, Bob Parsons, Obsidian Finance Group, Tonkon Torp Law Firm, Steven Wilker, David S. Aman, Kevin D. Padrick, Erik Wilbers WIPO, Marshall Ross, Multnomah County Sheriff, and

Liberty Media Holdings Connected Companies: Liberty Capital, AOL Inc. (1% through Liberty Capital and 2% through Liberty Interactive), Barnes and Noble Inc. (17%), CenturyLink Inc. (1%) Crown Media Holdings Inc. (3%), Current Communications Group LLC. (8% through Liberty Partners and Liberty Associated Partners), Jingle Networks Inc. (9% through Liberty Partners and Liberty Associated Partners), Kroenke Arena Company LLC. (7%), Live Nation Entertainment Inc. (21%), Mobile Streams Inc. (16%), Motorola Mobility Inc. (2%) Motorola Solutions Inc. (2%), Priceline.com Inc. (1%), Sirius XM Radio Inc. (40%) Sprint Nextel Corporation (2%), Time Warner Cable Inc. (1% through Liberty Capital and 2% through Liberty Interactive), Time Warner Inc. (1% through Liberty Capital and 2% through Liberty Interactive), Viacom Inc. (1%)

I, Pro Se Defendant / Counter Plaintiff Crystal L. Cox , AGAIN,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.

Exhibits in this case Clearly 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 that 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](#)

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§ 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."

Plaintiff / Counter Defendant Marc Randazza of Counter Defendant Randazza Legal Group, filed for a Protective Order AGAINST Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox, an investigative blogger, ex Client of Plaintiff / Counter Defendant Marc Randazza and Counter Defendant Randazza Legal Group, due to her buying a domain name. This Protective Order filed by Marc J. Randazza, Applicant AGAINST Crystal L. Cox, Adverse Party, as Document Says, was filed on April 13th of 2012 in the court of **Judge Melissa Saragosa, Las Vegas Justice Court Case # 12PO0499 (See Attached Exhibit LV CS)**

Plaintiff / Counter Defendant Marc Randazza and Counter Defendant Randazza Legal Group, Ronald D. Green claim that Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox has no right to a protective order though she has been attacked, threatened, harassed, intimidated, defamed and gang stalked by Plaintiff / Counter Defendant Marc Randazza and Counter Defendant Randazza Legal Group, Ronald D. Green and their Co-Conspirators and other Counter Defendants for nearly a year.

Plaintiff / Counter Defendant Marc Randazza and Counter Defendant Randazza Legal Group, Ronald D. Green and their Co-Conspirators and other Counter Defendants have threatened physical harm, have lied to officials and ruined the business of Crystal Cox, have gang stalked Crystal Cox, have used attorney blogs to paint Crystal Cox out as a Criminal when she was NEVER on Trial for a Crime, have threatened to come to the town she lives in and "Bye Bye", have threatened her sources, and have put her under EXTREME attack and duress.

Yet Plaintiff / Counter Defendant Marc Randazza and Counter Defendant Randazza Legal Group, Ronald D. Green OBJECT to this court protecting Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox. Even though Plaintiff / Counter Defendant Marc Randazza of Counter Defendant Randazza Legal Group, filed for a Protective Order AGAINST Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox, an investigative blogger, ex Client of Plaintiff / Counter Defendant Marc Randazza and Counter Defendant Randazza Legal Group, due to the simple act of buying a \$10 Domain Name that Plaintiff did not approve of.

I, Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox OBJECT to Plaintiff / Counter Defendant Marc Randazza and Counter Defendant Randazza Legal Group, Ronald D. Green's OPPOSITION TO DEFENDANT CRYSTAL COX'S MOTION REQUESTING PROTECTIVE ORDER.

Plaintiff / Counter Defendant Marc Randazza and Counter Defendant Randazza Legal Group, Ronald D. Green have no lawful, constitutional, legal, moral right to deny Defendants and Sources protection from the cruel, threatening, endangering, criminal, vile behavior of the Plaintiff / Counter Defendant Marc Randazza and Counter Defendant Randazza Legal Group, Ronald D. Green and their Co-Conspirators and other Counter Defendants.

Plaintiff / Counter Defendant Marc Randazza and Counter Defendant Randazza Legal Group, Ronald D. Green and other Co-Conspirators and Counter Defendants have criminally endangered Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox,

It is the duty of this court to protect defendants being harassed, stalked, pressured and intimidated by Plaintiff / Counter Defendant Marc Randazza and Counter Defendant Randazza Legal Group, Ronald D. Green and other Co-Conspirators and Counter Defendants.

Plaintiff / Counter Defendant Marc Randazza and Counter Defendant Randazza Legal Group, Ronald D. Green and other Co-Conspirators and Counter Defendants have set out to harm, intimidate, gang stalk, discredit, paint in false light and put ccc under massive personal stress, duress, every single day.

Plaintiff / Counter Defendant Marc Randazza and Counter Defendant Randazza Legal Group, Ronald D. Green and other Co-Conspirators and Counter Defendants post that they are coming to her down, call her sick and vile names and say Bye, Bye. They taunt, threaten and harass constantly, it is the duty of this court to protect Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein, as well as sources Monica Foster aKa Alexandria Melody, Diana Grandmason aKa Desi Foxx and Shelley Lubben, to the best of this court's ability and power.

Plaintiff / Counter Defendant Marc Randazza and Counter Defendant Randazza Legal Group, Ronald D. Green attempts to remove evidence that shows the violence and illegal activities of Plaintiff / Counter Defendant Marc Randazza and Counter Defendant Randazza Legal Group, Ronald D. Green and other Co-Conspirators and Counter Defendants.

I, Counter Plaintiff / Defendant Crystal Cox, again ask this court for a Protective Order for myself and my sources, as noted in my Motion for a Protective Order. Counter Defendant Ronald D. Green, in Conspiracy with Counter Defendant / Plaintiff Marc Randazza objects to a protective order due to Randazza Legal Group being connected to Ari Bass and Sean Tompkins, the main aggressors of violence and threats.

Tonight, Counter Defendant Ari Bass aKa Michael Whiteacre attacked a woman in Las Vegas. Per my court documents I have shown him to be dangerous and asked this court to give me and my sources a Protective Order. This is a Very Serious Matter, this court has thus far ignored this serious issue and refused to notify authorities.

Exhibit A is Tonights Incident, I do not have the Police Reports yet. I, Counter Plaintiff / Defendant Crystal Cox, request this court obtain the Police Report regarding Ari Bass aKa Michael Whiteacre and attacking an industry insider in Las Vegas, and enter this into Evidence regarding DISTRICT OF NEVADA **Case 2:12-cv-02040-GMN-PAL**

In Exhibit A, you see, "Now @TRPWL is calling me", this is Sean Tompkins, as I, Counter Plaintiff / Defendant Crystal Cox, have previously warned this court of the danger in which Sean Tompkins and Ari Bass aKa Michael Whiteacre are to Porn Industry Insiders. Sean Tompkins and Ari Bass aKa Michael Whiteacre threatened me and my sources, as the record shows. See Exhibit B for threats, harassment, photos of residence, and more threats from Counter Plaintiffs to Counter Plaintiff / Defendant Crystal Cox and her sources, industry insiders.

@TRPWL is confirmed to be Sean Tompkins, as Exhibit C Shows.

Mercedes Ashley and Sean Tompkins are connected and acting in violent conspiracy against Porn Industry insiders who expose their prostitution ring.

Counter Defendant Sean Tompkins is connected to Counter Defendant J. Malcom DeVoy of Counter Defendant Randazza Legal Group, and to Plaintiff Marc Randazza.

Plaintiff Marc J. Randazza posted on a Forum, the make and Model of Industry Insider Monica Fosters Car, and "wished" her death.

It is this court duty to protect defendants and those involved in federal court proceedings.

Counter Plaintiffs and Co-Conspirators are dangerous, they threaten and beat these industry insiders who speak out against their corruption, and then they gang up on blogs and forums to make their prey, their victims look like the criminal. This is a very serious matter.

I, Counter Plaintiff / Defendant Crystal Cox, again ask this court for a Protective Order for myself and my sources.

Plaintiff / Counter Defendant Marc Randazza is currently in a legal action with GoDaddy.

Yet this same attorney SUES me, takes massive domain names, and even a .me that I never used and ONLY Godaddy made revenue from. Now Plaintiff / Counter Defendant Marc Randazza is suing GoDaddy in another case, proving that he knows I had no liability in his case against me, yet he deliberately harassed me.

Plaintiff / Counter Defendant Marc Randazza SUES to make a Living, and this is a constant Fraud on the Court and a HUGE Public Concern.

Godaddy violated my rights and transfered Domain Names to Plaintiff / Counter Defendant Marc Randazza, without locking servers, this is against the LAW, the UDRP.

Plaintiff / Counter Defendant Marc Randazza acted in conspiracy with Counter Defendant GoDaddy, to steal my domain names and change the Servers. Godaddy profits from the names they sell to the public and they should not sell trademarked names, yet the end user pays the price.

"The new lawsuit takes a very broad aim, though, by not only suing Texxxan.com but going after the site's host, GoDaddy, apparently for not much more reason than the fact that at some point Texxxan cut a check to GoDaddy. John Morgan, the lawyer who filed the suit on Toups' behalf, didn't immediately respond to a request for comment from Ars, but explained his strategy to the Observer this way:

"GoDaddy is profiting off of it. The reality of it is at some level this issue of revenge porn has to become a public discussion and a legislative discussion and it raises issues of corporate responsibility. Why would an organisation like GoDaddy want to give its name to this type of website?" GoDaddy declined to comment."

Plaintiff / Counter Defendant Marc Randazza is now suing GoDaddy, yet in my case suing me for what he now claims Godaddy is doing. Plaintiff / Counter Defendant Marc Randazza commits fraud on the courts in a repeat pattern in multiply stays and the Laws do not apply to him, this is something that the Department of Justice, FBI, INTERPOL, and more need to be made aware of Plaintiff / Counter Defendant Marc Randazza's pattern and history and how this shakedown of clients, and constant suing innocent parties is a violation of the law, and of the constitution.

Plaintiff / Counter Defendant Marc Randazza sues people constantly to make a paycheck for himself, to get attorney fees.

Plaintiff / Counter Defendant Marc Randazza brought a SLAPP suit against me, yet makes the public think he against SLAPP suits.

This court seems to enable Plaintiff / Counter Defendant Marc Randazza to sue Defendants often, simply to make his legal fees and for that of Randazza Legal Group. Plaintiff / Counter Defendant Marc Randazza is committing constant fraud on the courts in a pattern and history and it is this courts' legal obligation to notify authorities.

Plaintiff / Counter Defendant Marc Randazza calls himself Marco Randazza as his online Persona, yet this court and WIPO just let him claim a trademark on his name, meanwhile he uses my name and TRASHES me, Counter Plaintiff Crystal Cox Constantly, and with sites such as CrystalCoxSucks.com, Crystal-Cox.com, CrystalCoxBlows.com, and they have lots of videos and massive blog posts defaming me, yet this court enables Marc Randazza to violate the law and seize names to control the search engines and suppress the iViewit Story. This is not legal and it is Racketeering, Repeat Pattern and History, RICO. This court knows and has a lawful duty to notify authorities. If not, then criminal charges, obstruction of justice will be charged against all ruling on this matter.

The Laws and the Constitution should not just APPLY to who Plaintiff / Counter Defendant Marc Randazza says it does.

Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators Counter Defendants have a Pattern and History of suing websites, blogs domain name owners, inventors, that compete with them in the search engines. This is competing search terms, such as me have great search engine placement, so Plaintiff / Counter Defendant Marc Randazza sued, and Judge Gloria Navarro, in what I believe to be conspiracy to help Plaintiff / Counter Defendant Marc Randazza and Co-Conspirator simply wiped out massive blog links, content, search engine placement and essential competition. The revenge porn lawsuits against Godaddy and the site owners are set to do the same thing, simply remove the competition of Corbin Fisher, Xbiz, Liberty Media Holdings and other companies in which Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators Jordan Rushie, Ronald Green and more represent.

Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators have big media connections, they have massive court connections and seem to own judges, and they have a gang of attorney bloggers that create a false story in the search engines, that they use as evidence, and Judges call it “Legal Commentary” though it not factual documentation and use this evidence to take money, domain names, life’s work and content from their target.

Plaintiff / Counter Defendant Marc Randazza sued me and Judge Gloria Navarro, without First Amendment Adjudication, and in what I believe upon knowledge and information, in conspiracy with Plaintiff / Counter Defendant Marc Randazza SIMPLY wiped out my domain name content, my blogs, my alternative media, my free press, my investigative blogs, and all without my due process.

This court is obligated to let authorities know what Plaintiff / Counter Defendant Marc Randazza is doing to his targets.

Plaintiff / Counter Defendant Marc Randazza is an attorney, he sees an asset he wants or competition he wants to wipe out and therefore he sues the target into submission.

Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators need to be investigated for their role in the iViewit Technology theft and in Plaintiff / Counter Defendant Marc Randazza suing an Investigative Blogger reporting on the story, and the inventor himself. This is the worlds biggest technology crime, with over 1200 documents of proof. This court has been made aware of this crime and of the co-conspirators involved has a duty to notify authorities

Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators is connected to a site called PornWikiLeaks.com, which is dangerous to Porn Industry insiders as it names their real names and their families. Co-Conspirators Randazza Legal Group, Marc Randazza, Ari Bass aKa Michael Whiteacre, Sean Tompkins, Diana Duke, Brown White and Newhouse, Kenneth P. White and the Free Speech Coalition are connected to this site, and it is this court's duty to report all known or suspected criminal activity.

PornWikiLeaks.com actually commits hate crimes, put people in danger, and is a massively copyright violating site, using the trademarked name of massive porn stars. Yet **Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators are connected to this site, and yet get this court to simply delete my domain names by claiming they harm them somehow, when clearly they do not.**

PornWikiLeaks.com exposes children, yet **Plaintiff / Counter Defendant Marc Randazza and Co-Conspirator Kashmir Hill painted a picture that I was an Evil monster because I had a domain name of a child, in which i never used, nor named, the same child in which they continue to exploit for their gain through this lawsuit. And this court, KNOWS, I did not list the child in my documents nor countersuit, yet this court has posted the child as a coutnerdefendant, which is FALSE. I have not filed a counterclaim naming a child.**

PornWikiLeaks.com is a Wordpress Blog, yet when Marc Randazza simply asked wordpress to remove my blogs exposing him they did. I, Defendant / Counter Plaintiff Crystal Cox fully believe that Wordpress is in conspiracy with Marc Randazza and others. TO power a site like PornWikiLeaks.com that actually causes massive harm, and yet delete my blogs that were simply reporting my experience and griping, this is evidence that wordpress is protecting and acting on behalf of Plaintiff / Counter Defendant Marc Randazza.

Domains such as MarcRandazzasALyingAsshole.com, MarcRandazzaSucks.com, MarcRandazzaParody.com, ExposeMarcRandazza.com, RandazzaLegalGroupSucks.com and lots more domain names and blogs have been SEIZED by Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators, and now they redirect to a blog post defaming Defendant / Counter Plaintiff Crystal Cox, who Plaintiff / Counter Defendant Marc Randazza once negotiated with Opposing Counsel as her, my attorney, as First Amendment Bar Attorneys can attest to.

Plaintiff / Counter Defendant Marc Randazza is above the law, and is a danger to the public, in his abuse of power, it is this courts' duty to notify authorities.

Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators are dangerous and ruin lives, and they are breaking the law.

Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators are connected to Prostitution Rings, and Illegal Escort Services, it is this court's lawful duty to notify authorities and special prosecutors to investigate these matters.

**Failing to Uphold the Law and Report Possible Criminal Activity
is a Violation of Oath of Office.**

Failing to disclose conflicts of interest is a Violation of Oath of Office and a Crime.

This court has a moral, ethical and legal duty to report all crimes.

This Court must follow the Code of Judicial Conduct.

It is this court's duty to report Attorneys abusing their clients, committing criminal acts of violence, engaging in dishonest behavior, committing hate crimes, and intimidating news media reporting on them and their clients.

Canons 1 and 2 impose on judges the duty to uphold the integrity of the judiciary and promote public confidence in it. A courtroom is not a 'duty free zone' in which serious crimes may be admitted with impunity. A blanket judicial attitude of 'hear no evil, see no evil, report no evil' does not inspire public confidence.

Defendant Crystal Cox Declaration of Connected Cases:

Case 2:12-cv-02040-GMN-PA District of Nevada is connected to Case CV-11-57-HZ U.S. District Court District of Oregon, Case 2:12-mc-00017-JPH Eastern District of Washington Circuit Court of Oregon Multnomah County Case No. 121215329 and Ninth Circuit Appeal Case: 12-35319. All case dockets, documents, and filings.

I, Defendant / Counter Plaintiff Crystal Cox, declare that there is reason and belief that Rakofsky v. The Internet, Supreme Court of the State of New York; County of New York, Case Number 105573-2011, is a connected case and connected matters, with similar parties engaging in RICO, Pattern and History against victims.

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 February 10th 2013.

Respectfully Submitted
Pro Se Defendant
Crystal L. Cox
Case 2:12-cv-02040-GMN-PAL