

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

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

Plaintiff, Marc J. Randazza

**Amended Complaint Answer Per Rule
15(a) of the Federal Rules of Civil Procedures**

vs.

Crystal L. Cox and Eliot Bernstein, Defendants

Pro Se Defendant Crystal Cox ANSWER to Complaint, Randazza V. Cox

Rule 15(a) of the Federal Rules of Civil Procedures states that **“a party may amend its pleading once as a matter of course...”** Fed. R. Civ.P.15(a)(1). As stated by Judge Gloria Navarro in **Document 89, Page 5 of 5 Line 5, of this Civil Proceeding.**

Judge Gloria Navarro has stricken from the Record, the Original Complaint Answer filed by Pro Se Defendant Crystal Cox on January 3rd, 2013, and Stricken from Record, Pro Se Defendant Crystal Cox's Counter Complaint filed on January 3rd, 2013, therefore **the only pleading that now is of record, is Docket Entry 90, Dated 2/23/2013**, therefore, under Fed. R. Civ.P.15(a)(1), Pro Se Defendant Crystal Cox has one “Opportunity” to file an amended **“pleading ONCE as a matter of course”**. **This Filing is Defendant Crystal Cox's “amended pleading”, “once”**.

I, Pro Se Defendant Crystal Cox, filed my Complaint Answer, Docket 90, Dated 2/23/2013 **without addressing the issue of Conspiracy**, though I was accused of a Civil Conspiracy by the Plaintiff in Cause of Action 6 of the Original Complaint. I, Pro Se Defendant Crystal Cox, was not allowed a counter complaint in this case, as was my constitutional and lawful right.

I, Pro Se Defendant Crystal Cox, filed my Complaint Answer, Docket 90, Dated 2/23/2013 **without thoroughly addressing the issue of Conspiracy**, under duress, out of fear of a threatened default judgement by Judge Gloria Navarro which would be over 3 Million Dollars, and further ruin my life and damage my career.

Since this filing of Docket 90, Dated 2/23/2013, I Pro Se Litigant have done further research and believe that **I have a legal, constitutional right to address the Conspiracy Allegation**, Cause of Action Number 6, even though in Docket 89, a Court Order Signed by Judge Gloria Navarro, Page 4, Line 15 - 17, claims that **the issue of conspiracy is not related to the complaint allegations**, and therefore is not an “in good faith” intent to deny allegations addressed in the original complaint, as I, Defendant Crystal Cox, seemed to simply be answering to some **“accusations of conspiracies”**, as Line 15, Page 4 of Document 89 Clearly Says.

I, Defendant Crystal Cox was ACCUSED of **“Conspiracy”** in the Original Complaint by Plaintiff Randazza, and clearly I have a right to address this issue and not have my defense simply be stricken from the record, and my hands tied as to answering the complaint in regard to ONLY one of the allegations, Civil Conspiracy. I was court ordered to only answer the allegations of **“Cybersquatting”** and **“Related Allegations”**, Line 16 and 17, of Document 89, Page 4 of 5. This completely left out Cause of Action number 6, which was **Civil Conspiracy**, which is a violation of my rights of due process and my constitutional rights..

I, Pro Se Litigant Crystal L. Cox have a legal and constitutional right to answer this complaint thoroughly to the best of my ability and to NOT be Censored in what parts I answer to and what parts I ignore in my answer, per Judicial Order.

I, Pro Se Litigant Crystal L. Cox have a legal and constitutional right to a counterclaim, as Plaintiff used this complaint to defame and harass me, to bully and intimidate me, to cost me time and money, to put undo stress on me, to ruin my reputation, to harm my online business, to wipe out my personal creations and online work (intellectual property), to accuse me of criminal activity and all of this given the fact that Plaintiff was an Attorney negotiating on behalf of Defendant Crystal Cox in Obsidian Finance Group vs. Crystal Cox, and Plaintiff interfered with Defendant Crystal Cox's Ninth Circuit Appeal. I have a right to counter sue, and a right to relief, as allowed by law.

I, Pro Se Litigant Crystal L. Cox am fighting for my life, my livelihood, and my quality of life, as well as fighting for those I report on and the sources, whistleblowers, who are also being maliciously harmed by the Plaintiff and his alleged co-conspirators. I, Pro Se Litigant Crystal L. Cox have every right to equal process of law.

This court, Judge Gloria Navarro, is liable for the damage caused to my online media, my reputation, and the life endangerment and harassment hence. I have done nothing wrong, immoral, or illegal. I am an Anti-Corruption Media service trying to expose corruption and make the world a better place for all. I deserve equal treatment under the law, even if I cannot afford an attorney.

This court, District of Nevada, should Enjoin the Attorney General into these very serious matters. This court, District of Nevada, has knowledge of intimidation, conspiracy, harassment, racketeering, and should notify all property authorities to a special investigation into these matters.

As for the other Allegations in the original complaint, I had Denied them All, as Plaintiff has no Trademark and I, Pro Se Defendant Crystal Cox had no violation. Judge Gloria Navarro did not view my Denial as clear enough nor related to that allegation, therefore my Complaint Answer was Stricken from the Record.

In Order, Docket Entry 89, Judge Gloria Navarro also says that Defendant Cox must have short and plain terms of defense, yet Cause of Action 6, which is Civil Conspiracy, by the Plaintiff is a HUGE allegation and **there is no simply, short, plain defense** that clearly explains where the real conspiracy lies.

Judge Gloria Navarro tied my hands and sequestered my constitutional rights in order to protect the Plaintiff and herself from being exposed as action in Conspiracy against a Media Defendant reporting on the biggest Technology theft in the world, iViewit Technology, Founder and one of the iViewit Inventors, Eliot Bernstein. Of which Plaintiff's clients and Plaintiff's Attorney Ronald D. Green are involved in, have liability in regard to.

Judge Gloria Navarro struck my counter complaint from the record and my complaint answer, claiming they were redundant, immaterial, impertinent, scandalous matter, and an insufficient defense as per line 20, page 2 of Order, Document 89.

Yet in exact opposite, rulings, and Pro Se discrimination, upon my knowledge and belief, Judge Gloria Navarro allowed Plaintiff Randazza to simply state actions that Defendant did; scandalous, illegal actions, and with no proof that they even happened, such as Defendant Crystal Cox extorted Plaintiff, which I did not and Plaintiff gave no proof to this immaterial, impertinent, scandalous matter. For another Example, Plaintiff Randazza Accused Defendant Cox of having a blog about a 3 year old which never existed, and yet this immaterial, impertinent, scandalous matter, unrelated to the allegations of violations was allowed into the courts.

Plaintiff accusing Defendant of having a Blog about his 3 year old daughter, a blog never proven to exist, was certainly scandalous and immaterial, Plaintiff never proved it did exist and yet was allowed to state whatever he alleged as FACT, this is Pro Se Discrimination.

Plaintiff Randazza accused Defendant Crystal Cox of extortion, which is an "Impertinent Matter", as it is unrelated to that allegation, cause of actions in this case. And if Plaintiff feels that Defendant Crystal Cox is guilty of the Crime of Extortion, then Certainly Plaintiff should file a Criminal Complaint instead of using legal filings such as a WIPO Complaint and this Civil Complaint in the court of Judge Gloria Navarro, to simply defame, harass and discredit

Defendant Crystal Cox and Defendant Eliot Bernstein. And Judge Gloria Navarro should not allow Plaintiff Randazza to say such immaterial, impertinent, scandalous matter, yet she did and in Pro Se Discrimination, wiped out my defense, ignored my pleas for protective orders, ignored my outcries for federal investigations and completely dismissed my defense in this case.

Judge Gloria Navarro allowed motions to be entered into this court in which defamed Defendant Crystal Cox, Attacked and Harassed Defendant, and was certainly redundant, immaterial, impertinent, scandalous matter. I, Pro Se Defendant Crystal Cox OBJECT to this clear, obvious discrimination against a Pro Se Litigant. And wish this court to acknowledge that the actions of Judge Gloria Navarro were not lawful, constitutional and have denied Defendant Crystal Cox the right to Due Process.

Judge Gloria Navarro called the information Plaintiff Randazza submitted to the courts "Legal Commentary" and seemed to take Plaintiff's word as fact, with total disregard for proof of those allegations, and the information provided to this court by Pro Se Defendant Crystal Cox.

This is not simply a matter of removing Judge Gloria Navarro from this civil case. As Judge Gloria Navarro has already issued a Preliminary Injunction that has caused me, Defendant Crystal Cox, personally, massive amounts of irreparable damage. The unconstitutional Preliminary Injunction GRANTED to Plaintiff Randazza by Judge Gloria Navarro allowed for the Plaintiff Randazza to change the servers of my domain names, delete blogs and internet content, and redirect thousands of links to one page on Plaintiff's blog, defaming me, harassing me, Defendant Crystal Cox. This damage cannot be undone, cannot be recreated, and the search engine placement that the Plaintiff stole via this Preliminary Injunction, cannot be fixed, this cannot be undone.

On top of that, Plaintiff Randazza was awarded that same Preliminary Injunction on domains owned by iViewit Founder Eliot Bernstein, that used to be owned by me, Defendant Crystal Cox. These domain names, as clearly is a matter of record on the Obsidian Finance Group V. Crystal Cox Docket, were taken by Eliot Bernstein in receivership, in lieu of a personal debt that I, Pro Se Defendant had with Eliot Bernstein, the Bernstein Family. Now that Judge Gloria Navarro has issued this Preliminary Injunction, I once again owe this Debt to Eliot Bernstein and the Bernstein Family.

This Preliminary Injunction was granted without First Amendment adjudication and without due process of law given to me, Defendant Crystal Cox, or Defendant Eliot Bernstein.

Plaintiff Marc Randazza already won this case, the day he filed the Complaint, as when he filed the complaint, he also filed a Motion for a Preliminary Injunction that same day, in which he knew he would get, just as he did from this same judge in the ViaView Vs. Blue Media Case in this same court, Judge Gloria Navarro.

Plaintiff Marc Randazza wanted information removed from the search engines that, in a fair marketplace, competed with him for certain search terms, Plaintiff Marc Randazza wanted blogs exposing the iViewit Technology theft removed and discredited, Plaintiff Marc Randazza wanted blogs shut down that spoke critical of him and gave him a bad review, Plaintiff Marc Randazza wanted to seek revenge on a woman whom he had acted as her attorney, and to suit all these needs at once, and with complete disregard for the law and due process, and with no First Amendment Adjudication as he is well aware as a First Amendment Attorney, was the right of Defendant Crystal Cox and Defendant Eliot Bernstein.

Plaintiff Marc Randazza was able to simply wipe out competition in the search engines, remove parody sites, remove gripe sites, and remove internet content criticizing him, by requesting a judge give him a Preliminary Injunction, and Judge Gloria Navarro did so.

Plaintiff Marc Randazza WON at Document 2 of this case, and completely WON at Document 14, which was the Document that allowed Plaintiff Marc Randazza to SEIZE the intellectual property of Defendant Crystal Cox and Defendant Eliot Bernstein with no due process to the defendants and no First Amendment Adjudication. Plaintiff Marc Randazza was not concerned with a RULING Regarding the \$100,000 he requested per site, that he alleged infringed on his Trademark that did not exist, as having private conversations with Crystal Cox when he was acting as her attorney, he knew full well the financial interests of Defendant Crystal Cox. And have conspired with David Aman, Opposing Counsel in the Obsidian V. Cox case, Plaintiff Marc Randazza knew that Defendant Crystal Cox had a \$2.5 Million Dollar Judgement against her, and the he had no way of getting any money from Defendant Crystal Cox, who has no money or assets.

Further to this effect, Plaintiff Marc Randazza has read depositions, provided to him by David Aman, Opposing Counsel in the Obsidian V. Cox case regarding the assets and financial capability of Defendant Crystal Cox, even though Pro Se Litigant Crystal Cox was not given a copy of these same Deposition Transcripts that David Aman, Opposing Counsel in the Obsidian V. Cox case GAVE, in Conspiracy to Plaintiff Marc Randazza. And thereby, Plaintiff Marc Randazza, knows that Defendant Crystal Cox does not have \$100,000 to pay him, little own the requested \$3 Million.

The major concern to this court should be, how Plaintiff Marc Randazza is able to do this, and how many victims have suffered this same treatment of a First Amendment Attorney taking their first amendment rights and putting them in danger, while ruining their lives and reputations.

**I, Pro Se Defendant Crystal Cox, hereby filed this Amended Pleading,
to Docket Entry 90, which is my ONLY pleading of record in this case.**

**The Following is my Answer to the Original Complaint Filed
by Plaintiff Randazza on November 28th, 2012.**

Though Extortion is not a Civil Allegation on this Complaint, I, Pro Se Defendant Crystal Cox am accused of the Crime of Extortion throughout this complaint and throughout the motions in this proceeding, so I will Address the Allegation of Extortion.

I, Defendant Crystal Cox has not engaged in Extortion.

I, Defendant Crystal Cox DENY the Allegation of Extortion.

Defendant Eliot Bernstein, to my knowledge has never been charged with, investigated nor found guilty of the crime of Extortion.

I Defendant Crystal Cox, have never solicited Plaintiff Marc Randazza or anyone else for money to remove a blog post or to remove any of my investigative reporting articles / blog posts. I have never bought a domain name with the intent to ask for money from anyone that I report on.

I Defendant Crystal Cox have never had a criminal complaint filed against me for Extortion. I Defendant Crystal Cox have never been on trial or investigated for Extortion. I Defendant Crystal Cox am not guilty of extortion, nor have I ever been prosecuted for the crime of extortion. To my knowledge and upon my belief, Defendant Eliot Bernstein has not been on trial for extortion nor investigated for extortion, nor has there ever been a criminal complaint filed against Defendant Eliot Bernstein for the crime of extortion to my knowledge.

Answer to Allegations in Introduction of Complaint

Pro Se Defendant Crystal Cox Defense Regarding the Allegation in the Introduction to this complaint, Allegation 1.)

I, Defendant Crystal Cox have not engaged in an online harassment campaign against any of the Plaintiff's in this complaint. In fact Plaintiff has engaged in an online harassment campaign against me, Defendant Crystal Cox.

I, Defendant Crystal Cox have not EVER bought a domain name related to Plaintiff or anyone else, in effort to extort them or harass them in any way.

I, Defendant Crystal Cox bought domain names that were keyword rich regarding the subject I was reporting on, I am a Media Defendant, and it is standard of practice to have a domain name, a blog with the keywords relating to what that blog is about.

My blogs regarding Plaintiff were to review Plaintiff as he was my attorney at one time. My blogs were also to report on cases Plaintiff was involved in, to Parody Plaintiff, to Criticize Plaintiff, exercise my First Amendment Rights and to report on my own legal case.

My blogs regarding Plaintiff were also a Public service as to warn the public of important related issues, and to report on Public Figure Marc Randazza.

I, Defendant Crystal Cox, never bought a domain name with Plaintiff's last name in it to "capitalize" on Plaintiff's name in anyway, nor have I or Eliot Bernstein, that I know of, ever made ANY money what so ever regarding domain names, or blogs with resembling Plaintiff's name or last name in the blogs.

I, Defendant Crystal Cox have every legal right to own a Domain Name and a blog with the name of anyone in the title, as noted clearly in xxx, case regarding the domain name GlenBeckRapedAndMurderedAYoungGirl.com, in which Plaintiff Marc J. Randazza represented the Domain Name owner and won the right for that person to continue owning and using that Domain Name.

Regarding this same issue of a personal name in a Domain Name, Plaintiff Marc Randazza wrote the following quote which is a letter from Attorney Marc J. Randazza, Plaintiff in this case, to Matthew A. Kaplan Opposing Counsel, and is personally signed by Plaintiff Marc John Randazza.

" View 1 states: "The right to criticize does not extend to registering a domain name that is identical or confusingly similar to the owner's registered trademark or conveys an association with the mark."

View 2 states: "Irrespective of whether the domain name as such connotes criticism, the respondent has a legitimate interest in using the trademark as part of the domain name of a criticism site if the use is fair and non-commercial."

Naturally, View 2 is the prevailing view of American panelists and panels that apply American law to UDRP proceedings. View 1 seems to be more popular with international panelists and panels that apply European law."

Unfortunately, given that UDRP decisions regularly incorporate international legal principles, this case could be assigned to a foreign panelist or to an American panelist who applies transnational principles. I personally would find it distressing if the panel were to make a decision that completely disregards the U.S. Constitution in favor of a foreign perspective that adopts View 1."

"To be candid, we found the fact that Mr. Beck filed this action at all to be most puzzling. Although, it was obvious why he did not file in a U.S. court given the law surrounding nominative fair use of trademarks as fully explained in our Brief. Naturally, a defamation claim as alluded to in Mr. Beck's complaint would be humiliatingly doomed as well in a U.S. court. "

The Document Goes on to Say:

"Accordingly, we found it to be most ironic that Mr. Beck, facing the fact that the U.S. Constitution would stand in his way in a U.S. court, sought to bring this action before an international domain name arbitration panel.

On March 20, 2009, he said on his show:

Let me tell you something. When you can't win with the people, you bump it up to the courts. When you can't win with the courts, you bump it up to the international level.

Of course, we levy no critique at Mr. Beck for seeking to vindicate his perceived rights in this forum. We do not share his opinion as articulated on March 30, and we respect his creativity in seeking an alternate avenue where his claims might have a chance of success. Unfortunately, despite the general wisdom among UDRP panelists, we find that occasionally they render decisions that make First Amendment champions cringe."

"We are certain that despite our disagreement with Mr. Beck's legal position, that all parties involved hold equal reverence for the First Amendment. Therefore, I have prepared a proposed stipulation that will ensure that no matter which panelist is assigned to this case, the First Amendment will illuminate these proceedings like rays of light from the Torch of Liberty."

The Document Goes on to Say:

"I am certain that neither party wishes to see First Amendment rights subordinated to international trademark principles, thus unwittingly proving Mr. Beck's point. Lest this case become an example of international law causing damage to the constitutional rights that both of our clients hold dear, I respectfully request that your client agree to stipulate to the application of American constitutional law to this case. "

Yet, this court continues to favor this SAME attorney as a Plaintiff arguing the Opposite Defense to his own favor, in Randazza V. Cox.

The Document Goes on to Say:

"Irrespective of whether the domain name as such connotes criticism, the respondent has a legitimate interest in using the trademark as part of the domain name of a criticism site if the use is fair and non-commercial."

Eliot Bernstein nor Crystal L. Cox had commercial sites, nor were they in a competing business. Eliot Bernstein got domain names in receivership of a debt Crystal Cox owed him. Crystal Cox used the domain names to seriously criticize Plaintiff / Counter Defendant Marc J. Randazza who she had personal experience of, knowledge of, and who is a Public Figure.

This Hypocrisy of Plaintiff / Counter Defendant Marc J. Randazza, proves yet again that he knew this lawsuit was a frivolous waste of the courts time and the Taxpayers money, yet he sued anyway, in order to retaliate against a woman who he had once represented and who he did not like or approve her on "online speech", regarding her experience with him.

Plaintiff / Counter Defendant Marc J. Randazza is clearly acting outside of the law and is clearly discriminating in who the Constitution applies to and who it does not.

Plaintiff / Counter Defendant Marc J. Randazza should be sanctioned and so should his attorney Ronald D. Green.

The Constitution of the United States and the Laws, should not be disregarded simply to protect the ego of Attorney Marc Randazza.

I, Defendant Crystal Cox have every legal right to make fun of, report on and parody Marc Randazza's wife. This was not out of the blue, the blog posts were making fun of posts on Marc Randazza's own blog discussing a drunken tryst and knocking her up and he may as well marry her. I have every lawful right to make fun of Marc Randazza and his Wife.

I, Defendant Crystal Cox have never had a blog regarding Plaintiff's daughter, this is a false statement by Plaintiff. I have NEVER made a statement online regarding Plaintiff's daughter, he himself has done this, that is a fact.

**I, Defendant Crystal Cox has not engaged in Extortion.
Defendant Eliot Bernstein, to my knowledge has never been charged with,
investigated nor found guilty of the crime of Extortion.**

I Defendant Crystal Cox, have never solicited Plaintiff Marc Randazza or anyone else for money to remove a blog post or to remove any of my investigative reporting articles / blog posts. I have never bought a domain name with the intent to ask for money from anyone that I report on.

I Defendant Crystal Cox have never had a criminal complaint filed against me for Extortion. I Defendant Crystal Cox have never been on trial or investigated for Extortion. I Defendant Crystal Cox am not guilty of extortion. To my knowledge and upon my belief, Defendant Eliot Bernstein has not been on trial for extortion nor investigated for extortion, nor has there ever been a criminal complaint filed against Defendant Eliot Bernstein for the crime of extortion to my knowledge.

I, Defendant Crystal Cox Deny allegations that “Bernstein” has ever conspired with me, Defendant Crystal Cox, or anyone else to my knowledge to extort or harass anyone.

Defendant “Bernstein” has not acted in conspiracy regarding said domain names, and received said domain names in receivership in a prior case and is not a proxy in any way, nor has Defendant “Bernstein” been an author on said blogs connected to said domain names.

I, Defendant Crystal Cox have not engaged in illegal or unlawful acts regarding domain names in ANY way.

Pro Se Defendant Crystal Cox Defense Regarding Introduction Allegation 2.)

I, Defendant Crystal Cox have not “victimized” anyone in any bizarre pattern. I am Media, I have reported on hundreds of people, corporations, companies, attorneys, cases, judges, cops, victims, and businesses over 7 years in my online media, my alternative news. My strategy for getting my online media, the stories I report on strong in the search engines is not about making victims, it is simply the lawful method I use of being better and stronger in the search engine than my competition, which is those competing for the same search engine, keywords. My stories, reporting, is not about baseless accusations, they are all rooted in stories I read, depositions I have read, tips I have received, hearings I have listened to or read, documents I have read and are never baseless.

I, Defendant Crystal Cox have never, EVER, informed anyone that I report on that I would stop reporting on them if they paid me, that is a False Allegation I firmly DENY. I have never “escalated” any reporting due to not being paid, and I have never been paid to STOP reporting on ANYTHING.

Pro Se Defendant Crystal Cox Defense Regarding Introduction Allegation 3.)

U.S. District of Oregon Case Obsidian V. Cox was a Civil Case regarding Defamation Allegations by a Bankruptcy Trustee and had NOTHING to do with Extortion, nor a Domain Name Dispute in any way.

Pro Se Defendant Crystal Cox Defense Regarding Introduction Allegation 4.)

I, Defendant Crystal Cox object to allegations of engaging in pervasive link spamming and cybersquatting against Plaintiff. I, Defendant Crystal Cox was simply reporting on, blogging about, making fun of, criticizing, reviewing and making parody of Plaintiff.

Pro Se Defendant Crystal Cox Defense Regarding Introduction Allegation 5.) 6.)

I, Defendant Crystal Cox Did NOT buy MarcRandazza.com to extort money from Plaintiff. I bought MarcRandazza.com the very day I had a phone conference with Plaintiff to be my attorney and bought MarcRandazza.com to report on my Ninth Circuit appeal as I knew that would be yet another search term in my case, once he began filing on my behalf.

I never, EVER named Plaintiff's child on a blog or blog post ever. I have called Ms. Randazza a Slut and have every constitutional right to do so.

I, Defendant Crystal Cox have never falsified “wrongdoings” to destroy Plaintiff's Reputation. Plaintiff has, however, done that to me in accusing me of Extortion in published material.

I, Defendant Crystal Cox NEVER used MarcRandazza.com as a pay per click, nor ever made money from this site in any way. When you buy a domain name from Godaddy, they park the domain name and they place ads on the domain name. Ads in which Godaddy receives revenue, not me, Defendant Crystal Cox.

" MarcRandazza.me was one of these Domain Names SEIZED by Plaintiff / Counter Defendant Marc Randazza with no Due Process to Pro Se Defendant / Pro Se Counter Plaintiff Crystal L. Cox and Defendant Eliot Bernstein and no First Amendment Adjudication.

MarcRandazza.me was purchased by Pro Se Defendant / Pro Se Counter Plaintiff Crystal L. Cox as a Parody, making fun of Plaintiff / Counter Defendant Marc Randazza. MarcRandazza.me was never a blog, MarcRandazza.me has made ad revenue by Godaddy yet in a fraud on the court RRR claims that Pro Se Defendant / Pro Se Counter Plaintiff Crystal L. Cox made the ad revenue. This domain name was SEIZED, Stolen.

MarcRandazza.me and the "taboo" domain were both parked at Godaddy and never had blogs. Godaddy Inc., Bob Parsons had ads on the parked pages yet Plaintiff / Counter Defendant Marc Randazza claims that Pro Se Defendant / Pro Se Counter Plaintiff Crystal L. Cox did, knowing full well that Crystal Cox was not the one receiving ad dollars. Plaintiff / Counter Defendant Marc Randazza, with actual malice committed fraud on the court and lied regarding Pro Se Defendant / Pro Se Counter Plaintiff Crystal L. Cox and domain names at Godaddy.

Godaddy Inc., Bob Parsons has Pattern and History in freely placing ads on Trademarked Parked Domain Names Godaddy Inc., Bob Parsons are IMMUNE from Legal Action and are able to make ad revenue hand over fist on trade names, trademarked names in a domain name, yet Godaddy Clients, Customers and Domainers are SUED by Attorneys such as Plaintiff / Counter Defendant Marc Randazza.

When a company, say, for example Walmart or Ford, or an Association Say, such as "Realtor" issue a cease and desist or sue a Godaddy Clients, Customers and Domainers for Trademark Infringement, they are satisfied as long as the Godaddy Clients, Customers and Domainers moves the Domain Name to a parked page, vs a blog. They deem the blog or website as stealing their traffic and redirecting their business, however, these companies such as Ford, Walmart, Realtors, as in the example, have no issue with Godaddy Inc., Bob Parsons making that ad dollar revenue of their good name, their trademarked name. This is unlawful, hypocritical, discriminating, unconstitutional and a violation of the legal rights of the Godaddy Clients, Customers and Domainers.

Pro Se Defendant / Pro Se Counter Plaintiff Crystal L. Cox and business partner have been Godaddy Customers since 2005, for years having over 5000 domain names. We have executive account manager, received gifts from Godaddy and constant calls.

YET, when an attorney such as Plaintiff Marc Randazza sues someone like us, a valuable Godaddy Client, Godaddy Inc., Bob Parsons not only sticks up for the attorney, Godaddy Inc., Bob Parsons breaks the laws and UDRP rules in changing servers and violating rights, conspiring with that attorney and against their own clients.

Godaddy sends emails trying to get you to buy domains, yes even trademarked names and names of OTHER PEOPLE. Godaddy gets ad dollars from parked domains even when a domainer is renew them, why? Because Godaddy is "Allowed" to make ad dollar money from PARKED, Trademarked Domain Names but Domainers are NOT.

Godaddy Inc., Bob Parson has been at this racketeering game for Years. Pro Se Defendant / Pro Se Counter Plaintiff Crystal L. Cox will soon be naming Godaddy, Bob Parson, WIPO, Peter L. Michaelson, along with Plaintiff Marc Randazza and other co-conspirators and counter defendants in a Federal RICO Complaint, a Criminal Complaint to the Attorney General and reporting to all authorities the activities of Godaddy, Bob Parson, WIPO, Peter L. Michaelson, along with Plaintiff Marc Randazza and other co-conspirators and counter defendants.

Godaddy Inc., Bob Parson woos their clients at trade shows, sends them special gifts, emails offer non stop. And the biggest Godaddy Clients such as Investigative Blogger Defendant Crystal Cox, when our Domain Names are STOLEN, Godaddy conspires with the Intellectual Property Thieves and violates the rights of long term Godaddy Clients.

Godaddy Inc. lets' buyers spend money on Trademarked Domain Names, and Godaddy Inc. Gives no refund. When Companies such as WALMART and Association such as REALTOR, send a Domainer a cease and desist, they are satisfied if the name is PARKED. Thing is the Domainer PAID for the Domain Names, renewed the Domain Name, Got the Domain Name found in the Search Engines and Godaddy GOT the Revenue from the PARKED Domain Names.

The Courts, WIPO, ICANN, they all side with the Trademark Owner, and AGAINST the Smart, Internet Savvy Domainer. So the Domainer pays for the Domain Name, Gets the Domain Name in the Search, then pays to litigated the loss of the Domain Name and GODADDY gets all the MONEY with NO Liability, EVEN though GODADDY is the One Selling Trademarked Domain Names. Godaddy Auctions Sell Trademarked Names, Domain Name Leasing Sites Lease Trademarked Names and godaddy makes ad Dollars from the ads on the domain names, even the Trademarked ONES."

The Registrar Makes Money, Why Can't The End User?

I, Defendant Crystal Cox NEVER offered to clean up Plaintiff's reputation. Nor had I written a review or made fun of Plaintiff in any way when I asked for a job. I was no source of negative content that I offered to remove, that is a false allegation.

I, Defendant Crystal Cox NEVER offered to remove anything I had posted, for I had posted NOTHING on any blog about Plaintiff when I asked for a job. I posted on blogs later to defend myself after Plaintiff, who was once acting as my attorney, defamed me, attacked me and launched a hate campaign against me.

I, Defendant Crystal Cox never bought a domain name to pressure Plaintiff into do any action what so ever. I, Defendant Crystal Cox never bought a domain name to tamper with a witness.

I, Defendant Crystal Cox OBJECT to number 8.), I have never engaged in a scheme to cyberfly, and never attempted to avoid domain name seizure. These domain names, if anything, are at this point a liability. They cost a yearly fee to renew, plus they are the subject of constant threats at this point, and certainly not anything to hide in a cyberfly scheme, that is simply a false allegation.

I, Defendant Crystal Cox OBJECT to number 9.), I never offered the .me to Plaintiff, I posted a here Kitty Kitty JOKE on my blog about 5 Million Dollars, it was a JOKE.

I, Defendant Crystal Cox Deny violations of the Anti-Cybersquatting Consumer Protection Act.

I, Defendant Crystal Cox OBJECT to number 11.), I have every right to use the word Randazza in my blog names, titles and domain names. Plaintiff is saying this is not defamation and I have every write to my "opinion" yet Plaintiff and this court have already wiped out massive blogs, online content and censored my online speech without adjudication of the First Amendment Issues at concern.

I, Defendant Crystal Cox have every right to push out my competition in a fair marketplace, and to rant, and to have as many websites as I please, that is my constitutional right.

I, Defendant Crystal Cox have NOT violated Plaintiff's Constitutional or Lawful Rights. Plaintiff has, however violated mine.

Regarding Allegations in Number 13.) Claims Jurisdiction Due to the Lanham Act, yet the Lanham Act Does not Seem to Be a Cause of Action. Nevada State Laws do not have jurisdiction over my domain names, nor my blogs, nor my First Amendment Rights.

The First Amendment Rights at issue in this case must be Adjudicated before domain names can be seized, blogs deleted, links broken, and intellectual property taken, irreparable damage caused.

If this court deems Nevada to have jurisdiction, then these blogs can only be blocked for the State of Nevada and NOT the entire world.

Venue and Jurisdiction is Improper. I Object to District of Nevada having Jurisdiction over this matter.

Pro Se Defendant Crystal Cox Defense Regarding Jurisdiction

I, Pro Se Defendant Crystal Cox OBJECT to District of Nevada having Jurisdiction over my blogs, my rights, my domain names, my constitutional rights and Plaintiff's allegations in this matter.

Pro Se Defendant Crystal Cox Defense Regarding "The Parties"

I, Pro Se Defendant Crystal Cox OBJECT to Plaintiff being a Minor, this is unlawful, unconstitutional and Immoral.

Also under "The Parties" is listed large amounts of Domain Names, .blogspot blog names. I, Pro Se Defendant Crystal Cox OBJECT to Plaintiff having any right to said Domain Names in any way. I, Pro Se Defendant Crystal Cox do not own any .blogspot blog, those are owned by GOOGLE, I am a blog author, exercising my First Amendment Rights and do not own blogspot in any way.

Regarding 22.) Eliot Bernstein is NOT a Proxy, nor has EVER been a proxy of any kind in regard to Crystal Cox and has every legal right to own MarcJRandazza.com, FuckMarcRandazza.com, MarcRandazzaSucks.com, and MarcRandazzalsALyingAsshole.com. Plaintiff's name or last name is NOT a household name and Plaintiff has no Trademark on these Names, period.

There is no way that FuckMarcRandazza.com, MarcRandazzaSucks.com, and MarcRandazzalsALyingAsshole.com could be confusingly similar to Randazza Legal Groups Blog or Website. They are obvious gripe sites, critical sites, against Plaintiff and no reasonable reader would confuse them with Plaintiff's commercial blog or website in ANY way.

Defendant Crystal Cox has a Legal Right to operate / own all domain names listed in number 20.) of this complaint, and none would be confused as to be Plaintiff's commercial site.

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, RandazzaLegalGroupSucks.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.

There is no way whatsoever 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.

It is Clear, Obvious and Blatant that Defendant Crystal Cox's blogs are critical of Marc Randazza, she is very vocal about her feelings and experience regarding Plaintiff Marc and her personal experience with Plaintiff Marc Randazza, there is no confusing similarities, there is a distinct difference between the blogs and domain names used for these blogs then a SERVICE connected to Randazza Legal Group.

Defendant 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

No domain name owned or ever purchased by Defendant Cox, is infringing on any Trademark that Plaintiff has, in any way.

Regarding 24) and 26) Plaintiff does not have common law rights to the name Randazza. And if this court claims that Plaintiff does, then surely this is only in the State of Nevada.

Marc Randazza goes by the Trade name "Marco Randazza" as his online Persona. Not Marc Randazza. Plaintiff has NO Trademark on the name "Randazza" or "Marc Randazza".

Regarding 28.) Defendant Crystal Cox has no domain "enterprise". I am Media and I am reporting on, making fun of, criticizing, making a parody of and speak out regarding Plaintiff Marc Randazza, I have every lawful and constitutional right to do so.

Plaintiff Marc Randazza advertises as a Domain Expert, and did not own MarcRandazza.com, my blogs are a public service to expose Plaintiff, make fun of Plaintiff, Parody Plaintiff and warn the public at large.

Pro Se Defendant Crystal Cox Defense Regarding Allegation in number 29

Defendant Crystal Cox nor Defendant Eliot Bernstein have ever registered a domain name in attempt to extort anyone. Defendant Crystal Cox nor Defendant Eliot Bernstein have never had a criminal complaint filed against them for extortion, been on trial for extortion nor been convicted of extortion. If Plaintiff feels he has been extorted by Defendant Crystal Cox nor Defendant Eliot Bernstein, then this would better be in a criminal complaint vs. a civil complaint.

MarcRandazza.me was bought as a joke, and not to PROFIT in any way. It was bought after Plaintiff Filed a Defaming WIPO Complaint. It was offered for \$5 Million just after it was purchased by me, in a blog post titled Here Kitty Kitty, as a Parody, a Joke to all my Readers. This domain name was never a blog or a site, and the only one who made money from it was godaddy with the original purchase fee and the ads that Godaddy placed on the parked page.

Pro Se Defendant Crystal Cox Defense Regarding Allegation in number 30, 31

I, Defendant Crystal Cox DENY the allegation of commercial use. I, Defendant Crystal Cox nor Defendant Eliot Bernstein have made commercial use of any domain names in this complaint. Nor did I sell domain names to a third party. In Fact Plaintiff offered to buy MarcRandazza.com from me and I flat out refused at any price as the record shows. I, Defendant Crystal Cox have made no pay per click money from said domain names, any ads on the parked pages were placed by Godaddy and not by Defendant.

I, Defendant Crystal Cox DENY the allegation in number 31). I have NOT used the said domain name in bad faith, they were used to parody Plaintiff, report on the First Amendment, Make fun of Plaintiff, Criticize Plaintiff, Report on Plaintiff and report on my own legal case, of which Plaintiff was once in negotiations as my acting attorney.

I, Defendant Crystal Cox DENY the allegation in number 31) as having intent to profit, nor did I use Plaintiff's name to sell any Product.

Pro Se Defendant Crystal Cox Defense Regarding Allegation in number 32, 33

I Deny allegations of registering a domain name to get Plaintiff to purchase Reputation Services, this is a FALSE Allegation. I never offered the domain name to Plaintiff EVER. I refused to sell the domain name to Plaintiff, and never held it as some sort of “ransom” in any way, period.

My domain names, blogs, were ALWAYS to parody Plaintiff, report on the First Amendment, Make fun of Plaintiff, Criticize Plaintiff, Report on Plaintiff and report on my own legal case.

I, Defendant Crystal Cox DENY the allegation in the footnotes of page 9 of this complaint that i have engaged in ANY extortion scheme. I have NOT EVER engaged in ANY extortion scheme. I have never extracted money from anyone I report on, nor collected fees for “other third parties”.

I, Defendant Crystal Cox object to number 33 state the “clear meaning”.. that is speculative and not based in ANY fact. I never claimed that I would buy any domain name or post anything online if Plaintiff did not pay me, this is false and fraud on the courts.

I, Defendant Crystal Cox asked Marc Randazza for a job at one point or if he knew anyone that need a search engine marketing expert, he said he did not mind me asking and demanded the domain name I had bought when he was to be my attorney for my PR on my Ninth Circuit appeal, I said I did not want to sell the domain name and he launched a massive, vindictive, retaliation campaign against me. I bought domain names and started blogs to report on this story, to report on him, to warn others what he had done to me, to review his business, to gripe about him, to parody him, to criticize him and in NO way to Extort him in any way.

I, Defendant Crystal Cox have every right to buy and to own the domain name FuckMarcRandazza.com and MarcRandazzaSucks.com - they were not purchased to extort nor to flood the internet with untruthful information. They were AGAIN purchased to to report on this story, to report on Plaintiff, to warn others what he had done to me, to review his business, to gripe about Plaintiff, to parody him, to criticize him and in NO way to Extort him in any way.

I, Defendant Crystal Cox never bought a domain name to intimidate Marc Randazza, that is absurd, Plaintiff would never be intimidated by a purchasing of a domain name. I, Defendant Crystal Cox never bought a domain name to interfere with a witness or to stop Plaintiff from testifying in Obsidian V. Cox's asset probe. As the record shows, I even filed questions I hoped to ask Plaintiff Marc Randazza and to this day have no idea how he got out of that deposition after he was subpoenaed to attend.

I, Defendant Crystal Cox have never purchased a domain name to HARASS Plaintiff.

I, Defendant Crystal Cox object to Plaintiff's attempt to single me out as the only blogger the only media to NOT be able to use his last name in blogs, especially when Plaintiff has blogs in my name and reports on, blogs on me and uses my personal name to do so.

I, Defendant Crystal Cox have NOT harassed Plaintiff's Family in any way. I have simply exercised my First Amendment Rights and have spoke out about my grievances with Plaintiff on keyword rich blogs and domain names. I have every lawful and constitutional right to do so.

Pro Se Defendant Crystal Cox Defense Regarding Allegation in number 41, 42

I, Defendant Crystal Cox have not used domain names to harass and intimidate Plaintiff nor to harm his family or his business, as stated above, domain names and blogs were to gripe, parody, report on, make fun of and review Plaintiff. I have every constitutional right to do so.

I, Defendant Crystal Cox have never had a blog regarding a Janelle Randazza and do not even know who that is. I have never had a blog regarding a three year old child, that is a FALSE allegation as well.

Plaintiff Marc Randazza posted pictures of his child on his blog and gave pictures to Forbes, I posted NO pictures nor did I have a blog regarding Plaintiff's child.

Any pictures of Marc Randazza's wife were from Marc Randazza's blog. If Jennifer Randazza was a private citizen then Marc Randazza should not have had a blog post with her picture and a mixed drink, talking about a drunken tryst and where babies come from. My blog was making fun of Marc Randazza's post on his own wife, it was his picture, NOT mine. I, Defendant Crystal Cox have every right under the First Amendment to Call Marc Randazza's wife a SLUT.

I, Defendant Crystal Cox never got into the search engines nor had a blog regarding the “toddler” discussed in number 42.

Per Footnote on Page 12, I, Defendant Crystal Cox do fully believe that Plaintiff Marc J. Randazza is involved in organized crime and has insiders at Google and Godaddy who do what he wants and violates the rights of his “marks”

Regarding Allegations in Number 46.)

Plaintiff Marc Randazza’s loss of control over his reputation and goodwill has had NOTHING to do with Defendant Crystal Cox nor Defendant Eliot Bernstein. Plaintiff has not suffered any damages regarding Defendant Crystal Cox nor Defendant Eliot Bernstein.

Plaintiff has NO Trademark on the Name “Randazza”

There is no ™ on Marc Randazza’s Blog. And there was no proof given to WIPO of Marc Randazza’s “given name” as I believe his birth name is Marco Randazza and not Marc Randazza. Also note that this Marc Randazza is not the only Marc Randazza in the world and should not have a right to steal this intellectual property as the only rightful owner in the world.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza has Criminally and Civilly Conspired with INTA, Peter L. Michaelson, WIPO and John and Jane Does Regarding the name “Marc Randazza and Fraudulent Trademark Claims.

Regarding Trademark issues, Defendant, Attorney Marc Randazza uses Marco Randazza as his Twitter and YouTube User Name, as well as his username on his own blog. As Seen In Exhibit Q. Defendant, Attorney Marc Randazza had no ™ posted at his blog regarding the name Marc Randazza as beign trademarked and Plainiff Attorney Marc Randazza had no Trademark when purchased Defendant Crystal Cox purchased MarcRandazza.com to use as PR for Defendant Crystal Cox’s highly public First Amendment Case.

Marc Randazza has no common law trademark on his website, he had no Trademark when I purchased the domain names yet seems to have convinced WIPO that he is the rightful owner and has stolen several domain names from myself and Defendant Eliot Bernstein of iViewit Technologies.

Marc Randazza had no lawful Trademark on the name Marc Randazza at the time Blogger Crystal Cox purchased Domain Names, nor at the Time iViewit Technology Eliot Bernstein received Domain Names in Receivership.

Even if Plaintiff Could prove a Trademark, Defendants First Amendment Rights TRUMP Trademark Rights in this case.

Regarding Plaintiff's Discussion of the Lanham Act, Though it does not seem to be a cause of action, Plaintiff lists Lanham in this complaint at various points.

The Supreme Court has recognized the threat to freedom of speech. In *Cohen v. California*, 403 U.S. 15, 25, 91 S.Ct. 1780, 1788, 29 L.Ed.2d 284 (1971), it was decided that the right to speak freely that is guaranteed by the First Amendment to the Constitution of the United States includes the right to criticize others, voice highly controversial opinions, and comment on public interest matters.

The First Amendment also protects free speech of extreme statements and intentional exaggeration when it is clear the statements are insincere and done to frustrate the target, and is not defamation but opinion, satire, or parody.

In *Hustler Magazine v. Falwell*; Parody is NOT Defamation. There are many other cases in which discuss that Parody and Satire is not a Trademark or Defamation Issue. Plaintiff / Counter Defendant Marc Randazza DEFENDS Satire and Parody Blogs, Sites, Domain Names, Content, Radio, Television and More, Constantly,

YET he has committed Fraud on the courts in SEIZING MarcRandazaSucks.com, FuckMarcRandazza.com, MarcRandazzaParody.com, RandazzaLegalGroupSucks.com and other Domain Names and dot blogspots were clearly to express free speech, parody, criticize, speak freely, voice highly controversial opinions, and comment on public interest matters. As was MarcRandazza.com, and all the other blogs, .blogspot and Domain Names, in which this court and WIPO illegally, unconstitutionally SEIZED in favor of Plaintiff Marc Randazza. WITHOUT first adjudicating the First Amendment Issues.

The first step with free speech and the First Amendment and trademark law is whether the speech in question is commercial or noncommercial. Commercial speech is bound by the laws of the Lanham Act and is subject to less and sometimes no First Amendment protection.

Noncommercial speech is not bound by the Lanham Act or trademark law, and is guaranteed complete and full First Amendment protection. In fact, trademark law specifically exempts noncommercial speech so that the law will not infringe on the First Amendment. One case that supports this paragraph is *Taubman Co. v. Webfeats*, 319 F.3d 770, 774-75 (6th Cir. 2003). Another supporting precedent is *Nissan Motor Co. v. Nissan Computer Corp.*, 378 F.3d 1002, 1015-18 (9th Cir. 2004).

Pro Se Defendant Crystal L. Cox and Defendant Eliot Bernstein have made no money from the Seized Domain names. Pro Se Defendant Crystal L. Cox, is an Investigative Blogger, a Media Defendant and was giving Plaintiff Marc Randazza a bad review as she was a former client of Plaintiff Marc Randazza.

Pro Se Defendant Crystal L. Cox was reporting on / blowing the whistle on / investigative blogging on organized crime, porn industry hookers and human trafficking, video technology infringement (iViewit), gang stalkings, threats of violence, intellectual property theft, civil rights violations, civil and criminal conspiracy and more allegedly involving Plaintiff Marc Randazza and his Clients.

There are many cases supporting that negative consumer commentary is core speech protected by the First Amendment. Another case supporting this is, *Bose Corp. v. Consumers Union*, 466 U.S. 485 (1984) Many other cases treat criticisms of a company, their business practices, products and services, as speech protected by the First Amendment. Criticism would be pointless if the person cannot name the company they are bashing by using its trademarks.

The Fourth Circuit explained that just because speech is critical of a corporation or company and its business practices, it is not a sufficient reason to prevent or enjoin the speech. If a trademark owner could “enjoin the use of his mark in a noncommercial context found to be negative or offensive, than a corporation could shield itself from criticism by forbidding the use of its name in commentaries critical of its conduct.” *CPC Int’l., Inc. v. Skippy Inc.*, 214 F.3d 456, 462 (4th Cir. 2000) (quoting *L.L. Bean v. Drake Publishers*, 811 F.2d 26, 33 (1st Cir. 1987)).

Pro Se Defendant Crystal L. Cox as every lawful and constitutional right to criticize Plaintiff Marc Randazza and his Law Firm Randazza Legal Group. Just because speech is critical of a corporation or company and its business practices, it is not a sufficient reason to prevent or enjoin the speech and wipe out massive blogs, links, domain names and content of Investigative Blogger Pro Se Defendant Crystal L. Cox

**Plaintiff Marc Randazza nor Plaintiff Jennifer Randazza
have a Common Law Trademark.**

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza has Criminally and Civilly Conspired with INTA, Peter L. Michaelson, WIPO and John and Jane Does Regarding the name "Marc Randazza and Fraudulent Trademark Claims.

Regarding Trademark issues, Defendant, Attorney Marc Randazza uses Marco Randazza as his Twitter and YouTube User Name, as well as his username on his own blog. As Seen In Exhibit Q. Defendant, Attorney Marc Randazza had no ™ posted at his blog regarding the name Marc Randazza as beign trademarked and Plainiff Attorney Marc Randazza had no Trademark when purchased Defendant Crystal Cox purchased MarcRandazza.com to use as PR for Defendant Crystal Cox's highly public First Amendment Case.

Marc Randazza has no common law trademark on his website, he had no Trademark when I purchased the domain names yet seems to have convinced WIPO that he is the rightful owner and has stolen several domain names from myself and Defendant Eliot Bernstein of iViewit Technologies.

Marc Randazza had no lawful Trademark on the name Marc Randazza at the time Blogger Crystal Cox purchased Domain Names, nor at the Time iViewit Technology Eliot Bernstein received Domain Names in Receivership.

If such names are Trademarked then it is the responsibility of Godaddy to NOT knowingly take the money of their clients knowing full well the names will be taken, and that Godaddy will help the client LOSE the names they paid Godaddy year after year to renew. Godaddy Sells Domain Names that are allegedly Trademarked and those who buy the Names from GoDaddy, are then Liable, even though they have no knowledge of a Trademark.

Plaintiff Marc Randazza has no common law trademark, and if this court rules that Plaintiff Marc Randazza has a common law trademark, then this is only in the state of Nevada.

Plaintiff Marc Randazza has no federal trademark regarding the name Marc Randazza and in fact uses MarcoRandazza on his blogs, his twitter account, his youtube account and other online accounts. Plaintiff Marc Randazza has no legal right to MarcRandazza.com nor any of the other dozens of domain names and blogs that this court has enabled Plaintiff Marc Randazza to seize, delete, change links, divert traffic and ruin my intellectual property.

If this court rules that Marc Randazza has a common law trademark, then it would only be for this state of Nevada. Marc Randazza certainly has no greater common law claim then Proskauer Rose Law Firm, yet Defendant Crystal Cox WON all four WIPO Cases for AllenFagin.com, GreggMashberg.com, JosephLeccese.com and ProskauerLawFirm.com

**Marc Randazza is NOT a common household name.
Marc Randazza has no Trademark, Common Law or Other.**

Because Complainant Marc Randazza has ties to illegal activity, he cannot claim legitimate rights to his name as a famous mark. The doctrine that plaintiff must come into a court of equity with "clean hands" is a reflection of the equitable nature of trademark law. A plaintiff who requests the assistance of a court of equity must not himself be guilty of inequitable conduct.

Marc Randazza, otherwise known as Marco Randazza in which he is really branded as and is his username on his blog, his twitter site and his YouTube page, has ties in family history to the name Randazzo according to genealogy and ancestry sites.

Plaintiff Marc Randazza has no Trademark on the name Marc Randazza. Plaintiff Marc Randazza is not the only Marc Randazza in the entire world. In fact Marc Randazza goes publicly by the name Marco Randazza, as is his YouTube Username, Twitter Username and Username on his own blog of which has no ™, suggesting he believes he has a Trademark on the name Marc Randazza.

Plaintiff Marc Randazza goes by the username MarcoRandazza on Best Tweets Social Media Blog, Username on PhillyLawBlog, Conversations between "Hypen" and "Marco Randazza", Flickr Username, YouTube Username on Multiple Accounts, Gloucester Times Username, The Legal Satyricon, yFrog Social Site, Domain Name Forums, DNF.com, Legal Blog Watch, Bitter Lawyer, Citizen Media Law, Above the Law Blog, Popehat.com, and multiple other sites, forums and blogs, "Marco Randazza" is his Public Persona. Plaintiff Marc Randazza, as seen in Exhibit Q has went by "Marco Randazza" for over 5 years at least.

**Congress has decided that the Lanham Act ONLY applies to commercial speech. Under § 43 (15 U.S.C. §1125) explicitly defines that noncommercial use is not actionable. "The following shall not be actionable under this section: . . .
(B) Noncommercial use of the mark."**

Pro Se Defendant Crystal L. Cox and Defendant Eliot Bernstein, had not commercial motives or "speech" soliciting money in regard to blogs, domains, online media, investigative news blogs in which exposed, created parody and satire, criticized, reviewed, report on Plaintiff / Counter Defendant Marc Randazza and his Clients, Co-Conspirators, Counter Defendants.

Plaintiff Marc Randazza have used the Lanham Act to Suppress Free Speech, Intimidate a Reporter / Whistleblower, and to Steal Massive Content / Intellectual Property AND to Eliminate Search Engine Competition for FREE.

15 U.S.C. § 1125(a) (1). The Lanham Act defines “use in commerce” as meaning “bona fide use of a mark in the ordinary course of trade,” such as using the mark in conjunction with services or goods in commerce. 15 U.S.C. § 1127. Without “use in commerce” “in connection with goods and services,” there is no trademark infringement. *Int’l Bancorp, LLC v. Societe des Bains de Mer et du International Bancorp, LLC*, 329 F.3d 359, 363 (4th Cir. 2003); *People for Ethical Treatment of Animals (PETA) v. Doughney*, 263 F.3d 359, 365 (4th Cir. 2001); see also S. Rep. No. 100-515, at 44 (1988), reprinted in 1988 U.S.C.C.A.N. 5577, 5607 (“Amendment of the definition of ‘use in commerce’ [in § 45 of the Lanham Act] is one of the most far-reaching changes the legislation contains. . . .

The committee intends that the revised definition of ‘use in commerce’ be interpreted to mean commercial use which is typical in a particular industry.”). Basically, the Lanham act excludes all noncommercial speech. *Nissan*, 378 F.3d at 1016-17; see also *TMI, Inc. v. Maxwell*, 368 F.3d 433, 436-38 (5th Cir. 2004), and even excludes commercial speech that does not use marks “in connection with goods or services.” *PETA*, 263 F.3d 359, 365 (4th Cir. 2001).

First Amendment Rights And Constitutional Law trump Trademark law.

The first step with free speech and the First Amendment and trademark law is whether the speech in question is commercial or noncommercial. Commercial speech is bound by the laws of the Lanham Act and is subject to less and sometimes no First Amendment protection. Noncommercial speech is not bound by the Lanham Act or trademark law, and is guaranteed complete and full First Amendment protection. In fact, trademark law specifically exempts noncommercial speech so that the law will not infringe on the First Amendment. One case that supports this paragraph is *Taubman Co. v. Webfeats*, 319 F.3d 770, 774-75 (6th Cir. 2003). Another supporting precedent is *Nissan Motor Co. v. Nissan Computer Corp.*, 378 F.3d 1002, 1015-18 (9th Cir. 2004).

Despite many corporations using intimidation to try to silence people from speaking their minds and using lawsuits, and threats of lawsuits, the Constitution continuously protects free speech.

It excludes commercial speech precisely for the purpose of avoiding infringement of First Amendment rights. *Taubman*, 319 F.3d at 774-75 (6th Cir. 2003); *Nissan*, 378 F.3d at 1016-17. Thus, when an action is brought against a noncommercial use of a trademark for either political or consumer commentary, such as the SLAPP cases with Walmart, Starbucks, and others, the courts do not usually hesitate to grant the defendant full First Amendment protection by holding that trademark law does not apply and that First Amendment protects such speech. See *CPC Int’l*, 214 F.3d at 461-64 (4th Cir. 2000); *Nissan*, 378 F.3d at 1017-18 (9th Cir. 2004); *L.L. Bean*, 811 F.2d at 33.

Noncommercial Speech Is NOT Subject to Trademark Law AND Is Fully Protected by the First Amendment. Trademark law explicitly exempts noncommercial speech such as the alleged emails and website(s) precisely so that the law will not run afoul of the First Amendment. Taubman, 319 F.3d at 774 (6th Cir. 2003); Nissan, 378 F.3d at 1016-17 (9th Cir. 2004). Numerous cases show that consumer commentary is core speech protected by the First Amendment. See, e.g., Bose Corp. v. Consumers Union, 466 U.S. 485 (1984) (New York Times standard applied in libel action brought by a manufacturer claiming that consumer group had maligned its product). Many other cases similarly treat criticisms of a company's products or business practices as speech protected by the First Amendment. The criticisms would be pointless if they did not identify the company they were criticizing and by using its trademarks.

The Fourth Circuit explained: This is an admittedly partisan account and one that vexes [the plaintiff]. Yet just because speech is critical of a corporation and its business practices is not a sufficient reason to enjoin the speech. As the First Circuit stated, if a trademark owner could "enjoin the use of his mark in a noncommercial context found to be negative or offensive, than a corporation could shield itself from criticism by forbidding the use of its name in commentaries critical of its conduct." CPC Int'l., Inc. v. Skippy Inc., 214 F.3d 456, 462 (4th Cir. 2000) (quoting L.L. Bean v. Drake Publishers, 811 F.2d 26, 33 (1st Cir. 1987)).

Congress has therefore limited the application of the Lanham Act to commercial speech. First, § 43(c) expressly excludes non commercial use of marks from the entire section's reach: "The following shall not be actionable under this section: . . . (B) Noncommercial use of the mark." 15 U.S.C. § 1125(c) (4) (emphasis added). Section (c) (4) was added to the Act when it was amended in 1989. The House Judiciary Committee made explicit that the purpose was to avoid any impact on noncommercial speech: The proposed change in Section 43(a) should not be read in any way to limit political speech, consumer or editorial comment, parodies, satires, or other constitutionally protected material.

Noncommercial Speech Is NOT Subject to Trademark Law. Ads placed on Domain Names and Blog in this case, as Plaintiff Marc Randazza knows full well, being an Expert in the Industry, are placed by Google and by GoDaddy and that Pro Se Defendant Crystal L. Cox and Defendant Eliot Bernstein have no control over such ads, and are not involved in a commercial endeavor in REPORTING on Plaintiff Marc Randazza and his Clients, and in reporting on the biggest Technology Theft in the WORLD, iViewit Technology, and it's Founder, Inventor Eliot Bernstein.

Plaintiff Marc Randazza has no Trademark on the name Marc Randazza, yet this court simply favored Plaintiff Marc Randazza and gave him what he wanted, and has thereby PERMANENTLY altered the search engines, removed content on massive blogs, changed thousands of links, and deleted blog / intellectual property of Pro Se Defendant Crystal L. Cox and Defendant Eliot Bernstein.

Plaintiff / Counter Defendant Marc Randazza has no Trademark on the name Marc Randazza, yet this court simply favored Plaintiff Marc Randazza and gave him what he wanted, and has thereby PERMANENTLY altered the search engines, removed content on massive blogs, changed thousands of links, and deleted blog / intellectual property of Pro Se Defendant Crystal L. Cox and Defendant Eliot Bernstein.

**Regarding Cause of Action (1) Violation of Individual Cyberpiracy
Protections under 15 U.S.C. § 8131;**

Pro Se Defendant Crystal Cox DENIES a Violation of Individual Cyberpiracy Protections under 15 U.S.C. § 8131; Defendant ReAlleges all previous Paragraphs in Full.

I, Defendant Crystal Cox Deny registering infringing domain names.

I, Defendant Crystal Cox Deny registering any domain names associate with Plaintiff with a specific intent to profit in any way, nor in "bad faith".

I, Defendant Crystal Cox Deny accusations of attempting to monetize on Plaintiff's name in any way.

I, Defendant Crystal Cox Did not register any domain name regarding Plaintiff in attempt to solicit business of any kind from Plaintiff.

I, Defendant Crystal Cox state that Plaintiff is not entitled to any relief regarding Violation of Individual Cyberpiracy Protections under 15 U.S.C. § 8131; because there was no damage done to plaintiff and there was no violation of this law

I, Defendant Crystal Cox did not register any domain name regarding Plaintiff with the intent to profit and rejected offers to sell domain names. The Here Kitty Kitty, post was a JOKE, no one would pay 5 Million for a Domain Name such as that, bought just days before and with no value created. I have NEVER purchased a domain name associated with Plaintiff's name with intent to sell and profit, proven by my rejection of Plaintiff's offer to buy domain name.

I, Defendant Crystal Cox bought said domain name to review Plaintiff as my attorney, to reporting on Plaintiff, to blog on Plaintiff, poke fun at Plaintiff, criticize Plaintiff, report on first amendment cases and making parody blogs about Plaintiff

I, Defendant Crystal Cox bought said domain name in good faith and under my constitutional rights. And have NOT violated Individual Cyberpiracy Protections under 15 U.S.C. § 8131;

Plaintiff Marc Randazza has no Trademark on the Name Randazza or Marc Randazza.

**Defendant Crystal Cox has NOT violated Cyberpiracy Laws
Defendant Crystal Cox Denies Violation of CYBERPIRACY PROTECTIONS
15 U.S.C. § 8131.**

Defendant Crystal Cox is NOT in VIOLATION OF INDIVIDUAL CYBERPIRACY PROTECTIONS – 15 U.S.C. § 8131. Defendant Crystal Cox has not violated CYBERSQUATTING - 15 U.S.C. § 1125(d). Defendant Crystal Cox has not violated RIGHT OF PUBLICITY – NRS 597.810 COMMON LAW RIGHT OF PUBLICITY, COMMON LAW RIGHT OF INTRUSION UPON SECLUSION and has not committed CIVIL CONSPIRACY.

**Regarding Cause of Action (2) and (3)
Violation of Individual Cyberpiracy Protection - 15 U.S.C. 8131**

Pro Se Defendant Crystal Cox DENIES a Violation of **Individual Cyberpiracy Protection - 15 U.S.C. 8131**

Defendant Crystal Cox did not buy said domain names with intent to profit.

I, Defendant Crystal Cox deny allegations of engaging in pervasive link spamming and cybersquatting against Plaintiff. I, Defendant Crystal Cox was simply reporting on, blogging about, making fun of, criticizing, reviewing and making parody of Plaintiff.

I, Defendant Crystal Cox did not offer to sell domain names to Plaintiff, in fact I rejected Plaintiff's offer to buy domain names as the record shows.

I, Defendant Crystal Cox did not offer to repair any damage that I had allegedly done to Plaintiff. When I asked Plaintiff for a job, I, Defendant Crystal Cox had not written a word on my blogs regarding Plaintiff. When Plaintiff attacked me online line, accused me of criminal activity (Extortion), defamed and attacked me, I, Defendant Crystal Cox used my domain names to expose Plaintiff, make fun of Plaintiff, and warn others of Plaintiff who had been my attorney in negotiations regarding Obsidian V. Cox.

I, Defendant Crystal Cox did not instigate a scheme to smear Plaintiff. I, Defendant Crystal Cox exercised my first amendment right to speak out against Plaintiff, Criticize Plaintiff, Parody Plaintiff and warn others of his behavior from my personal experience, and to post tips I received from whistle blowers regarding Plaintiff.

I, Defendant Crystal Cox never engaged in an extortion scheme, nor any other avenue of profit regarding Plaintiffs alleged "mark".

I, Defendant Crystal Cox have not damaged Plaintiff's nor violated **Individual Cyberpiracy Protection - 15 U.S.C. 8131**, and Plaintiffs are not entitled to relief of any kind.

Regarding Cause of Action (4) (5)
Cybersquatting under 15 U.S.C. § 1125(d);

Pro Se Defendant Crystal Cox DENIES a Violation of "Cybersquatting under 15 U.S.C. § 1125(d)" Defendant ReAlleges all previous Paragraphs in Full.

Domain Names and blogs were not used for commercial purposes, and were NOT purchased with ANY intent to Profit whatsoever. Defendant has not engaged in Extortion with Plaintiff nor anyone Else. Defendant has not been under criminal investigation for Extortion and has not violated **Cybersquatting under 15 U.S.C. § 1125(d)**.

There is no false designation of Origin, or confusion of any kind to any reasonable reader of these blogs or sites, or use of said domain names. The Origin is clear that the blog author is criticizing, mocking, making a parody of, reporting on, and giving their opinion of Plaintiff Marc Randazza and his cases, as he is a Public Figure.

There is no confusion of similar goods or services offered, no commercial advertising or promotions, and no misrepresentation in any way that would confuse a reader that my blogs were connected to Randazza Legal Group, or a similar product or service.

(d) Plaintiff has no "mark" ownership, has no Trademark on the name Randazza or Marc Randazza. Defendant Crystal Cox had no bad faith, and no intent to profit from the alleged "mark".

Plaintiff has No Trademark and Defendant has Not “trafficked” in infringing domain names regarding Plaintiff’s Trademark. Defendant Crystal Cox has not registered domain names to prevent Plaintiff from buying said domain names. Plaintiff had over a decade to buy MarcRandazza.com and as far as the other domain names go, Plaintiff would never have bought those domain names to do business as Attorney Marc J. Randazza of Randazza Legal Group.

Pro Se Defendant Crystal Cox has not registered domain names nor blogs names in bad faith to profit from Plaintiff’s alleged “mark”.

In the Motion for Summary Judgement in this case, Plaintiff states that he does not have a Trademark on the name Randazza or Marc Randazza and therefore this Legal Action is Moot and should be dismissed. Plaintiff admits to having no Trademark as seen in the Motion for Summary Judgement filed against Defendant Crystal Cox. All through this Complaint Plaintiff accuses Defendant of infringing on his Mark, yet admits in a Motion for Summary Judgement that he has no “Trademark”, no “Mark”

Regarding Cause of Action (6) Right of Publicity - NRS 597.810;

Pro Se Defendant Crystal Cox DENIES a Violation of "Right of Publicity" - NRS 597.810. Defendant ReAlleges all previous Paragraphs in Full.

Right of Publicity under Nevada Revised Statute 597.810 does not apply to all Internet activity in all states, this would only apply to those in the State of Nevada viewing my blogs on Nevada Web Servers.

Defendant Crystal Cox had no unauthorized commercial use of said blogs.

Plaintiff has no lawful right to Injunctive Relief. Defendant Crystal Cox has First Amendment rights to own and operate said blogs and domain names. Injunctive Relief is unconstitutional. The Constitution of the United States Trumps Nevada Revised Statute 597.810.

Regarding Cause of Action (7) Common Law Right of Publicity

Pro Se Defendant Crystal Cox DENIES a Violation of "Common Law Right of Publicity". Defendant ReAlleges all previous Paragraphs in Full.

I, Pro Se Defendant Crystal Cox did not registered domain names or blogs to compete with Plaintiff to my commercial advantage.

I, Pro Se Defendant Crystal Cox have had no extortion scheme in any way. Plaintiff has no protected Trademark on the name Randazza or Marc Randazza.

I, Pro Se Defendant Crystal Cox have never had an unlawful enterprise of ANY kind.

I, Pro Se Defendant Crystal Cox have never had a financial gain regarding Plaintiff's name.

Regarding Cause of Action Common Law Right of Intrusion Upon Seclusion;

(Please Note Complaint Says Cause of Action Sixth, However there is already a Cause of Action 6 and X means 10, yet this is number 8.

Pro Se Defendant Crystal Cox DENIES a Violation of "Common Law Right of Intrusion Upon Seclusion". Defendant ReAlleges all previous Paragraphs in Full.

I, Pro Se Defendant Crystal Cox have never posted a picture of Plaintiff's daughter on any blog, nor have I, Pro Se Defendant Crystal Cox written a word regarding Plaintiff's daughter or had a blog regarding Plaintiff's Daughter. Plaintiff, himself gave Forbes Reporter Kashmir Hill pictures of his daughter and she posted those photos on Forbes, Plaintiff posted photos on his blog of this child. I, Pro Se Defendant Crystal Cox did now use the child's name nor photo in any blog.

Plaintiff Jennifer Randazza has photos online of her fashion, and Plaintiff Marc Randazza has photos of her on his own blog. I have name called and reported on Plaintiff Jennifer Randazza and have every constitutional right to do so, and have never done so for commercial reasons.

I, Pro Se Defendant Crystal Cox have called Plaintiff Jennifer Randazza a Slut, and this was after Plaintiff Marc Randazza went on CNN and other publications to defend Rush Limbaugh for calling Sandra Fluke a slut, which was, at the time a highly political topic in mainstream media.

I also had just read a post on Plaintiff Marc Randazza's blog regarding a drunken tryst and knocking Jennifer up, so he may as well marry her. Yes, I called Plaintiff Jennifer Randazza a Slut.

I, Pro Se Defendant Crystal Cox have never used Plaintiff's daughters name in any crusade to extort Plaintiff or anyone else. Nor have I EVER had a Blog Post naming this child in ANY way.

Regarding Cause of Action (9) Civil Conspiracy.

Original Complaint Call It XI. Seventh Cause of Action

Page 20, Line 21, Cause of Action

However, the Top of the Complaint Calls it Cause of Action Number 6.

Pro Se Defendant Crystal Cox DENIES a Violation of "Civil Conspiracy". Defendant ReAlleges all previous Paragraphs in Full.

I, Pro Se Defendant Crystal Cox have never engaged in any kind of Criminal Conspiracy with Eliot Bernstein or anyone else ever.

**Defendant Crystal Cox and Defendant Eliot Bernstein
are NOT involved in a Civil Conspiracy.**

Defendant Crystal Cox is not involved in a Civil Conspiracy.

Defendant Eliot Bernstein, to my knowledge is NOT involved in a Civil Conspiracy.

Plaintiff Marc Randazza is involved in a Criminal and Civil Conspiracy against Defendant Crystal Cox and Defendant Eliot Bernstein to Suppress the iViewit Technology Story and Pressure Defendant to STOP her Ninth Circuit Appeal in Obsidian Finance Group LLC v. Crystal Cox.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza has acted in criminal and civil conspiracy to paint me, Defendant Crystal Cox in false light, defame me and accuse me of a crime in mass media, legal blogs and public radio in order to attempt to discredit my blogs reporting the iViewit Technology Story. And to remove blogs that connect Plaintiff Marc Randazza to those infringing on the iViewit Technology and owing Billions to the iViewit Technology Company, Defendant Eliot Bernstein.

Plaintiff Marc Randazza has Criminally and Civilly Conspired in accusing me, Defendant Crystal Cox publicly of the Crime of Extortion. I, Defendant Crystal Cox have never extorted anyone. I, Defendant Crystal Cox did not ask Plaintiff Marc Randazza for money to remove blog posts.

Plaintiff Marc Randazza offered to buy domain names from Defendant Crystal Cox. Defendant Crystal Cox refused, as the Exhibits to this Complaint Show.

Plaintiff Marc Randazza also offered to buy domain names from Monica Foster aKa Alex Melody, when she refused Marc Randazza threatened her, stole domain names with the use of Jessica Griffin Godaddy Insider. For fear of her life and livelihood Monica Foster aKa Alex Melody Gave MarcRandazza.com back to Defendant Crystal Cox in hopes she would not be stalked, threatened, defamed, beaten or even murdered by Plaintiff Marc Randazza and his connections .

Plaintiff Marc Randazza has Criminally and Civilly Conspired with Godaddy Inc.

On belief and knowledge of Defendant Crystal Cox, Godaddy has Criminally and Civilly conspired with Plaintiff Marc Randazza to steal the following domain names without due process.

marcrandazza.me
marcrandazza.com
marcjrandaazza.com
fuckmarcrandazza.com
marcjohnrandazza.com
marcrandazzasucks.com
marcrandazzaisalyingasshole.com
marcrandazza.biz
marcrandazza.info
marcrandazza.mobi
marcrandazzaparody.com
exposemarcrandazza.com
randazzalegalgroupsucks.com
trollmarcrandazza.com
hypocritemarcrandazza.com
crystalcoxmarcrandazza.com

On belief and knowledge of Defendant Crystal Cox, Godaddy has Criminally and Civilly conspired with Plaintiff Marc Randazza to change domain name servers to point to blog posts inciting hateful and defamatory remarks about Defendant Crystal Cox. Blog posts which are posted by those acting in criminal and civil conspiracy with Plaintiff Marc Randazza to intimidate, threaten, gag, harass Defendant Crystal Cox and to paint a picture that is fraud on the courts to get thousands of blog posts regarding the iViewit Stolen Video Technology, removed from the search engines permanently. This action violates AntiTrust Laws, Fair Competition Laws and Gives Plaintiff Marc Randazza and unfair advantage in the search engines based on Defendant Crystal Cox's, my money, my time, and my intellectual property.

The Above Domain Names were seized in Criminal and Civil Conspiracy with Plaintiff Marc Randazza, GoDaddy, Peter L. Michaelson, WIPO, and Judge Gloria M. Navarro. The Above domain names now link to the following Post Content on Marc Randazza's Blog "The Legal Satyricon" and to a Blog Post Linking to Defamation in Regard to Defendant Crystal Cox and Defendant Eliot Bernstein. Here is what the Domains Link to, as do thousands of internal blog posts.

Marc Randazza's Blog "The Legal Satyricon" Blog Post, Seized Domains Now Link to, BEFORE Defendant Crystal Cox and Defendant Eliot Bernstein was allowed due process of law.

"This Domain Name Seized from Crystal Cox

A number of domain names, formerly registered to the known cyber-extortionist, Crystal Cox, now forward to this post.

On Nov. 30., the World Intellectual Property Organization awarded six of them to me in **Randazza v. Cox**, [WIPO Case No. D2012-1525](#). (Cox's commentary on the case is [here](#))

On Dec. 14, the United States District Court in Las Vegas issued a TRO seizing the rest. See **Randazza v. Cox**, [2:12-cv-02040](#) (D. Nev. Dec. 14, 2012)

I prefer not to comment much on the cases themselves, as there has been plenty of that from third party media sources. However, I have put up this post so that any of the seized domain names can point to this post. If you represent any of Cox's other victims, feel free to email me and I'll be pleased to share my pleadings in these cases.

Here are some selected press accounts of the story:

Forbes: Hill, Kashmir, "[Ugly New Reputation-Smearing Tactic: Going After a Toddler's Internet Footprint](#)" Forbes.com, April 2, 2012.

New York Times: Carr, David, "[When Truth Survives Free Speech](#)" New York Times, Dec. 11, 2011.

Philly Law Blog: Rushie, Jordan, "[The Evolution of Crystal Cox: Anatomy of a Scammer](#)" Philly Law Blog, April 3, 2012.

Forbes: Coursey, David. "[Are Bloggers Really Journalists? Not If They Ask for Money](#)" Forbes.com, March 29, 2012.

Forbes: Hill, Kashmir. "[Why An Investment Firm Was Awarded \\$2.5 Million After Being Defamed By Blogger](#)" Forbes.com, Dec. 7, 2011.

PopeHat: White, Ken. "[Crystal Cox: Not a Free Speech Advocate](#)" Popehat, April 4, 2012.

National Public Radio: Garfield, Bob. "[Combating 'Bad' Speech with More Speech](#)" NPR, On the Media Episode on April 6, 2012.

Photography is Not a Crime: Miller, Carlos. "[Blogger Must Act Like Journalist To Be Treated Like One](#)" Pixiq, December 9, 2011.

I expect even more loony tunes to follow."

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza Criminally and Civilly Conspired with GoDaddy, Peter L. Michaelson, WIPO, and Judge Gloria M. Navarro to seize Defendant Crystal Cox and Defendant Eliot Bernstein's Domain Names and then allow Plaintiff Marc Randazza in conspiracy link those domain names to a blog post doing what Plaintiff Marc Randazza is accusing Defendant Crystal Cox and Defendant Eliot Bernstein of doing. Plaintiff Marc Randazza has linked seized domain names to a blog post in which links to stories, articles, blog posts written by his co-conspirators in effort to defame, harass, intimidate, criminally endanger, and silence Investigative Blogger Crystal Cox.

Defendant Crystal Cox had thousands of linking blog posts, and Plaintiff Marc Randazza has Criminally and Civilly conspired with Godaddy Inc, and the Nevada Courts to wipe out this content, these links, in an unethical, illegal TRO. Godaddy Inc. is financially liable to Defendant Crystal Cox, as is Plaintiff Marc Randazza and Judge Gloria M. Navarro professionally and personally.

Plaintiff Marc Randazza has Criminally and Civilly conspired with Godaddy Inc. and Bob Parsons Godaddy President to tie up domain names for Plaintiff Marc Randazza in a way that violates the legal and constitutional rights of Defendant Crystal Cox and Defendant Eliot Bernstein.

Plaintiff Marc Randazza has Criminally and Civilly conspired with Godaddy Inc. and Bob Parsons Godaddy President to suppress blogs of Defendant Crystal Cox in order to cover up Godaddy's infringement of the iViewit Technology. And to Criminally and Civilly conspire with WIPO, Sony,

Warner Bros., APPLE, MPEG LA, Baryn Futa, Alexis Devane, Peter L. Michaelson, Tonkon Torp Law Firm, Manwin, Corbin Fisher and John and Jane Does who owe Eliot Bernstein and iViewit Technology Billions of Dollars.

In the Summer of 2011 Proskauer Rose Law Firm attempted to Seize Domain Names of Defendant Crystal Cox, in which exposed the involvement of Proskauer Rose Law Firm and Proskauer Rose Attorney Kenneth Rubenstein in the biggest technology crime in the world, the stealing of the 12 Trillion Dollar iViewit Technology, in which Defendant Eliot Bernstein was one of the inventors, and the founder of the iViewit Technology Company. Proskauer Rose Law Firm attempted to Seize Domain Names of Defendant Crystal Cox, in Order to order to silence the investigative blogs of Defendant Crystal Cox. At that time, in 2011 Proskauer Rose Law Firm picked Peter L. Michaelson to be a Panelist, a Sole Panelist. Defendant Crystal Cox objected and demanded a 3 Panel WIPO Arbitration. Peter L. Michaelson reclused himself from the panel before the proceedings started, I assume because Peter L. Michaelson worked at Bell Labs with iViewit Defendant and Co-Conspirator Kenneth Rubenstein, was connected to iViewit Defendant and Co-Conspirator Hon. Judith Kaye, and had connections with Proskauer Rose that were an obvious conflict of interest.

The WIPO Complaint accused Defendant Crystal Cox of "Parroting Eliot Bernstein" and attempted to completely discredit the iViewit Technology Story and the involvement of Proskauer Rose Patent Attorneys in the stealing of the iViewit Technology.

The Domain Names involved in this Dispute were AllenFagin.com, JosephLeccese.com, GreggMashberg.com and ProskauerLawFirm.com - WIPO Case Numbers (TG) D2011-0678, (CT) D2011-0679, (CT) D2011-0677, (CT) D2011-0675 (Complainant Proskauer Rose).

Proskauer Rose Law Firm, at that time requested that Peter L. Michaelson be a Panelist on the WIPO Panel. There were 3 WIPO Panelists on that WIPO Case, Peter L. Michaelson recused himself before the Panel was set, assuming, due to conflicts of interest with Kenneth Rubenstein Proskauer Patent Attorney originally involved in the iViewit Technology theft and connections with AT&T Bell Labs, MPEG LA, and Hon. Judith Kaye.

Defendant Crystal Cox won all 4 WIPO cases against Proskauer Rose.

When Proskauer Rose could not remove the Investigative Blogs of Crystal L. Cox exposing the iViewit Technology theft by Proskauer Rose attorneys to the masses, Proskauer Rose then criminally and civilly conspired with Peter L. Michaelson, WIPO, in order to control the WIPO Decision regarding Marc Randazza Vs. Crystal Cox and Eliot Bernstein.

Proskauer Rose then enlisted, conspired criminally and civilly with Plaintiff Marc Randazza to set a precedence in a court decision to later be used by Proskauer Rose to seize thousands of blogs and hundreds of thousands of blog posts exposing Proskauer Rose involved in the stealing of a 13 Trillion Dollar Technology, the iViewit Technology. Proskauer Rose conspired criminally and civilly with Plaintiff Marc Randazza to use this ill gotten court decision as a basis for future claims against thousands of Defendant Crystal Cox's blogs and the Blogs of Defendant Eliot Bernstein, iViewit Technologies.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza conspired criminally and civilly with David Aman, Steven Wilker and Mike Morgan of Tonkon Torp Law Firm in this matter as well, as they were attorneys for Enron, which collapsed due to deals with Proskauer Rose Law firm regarding the iViewit Technology.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza criminally and civilly conspired with Proskauer Rose to get a "Ruling" that Proskauer Rose can later use to STOP the flow of information regarding the iViewit Technology. Plaintiff Marc Randazza conspired with Tonkon Torp Lawyer David S. Aman to SEIZE the "Right to Appeal" of Defendant Crystal Cox, in a Sheriff Sale of Defendant Crystal Cox's Assets.

Plaintiff Marc Randazza coached, conspired with, counseled Tonkon Torp Lawyer David S. Aman and Steven Wilker Opposing Counsel in regard to seizing Defendant Crystal Cox's right to appeal as an ASSET. Thereby stopping the iViewit Story and the attention coming at the Investigative Blogs of Crystal Cox. Plaintiff Marc Randazza has set out to sabotage Defendant Crystal Cox, in her, my Ninth Circuit Appeal from the Beginning, first as my own attorney negotiating with Tonkon Torp Lawyer David S. Aman on my behalf, allegedly in my best interest.

Plaintiff Marc Randazza conspired criminally and civilly with Jordan Rushie of Mulvihill and Rushie LLC Philly Law Blog, Brown White & Newhouse, Kenneth P. White, Popehat.com, Eric Turkewitz - Turkewitz Law Firm and NewYorkPersonalInjuryAttorneyBlog.com, Scott H. Greenfield of Simple Justice - a New York Criminal Defense Blog, Mark Bennett blog.bennettandbennett.com, Bennett and Bennett, Scott H. Greenfield, Bob Garfield of NPR, David Carr of the New York Times, Kashmir Hill of Forbes and other John and Jane Doe Attorneys and Law Firms, in an online campaign to defame, discredit the blogs of Defendant Crystal Cox and to make her, me look like a Criminal.

Plaintiff Marc Randazza's conspiracy would fail if Defendant Crystal Cox is allowed to go to the Ninth Circuit Appeal and Wins, thereby giving even more credibility to her, my blogs reporting on their criminal and civil conspiracy. Therefore, Plaintiff Marc Randazza conspired criminally and civilly with Tonkon Torp Lawyers to STOP my, Defendant Crystal Cox's Ninth Circuit Appeal.

Plaintiff Marc Randazza criminally and civilly conspired with Tonkon Torp Law Firm, as this lawsuit and Obsidian V. Cox are harassing and intimidating lawsuit that violated my fundamental free speech right and now is trying to be denied a right to appeal.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza criminally and civilly conspired with Tonkon Torp Law Firm to Deny Due Process in opposite constitution rights to appeal. Plaintiff Marc Randazza has committed fraud on this court in claiming the belief that Defendant Crystal Cox is a Montana Resident.

The WIPO Complaint was in the name Reverend Crystal Cox as obtained from the Domain Name Who is Data Base, which also showed I was in Washington State, Plaintiff Marc Randazza criminally and civilly conspired with Tonkon Torp on seizing my "Right to Appeal" as an asset and Plaintiff Marc Randazza is covering up that fact that he knows I am in Washington State, as Plaintiff Marc Randazza has advised David Aman and Steven Wilker of Tonkon Torp Law Firm on how to seize my rights as it pertains to Washington Law and not Montana Law.

On belief and knowledge of Defendant Crystal Cox, When Proskauer Rose Failed at Silencing the Blogs of Investigative Blogger Crystal Cox in the Summer of 2011, Proskauer Rose then Enlisted Co-Conspirators Peter L. Michaelson and Marc Randazza In the Spring of 2012, when Plaintiff Marc Randazza Filed a Domain Name Dispute with the Czech Arbitration Court based in Prague (adr.eu).

The Czech Arbitration Court case worker was Tereza Bartoskova. The Czech Arbitration Court case number was Administrative proceeding No. 100472. This domain name dispute was filed by Plaintiff Marc John Randazza. It was filed against Defendant Crystal Cox and Defendant Eliot Bernstein. Czech Arbitration Court case Administrative proceeding No. 100472 is hereby included as evidence into this case, in its' entirety, including all documents, emails, filings, answers, phone records, and all information in this case

Czech Arbitration Court case Administrative proceeding No. 100472 was cancelled after months of document and exhibit submissions as well as Respondent Crystal Cox's answer being filed. Plaintiff Attorney Marc Randazza did not notify Respondents, Defendant Eliot Bernstein and Defendant Crystal L. Cox.

Plaintiff Marc Randazza then, at some point after this, and with no reason as to why the Czech case was cancelled, Plaintiff Marc Randazza filed a WIPO Dispute.

Respondents, Defendant Eliot Bernstein and Defendant Crystal L. Cox was not notified by Plaintiff Marc Randazza and found out, too late to file a response.

On belief and knowledge of Defendant Crystal Cox, Godaddy Inc. Criminally and Civilly conspired with Plaintiff Marc Randazza, as Godaddy Inc. never unlocked the domain names AFTER Plaintiff Marc Randazza withdrew Czech Arbitration Court case Administrative proceeding No. 100472. Godaddy Inc. Aided and Abetted Plaintiff Marc Randazza to keep Domain Names locked, unlawfully and against UDRP Rules.

Plaintiff Marc Randazza conspired Criminally and Civilly with WIPO, Godaddy Inc., Proskauer Rose Law Firm, MPEG LA, Kenneth Rubenstein, Hon. Judith Kaye, Peter L. Michaelson and other John and Jane Doe's in stealing domain names from Respondents, Defendant Eliot Bernstein and Defendant Crystal L. Cox in order to stop the flow of information regarding the iViewit Technology Theft and the involvement of and infringement of Plaintiff Marc Randazza' clients Manwin, Corbin Fisher and other Porn Industry Companies.

And to protect the illegal technology infringement of Warner Bros., APPLE, MPEG LA, and other John and Jane Doe's. And to protect the involvement of Proskauer Rose Law Firm, Proskauer Rose Patent Attorney Kenneth Rubenstein, Hon. Judith Kaye and other John and Jane Doe's. Judith Kaye and Kenneth Rubenstein are both major iViewit Defendants in RICO and Anti-Trust Lawsuits.

Plaintiff Marc Randazza has Criminally and Civilly conspired with Godaddy Inc. and Bob Parsons Godaddy President to suppress the iViewit Technology Story. Godaddy, and Bob Parsons are infringing on the iViewit Technology, and are invested in multiple companies who also infringe on the iViewit Technology.

On belief and knowledge of Defendant Crystal Cox, Godaddy criminally and civilly conspires with Plaintiff Marc Randazza in not following UDRP Rules, Laws and Regulations, Godaddy simply takes whatever legal document Plaintiff Marc Randazza, Randazza Legal Group gives them and acts in civil and criminal conspiracy to do whatever Plaintiff Marc Randazza tells Godaddy to do.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza has Criminally and Civilly Conspired with Godaddy Inc., this Court, WPO and Judge Gloria Navarro in illegally seizing domain names, redirecting thousands of blog posts and Defendant is entitled to compensation. This court is not a Domain Appraisal Expert, and yet has had Plaintiff Post a Bond of \$100 per blog, per domain. MarcRandazza.com alone is worth Millions, Defendant Crystal Cox's Right to Appeal is with 100's of Billions, Defendant Crystal Cox's Blog network is worth over 100 Million.

If it is not "legal" to own the name of another living individual in a Domain Name then how did Plaintiff Marc Randazza win the right of his client to own GlenBeckRapedandMurderedAyounggirlin1990.com? Also millions of domain names with other people's names in it, are owned by drop companes, just as CrystalL.Cox.com goes to a domain name with advertising on it in chinese. <http://chelywright.com/> , <http://www.brucesewell.com/>, <http://marcrandazza.net/> is a pay per click site, goes to a pay ad site, and millions of other domain names. The domain name registrar often makes this money.

There are thousands of Parody, Satire Sites, of which **Plaintiff Marc Randazza is an advocate for many of these sites**, yet my sites were shut down, my domain names seized and without due process. Even names such as MarcRandazzaParody.com, HypocriteMarcRandazza.com and CrystalCoxMarcRandazza.com, there by in one unconstitutional swoop, stopping Defendant Crystal Cox from making a Parody Regarding Marc Randazza. This violates my due process and has caused damaged to my online network, as well as defamed me, as these domain names now link to a blog post on Plaintiff's blog that defames me.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza and his Attorney Co-Conspirators teach others how to steal domain names. This is a YouTube Comment from CaptainObvious, believed to be Kenneth P. White of Brown, White and Newhouse.

"Captain Obvious 3 weeks ago

Everyone who is a victim of Cox needs to know they can win against her. Do NOT make the following mistakes (1) seeking a multi-member panel - that is a typical large firm response to an idea (2) going after trademark rights (3) don't treat the arbitration like a complaint that can be amended or augmented with discovery – treat it like an arbitration."

The "Victims" he speaks of are those I report on, expose in my online media, which is my Free Speech Right to do so. He is telling them how to steal domain names. In Conspiracy with WIPO, INTA, and Godaddy. Plaintiff Marc Randazza has used this Nevada Court to alter the search engines, Violate My Free Speech Rights in Mass, Defame me, Plaintiff Crystal Cox, Harass Me, steal my intellectual property and suppress my blog posts exposing Plaintiff Marc Randazza and his connection to those who have stolen the iViewit Technology.

Redirecting Plaintiff Crystal Cox's domain names in conspiracy is a theft, a crime, an AntiTrust Violation, Fair Competition Law Violation and is fraud on this court. Godaddy Inc. who Sold the Domain Names, illegally gave the domain names to Plaintiff Marc Randazza, changing the server and breaking thousands of links forever.

**Plaintiff Marc Randazza has acted in Criminal and Civil Conspiracy
against Defendant Crystal Cox**

Defendant Crystal Cox has NOT been involved in any conspiracy against Plaintiff Marc Randazza. In Fact, Plaintiff Marc Randazza has been involved in Criminal and Civil Conspiracy against Defendant Crystal Cox.

Defendant Crystal Cox's Independent Investigative Blogger, blogs are solely owned and operated by Defendant Crystal Cox, with the exception of other news entries / posts by journalists / investigative bloggers from time to time, including full time investigative blogger Michael Spreadbury posts. Defendant Eliot Bernstein has never, ever posted, written on Defendant Crystal Cox's blogs.

Defendant Eliot Bernstein has had his rights violated, due process violated and has been a victim of this court. Defendant Eliot Bernstein has lost domain names and future value in other domain names due fraud on this court acting in conspiracy with Godaddy Inc., Bob Parsons and Plaintiff Marc Randazza to seize domain names, delete thousands of blog posts from the search engines, steal intellectual property and all to suppress the biggest Technology Crime in the World Ever, the Criminal and Civil Conspiracy of the iViewit Stolen Technology.

Defendant Eliot Bernstein is not a proxy, was never engaged in any cyberfly activity and is the rightful owner of domain names stolen in conspiracy with this court, conspiracy with Godaddy Inc., Bob Parsons and Plaintiff Marc Randazza.

Defendant Eliot Bernstein agreed to assume Domain Names in lieu of debt because many of the domain names are evidentiary links in his Federal RICO and ANTITRUST lawsuit, to Whistleblower Christine C. Anderson and ongoing Federal Investigations. And these domain names assumed by Defendant Eliot Bernstein in receivership are also used in State, Federal, and International Criminal Complaints as Exhibits.

Defendant Eliot Bernstein is not responsible for content on the blogs of Defendant Crystal Cox and received ownership of domain names through receivership, due to a debt owed by Defendant Crystal Cox to Defendant Eliot Bernstein of which the Obsidian V. Cox court records, depositions and documents clearly show. Plaintiff Marc Randazza has acted in criminal conspiracy with (THE BLOGGERS) to deliberately paint Eliot Bernstein in False Light, Violate his individual rights, violate his constitutional rights and accuse him of a crime in public forums.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza has acted in criminal conspiracy to suppress the iVeiwt Technology story to, in conspiracy protect his clients Hunter Moore, Liberty Media Holdings, Corbin Fisher, Manwin and other John and Jane Does. Defendant Eliot Bernstein is one of those I write about, one of those stories that I report on in order to expose corruption in the courts.

Plaintiff Marc Randazza calling those I write about "victims" is false and perpetrates a fraud on the court. They are people, companies I Report on, of which I, Defendant Crystal L. Cox have been proudly doing in my own name for a decade.

**Plaintiff Marc Randazza has Criminally and Civilly Conspired with
John C. Malone and Liberty Media (LINTB).**

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza has acted in criminal conspiracy with John C. Malone, Rich Baer, Evan D. Malone, David E. Rapley, Larry E. Romrell, Donne F. Fisher, Gregory B. Maffei, Andrea L. Wong, Robert R. Bennett, M. Ian G. Chilchrist, and Liberty Media (**LINTB**) and Liberty Media (**LINTB**) owned companies PBS, Sprint Nextel Corporation, Starz, Time Warner Cable, Time Warner Inc., Viacom Inc., Centurylink, Crown Media Holdings, Liberty Associated Partners LLC, Barnes and Noble, Liberty Media Corporation, Acquire Media, Associated Partners L.P., MacNeil/Lehrer, Live Nation Entertainment Inc., Kroenke Arena Company LLC, Atlanta National League, Corbin Fisher, Brazzers, Encore, E! Entertainment, Time Warner Entertainment, Nine German Owned Cable Companies, Manwin, Discovery Channel, News Corporation, QVC, AT&T, Gary Magness, Magness Securities, Paul A. Gould, Jerome H. Kern, Kim Magness, Charles Y. Tanabe, TCI, Liberty Media Holdings, Xbiz, Corbin Fisher, Playboy, Hustler, The Weinstein Company, Playboy Enterprises, Warren Buffet, Disney, Netflix, APPLE, Liberty Media Corp NASDAQ:LMCA, and John and Jane Doe's.

These Liberty Media Holdings are named in the iViewit RICO Complaint, RICO Lawsuit, SEC Complaint, USPTO Complaint, New York Whistleblower Whitewashing Cases, Attempted Murder and Car Bombing cases involving iViewit Technology, Florida Bar Lawsuits, Department of Justice Investigations and more.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza has acted in criminal conspiracy with John C. Malone and Liberty Media (**LINTB**) and affiliated companies in order to suppress the iViewit Technology story because his client Liberty Media / Liberty Media Holdings LLC who owns part of Time Warner Inc., Time Warner Cable and Viacom, as well as Part or All of the Following who infringe on the iViewit Technology: Encore, Startz, **TCI Ventures Group LLC, ATT, Liberty Digital Inc., TCI Satellite Entertainment Inc, Discovery Channel, News Corporation, Netflix, QVC, MediaOne Group, CBS, The Weinstein Company, Liberty Capital, Corbin Fisher**, Liberty Global, Belgium's Telenet Group Holding, Sirius Radio, Barnes and Noble, Discover Communications, Malone Family Foundation, in Connection with the Cato Institute, and other Jane and John Doe's to be added.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza has acted in criminal conspiracy with John C. Malone and all owned companies and associated people above, in a massive deception, fraud on shareholders. Plaintiff Marc Randazza, John C. Malone, Rich Baer, Evan D. Malone and all above know of Liberty Media infringing on the iViewit Video Technology and the massive liability this is to Liberty Media and all people, companies, shareholders listed above in connection to Liberty Media owned companies.

Plaintiff Marc Randazza has acted in criminal conspiracy with John C. Malone and Liberty Media to commit Shareholder Fraud, Insider Trading, Sec Violations, Anti-Trust Violations, Securities Fraud and continued infringement on the iViewit Video Technology in spite of known NDA's, Legal Contracts, Inventors Rights and the FACT that Plaintiff Marc Randazza, Liberty Media and John C. Malone knowingly fail to disclose this Trillion Dollar Liability to shareholders of Liberty Media and Associated Companies.

Plaintiff Marc Randazza has conspired Criminally and Civilly with John C. Malone, Liberty Media, Time Warner Inc., Viacom, MPEG LA, Proskauer Rose Law Firm, Patent Attorney Kenneth Rubenstein, INTA, Peter L. Michaelson, Francis Gurry, WIPO, Bell Telephone Laboratories, AT&T, Stephen Lamont, Warner Bros., AOL, SONY, and other John and Jane Doe's to remove information from the Internet Regarding the worlds largest technology crime, the theft of the iViewit Technology by Proskauer Rose Patent Attorneys and Co-Conspirators. And to remove information regarding their involvement in stealing, infringing on the iViewit Technology.

On belief and knowledge of Defendant Crystal Cox, John C. Malone began his business career at Bell Telephone Laboratories of AT&T. Kenneth Rubenstein, the Head Proskauer Rose Patent Attorney involved in criminal and civil conspiracy of stealing the iViewit was at Bell Labs associated with John C. Malone and WIPO Panelist Peter L. Michaelson. Plaintiff Marc Randazza has conspired Criminally and Civilly with John C. Malone, Kenneth Rubenstein, Peter L. Michaelson, Liberty Media and other John and Jane Doe's in intimidating, harassing, defaming, criminally endangering, Defendant Crystal Cox and Defendant Eliot Bernstein.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza has conspired Criminally and Civilly with John C. Malone, Kenneth Rubenstein, Peter L. Michaelson, Liberty Media, Godaddy, Judge Gloria M. Navarro and other John and Jane Doe's to remove thousands of blogs posts and associated links exposing those involved in the iViewit Technology Theft. And Criminally and Civilly to steal domain names, redirect domain names, and steal intellectual property, personal property of Defendant Eliot Bernstein, iViewit Founder and of Defendant Crystal Cox in order to suppress information involving the iViewit Company, and the known technology infringement of Plaintiff Marc Randazza and Jordan Rushie, Philly Law Blog client Liberty Media, John C. Malone and All Associated Companies infringing on the iViewit Technology.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza has conspired Criminally and Civilly with John C. Malone, Liberty Media, McKinsey & Company, John Calkins, Warner Bros., Time Warner Inc., SONY Entertainment, Doug Chey, Scott Sherr, Todd Outten, AOL, Tracy L. Coenen, Tim Cook, Julie Jacobs, Warren Lieberfarb, Lieberfarb and Associates, Sony Pictures Entertainment, Intel, Bruce Sewell, H. Hickman Powell, Crossbow Ventures, Chuck Dages, Alan E. Bell, Kenneth Rubenstein, WB Online, Sam Smith, Joe Annino, Jack Scanlon, Real Producer, WMP Developer Guides, Media Cleaner Pro, AOLTW, Microsoft, Toshiba, Best Buy, Samsung, Columbia House,

and John and Jane Doe's in removing blogs reporting on the suppressing information regarding massive shareholder fraud, racketeering, sec fraud, suppressing and removing iViewit Technology, stealing domain names related to the iViewit Technology theft story, removing blogs from the search engines related to the iViewit Technology theft and in intimidation - defamation - harassment campaigns against Investigative Blogger Defendant Crystal Cox and against Investigative Blogger Monica Foster aKa Alex Melody and Diana Grandmason aKa Desi Foxx, who are both named in Plaintiff Marc Randazza's complaint against Defendant, Investigative Blogger Crystal L. Cox by Plaintiff Marc Randazza in criminal and civil conspiracy .

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza has conspired Criminally and Civilly with John C. Malone, Liberty Media and John Calkins of SONY. Both John C. Malone and John Calkins were with McKinsey & Company. John Calkins is the Executive Vice President of Global Digital and Commercial Innovation for Sony Pictures Home Entertainment, and was at Warner Bros. when Warner Bros. Signed NDA's - Non Disclosure Agreements Regarding the iViewit Video Technology, and is one of the original co-conspirators in the iViewit Technology Theft, involving his direct connection with Warner Bros. and SONY, and massive shareholder fraud in not disclosing this liability.

On information and belief that Plaintiff Marc Randazza may be connected to the murder of Donny Long, there's is an investigation over this, at this time, and Donny Long has not appears. I have information and belief that Plaintiff Marc Randazza is connected to Porn WikiLeaks, and Sean Tomkins, with the aid of J. Malcom Devoy and Randzza Legal Group harass those who threaten to tell

Plaintiff Marc Randazza has Criminally and Civilly Conspired with Multiple Legal Bloggers, CPA's Attorneys and Journalist in an Whistleblower Retaliation Harassment Campaign

Defendant Crystal L. Cox has NOT acted in **an online harassment campaign**. Defendant Crystal L. Cox has reported on Plaintiff Marc Randazza. Defendant Crystal L. Cox has posted tips, personal experience, parody, reviews and information regarding Plaintiff Marc Randazza.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza, as Exhibits A-Z attached to this complaint Show has acted in criminal and civil conspiracy with 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, SiouxsieLaw.com, SequenceInc.com Tracy Coenen, Mark Bennett blog.bennettandbennett.com, Bennett and Bennett, Scott H. Greenfield, Carlos Miller, Eric Turkewitz - Turkewitz Law Firm and

NewYorkPersonalInjuryAttorneyBlog.com, Scott H. Greenfield of Simple Justice - a New York Criminal Defense Blog and blog.simplejustice.us, Carlos Miller of PixIQ.com and PhotographyisNotaCrime.com, Las Vegas Review-Journal, the Las Vegas Sun, VegasInc, Las Vegas CityLife, Las Vegas Weekly, Stephens Media and other John and Jane Doe's in an Online Hate, Defaming, Criminal Endangerment, Information Suppressing, Whistle Blower Retaliation Harassment Campaign.

Tracy Coenen's Blog, the Fraud Files, Says this about Defendant Crystal Cox, **"She posted defamatory things on the websites at those domain names, and offered to remove the content if Randazza paid her enough."** This is not fact and is defamation against Defendant Crystal Cox with actual malice, knowing full well that Defendant Crystal Cox has not been convicted of the crime of extortion. This is information she got from Plaintiff Marc Randazza.

There is no proof that Crystal Cox posted **"defamatory things on the websites at those domain names, and offered to remove the content if Randazza paid her enough"** I, Crystal Cox, had no websites about Marc Randazza when I emailed him. I bought domains and started blogs to FIGHT BACK in the search engines, when, a man (Plaintiff) who was once acting as my attorney contacted Opposing Counsel to Conspire to set me up for extortion, in an act of revenge because I had a domain name he wanted and refused to simply give it to him and do as he told me to do. I, Crystal Cox, NEVER, EVER **"offered to remove the content if Randazza paid her enough"**, There is no Factual Base for that Defamatory LIE, none what so EVER.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza has Criminally and Civilly Conspired with the above in order to defame, harass, intimidate investigative bloggers and those who speak out about the Porn Industry Companies he represents. Plaintiff Marc Randazza has Criminally and Civilly Conspired with the above in order to get them to back down from legal actions that affect the financial bottom line of Liberty Media and other Co-Conspirators.

Liberty Media Holdings, Using Randazza Legal Group, (Marc Randazza, J. Malcom DeVoy, and Ronald Green), and Mulvihill & Rushie LLC, Jordon Rushie SUE people and companies OFTEN for what they "ALLEGE" to be copyright infringement and downloading PORN that they allegedly OWN. However, Liberty Media Holdings and Companies they own stake in, are INFRINGING on the iViewit Video Technology in these Porn Videos and have NEVER paid, Eliot Bernstein of iViewit Technology or any of the other Video Technology Inventors or Shareholders. Plaintiff has used this complaint to suppress my blogs exposing the iViewit Technology infringement and to attempt to discredit Eliot Bernstein.

Liberty Media Holdings has massive Liability that they have NOT disclosed to Shareholders regarding the iViewit Video Technology, and Liberty Media Holdings Lawyer Randazza Legal Group SUEd Inventor Eliot Bernstein of iViewit Technology over Domain Names to WIPE out the Investigative Blogs of Crystal L. Cox, reporting on the iViewit Technology Story that directly affected the STOCKS, Profit of Liberty Media Holdings.

Upon Knowledge and Belief of Defendant Crystal Cox, Plaintiff Marc Randazza has Criminally and Civilly Conspired with the above in massive shareholder fraud campaign, and fraud on the courts, misrepresentation to the court.

Defendant Crystal L. Cox has never extorted Plaintiff Marc Randazza.

Defendant Crystal L. Cox has never received money from Plaintiff Marc Randazza nor has Defendant Crystal L. Cox demanded money from Plaintiff Marc Randazza nor threatened any action if Plaintiff Marc Randazza did not pay Defendant Crystal L. Cox.

Defendant Crystal L. Cox has not engaged in cybersquatting and spamming Plaintiff Marc Randazza. Defendant Crystal L. Cox has a proprietary method of getting her news stories found strong in the search engines , this is in no way cybersquatting and spamming.

Defendant Crystal L. Cox did NOT Register MarcRandazza.com to Extort Plaintiff Marc Randazza nor did Defendant Crystal L. Cox demand money from Plaintiff Marc Randazza. Defendant Crystal L. Cox bought MarcRandazza.com to do PR on her own legal case.

Defendant Crystal L. Cox did not buy Domain Names regarding the name "Randazza" for any commercial reason, nor did Defendant Crystal L. Cox place pay per click ads or receive pay per click ad money. Godaddy Inc. Placed Ads and Received money for those ads.

Defendant Crystal L. Cox never offer to clean up the reputation of Plaintiff Marc Randazza.

Defendant Crystal L. Cox did not buy domain names to tamper with a witness. Defendant Crystal L. Cox bought domain names to get the story heard, and to fight back with the truth regarding the intimidations, harassment, painting in false light, civil and criminal conspiracy in which Plaintiff Marc Randazza was involved in against Defendant Crystal L. Cox in order to suppress the iViewit Technology story and the truth about Plaintiff Marc Randazza's involvement to STOP the iViewit Story and save his clients 100's of Billions of Dollars, Literally.

In fact, the record shows that Defendant Cox stated I, she wanted to go to Portland to Marc Randazza's Deposition and question him myself. Plaintiff Marc Randazza was Subpoenaed in Obsidian V. Cox, after the Trial. I am Pro Se in this matter and received copies of the Marc Randazza Subpoena. Exhibit B shows the questions I intended to ask Marc Randazza at this deposition in which he somehow managed to fail to show up to.

Defendant Crystal L. Cox bought **MarcRandazza.me** as a Parody, a Satire, as a Joke and Defendant Crystal L. Cox never offered Plaintiff Marc Randazza the domain name for 5 Million. Defendant Crystal L. Cox titled that post here "Here Kitty Kitty", as a Joke simply to stand up to those attacking Defendant Crystal L. Cox and let them know that though they have created mass blogs spewing hate and lies about Defendant Crystal L. Cox, and threatened me, pushed me to stop my Ninth Circuit Appeal, I would persevere. It was my way of saying You Will NOT Kill my Spirit you EVIL Assholes.

On belief and knowledge of Defendant Crystal Cox, This Court has worked in Criminal and Civil Conspiracy with INTA, WIPO, Godaddy Inc., and Plaintiff Marc Randazza to Steal **MarcRandazza.me** .

Plaintiff Marc Randazza Violated Attorney Client Privilege

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza acted as Defendant Crystal Cox's attorney. Plaintiff Marc Randazza negotiated a deal with Opposing Counsel in Obsidian V. Cox, based on conversations with Defendant Cox and acting as her attorney. Plaintiff Marc Randazza has violated my rights as his client, violated my privacy, violated my constitutional rights, violated my right to due process, violated my intellectual property right, Violated Attorney Privilege, committed a Hate Crime against me, defamed me, threatened me, harassed me and has engaged in painting me in false light and criminal endangerment, for over a year. Defendant Crystal Cox is entitled to compensation.

Plaintiff Marc Randazza has Criminally and Civilly Conspired with Godaddy Inc. and Judge Gloria M. Navarro in mass intellectual property theft.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza has had massive Google Blogger Blogs removed by getting his ring of bloggers, attorneys, in criminal and civil conspiracy to mark them as spam from so many directions that Google has no choice but to remove the blogs regarding the iViewit Video Technology story. Plaintiff Marc Randazza has acted with Co-Conspirator re-alleged from this entire response in removing and attempting to remove, silence, suppress Blogs in which are named in Federal Investigations, Whistle Blower and Whitewashing Cases, SEC Complaints, RICO Complaints, and more ongoing federal investigations regarding the iViewit Technology Case.

The Following Blogs were seized, removed, deleted by Plaintiff Marc Randazza and his Co-Conspirators to intimidate, harass, criminally endanger, Defendant Crystal Cox, in order to remove content regarding the iViewit Technology story and attempt to set precedence for Proskauer Rose and other Co-Conspirators to do the same thing, and thereby wipe out the iViewit Stolen Technology story and all blogs who report on the iViewit Technology Theft.

marcjohnrandazza.blogspot.com
 randazzalegalgroup.blogspot.com
 marcrandazzaviolatedmylegalrights.blogspot.com
 markrandazza.blogspot.com
 marcrandazza.blogspot.com
 jenniferrandazza.blogspot.com
 marcrandazzafreespeech.blogspot.com
 marcrandazzaegomaniac.blogspot.com
 marcjrandaZZa-lawyer.blogspot.com
 marc-randazza.blogspot.com
 marcrandazzawomensrights.blogspot.com
 marcrandazza-asshole.blogspot.com>
 marcrandazzatips.blogspot.com>
 marcrandazzaabovethelaw.blogspot.com

Plaintiff Marc Randazza has Criminally and Civilly Conspired with Wordpress, Insiders at Google and a Ring of Attorneys Marking Blogs as Spam to remove information regarding the stolen iViewit Technology and the involvement of Marc Randazza's clients and co-conspirators.

Plaintiff Marc Randazza has had massive wordpress blogs removed, videos removed and flagged in civil and criminal conspiracy in order to remove information regarding the iViewit Video Technology story.

Plaintiff Marc Randazza has Criminally and Civilly Conspired with WIPO Panelist Peter L. Michaelson in Domain Name Theft, Removal of iViewit Content Online, Public Defamation, Harassment, and illegally stating that Defendant Eliot Bernstein and Defendant Crystal Cox are Guilty of the Crime of Extortion, of which Defendant Eliot Bernstein nor Defendant Crystal Cox are guilty of or have been investigated for.

In Motions Throughout this Case and in the Original Complaint Against Defendant Crystal Cox and Defendant Eliot Bernstein, Plaintiff Randazza quotes Sole WIPO Panelist Peter L. Michaelson, Plaintiff uses these quotes as evidence against Defendant Crystal Cox and Defendant Eliot Bernstein, YET when Pro Se Defendant Crystal Cox quotes Sole WIPO Panelist Peter L. Michaelson, and explains her defense, Plaintiff objects and states that my discussion of Sole WIPO Panelist Peter L. Michaelson is irrelevant to the allegations in this complaint. I, Pro Se Defendant Crystal Cox, have a right to address the Sole WIPO Panelist Peter L. Michaelson WIPO Decision, as Plaintiff has addressed throughout this case, in my Defense of Said Allegations, Accusations.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza conspired Criminally and Civilly with Peter L. Michaelson, who was the Sole WIPO Panelist. Peter L. Michaelson Criminally and Civilly Conspired with Plaintiff Marc Randazza in order to seize domain names that exposed the iViewit Technology Story. Peter L. Michaelson, WIPO Panelist has undisclosed conflicts of Interest with close ties with Plaintiff Marc Randazza and INTA connections and witnesses say they have met at INTA meetings on a regular basis and have a personal relationship.

Peter L. Michaelson, WIPO Panelist has undisclosed conflicts of Interest and has acted Criminally and Civilly with Kenneth Rubenstein, MPEG LA lead patent attorney, who is a Proskauer Rose Attorney that was iViewit's Patent Attorney, whom is the lead on the Stealing of the iViewit Technology.

On belief and knowledge of Defendant Crystal Cox, In Criminal and Civil Conspiracy with Plaintiff Marc Randazza, Sole Panelist Peter L. Michaelson has defamed Defendant Crystal Cox and iViewit Founder / Inventor Defender Eliot Bernstein. Sole Panelist Peter L. Michaelson has massive, undisclosed conflicts of interest in this WIPO decision.

In this WIPO case Sole Panelist Peter L. Michaelson has accused me, Defendant Crystal L. Cox and Defendant Eliot Bernstein of the Crime of Extortion. This was done in criminal and civil conspiracy with Plaintiff Marc Randazza, Proskauer Rose, Kenneth Rubenstein and WIPO.

Sole Panelist Peter L. Michaelson knows that Defendant Eliot Bernstein and Defendant Crystal Cox was not under criminal investigation for Extortion, and Sole Panelist Peter L. Michaelson knows that Defendant Eliot Bernstein and Defendant Crystal Cox has had no criminal charges filed, no criminal trial, and certainly no criminal conviction of any kind. Defendant Eliot Bernstein and Defendant Crystal Cox was not on trial for Extortion nor has Defendant Eliot Bernstein nor Defendant Crystal Cox had a criminal extortion complaint filed. Sole Panelist Peter L. Michaelson, in criminal conspiracy with Proskauer Rose and

Plaintiff Marc Randazza flat out states that Respondent Eliot Bernstein and Crystal Cox are guilty of the crime of extortion.

Sole Panelist Peter L. Michaelson accused Defendant Eliot Bernstein and Defendant Crystal Cox of the Crime of Extortion in a WIPO decision that is now picked up by Big Media, Countless Bloggers and is published globally in legal documents, dockets, intellectual property blogs magazines, and more. Therefore, Sole Panelist Peter L. Michaelson has massively defamed and criminally endangered Defendant Crystal Cox and Defendant Eliot Bernstein, as well as interfered with ongoing iViewit Technology investigations by these false Criminal Allegations of iViewit Founder Defendant Eliot Bernstein.

Sole Panelist Peter L. Michaelson's accusations in a distinguished WIPO Decision has massively defamed Defendant Eliot Bernstein and Defendant Crystal Cox. This has lead to character attacks, further defamation and incited hate toward Investigative Blogger Defendant Crystal L. Cox.

Sole Panelist Peter L. Michaelson took the word of the Plaintiff Marc Randazza, a Las Vegas Porn Attorney, over the word and documented proof of Defendant Crystal Cox.

Sole Panelist Peter L. Michaelson did no fact check or investigation into the allegations of Extortion. Sole Panelist Peter L. Michaelson simply accused Defendant Eliot Bernstein and Defendant Crystal Cox of Extortion in a WIPO Decision.

WIPO is not a Criminal Investigation Court. WIPO is not a Judge and a Jury. Yet Sole Panelist Peter L. Michaelson in conspiracy with WIPO, Proskauer Rose and Plaintiff Marc Randazza took it upon himself to convict Defendant Eliot Bernstein and Defendant Crystal Cox of Extortion.

Co-Conspirator, Sole Panelist Peter L. Michaelson in conspiracy with WIPO, Proskauer Rose and Plaintiff Marc Randazza has violated the constitutional and intellectual property rights of Defendant Eliot Bernstein and Defendant Crystal Cox.

Sole Panelist Peter L. Michaelson, in criminal conspiracy with Proskauer Rose, WIPO and Plaintiff Marc Randazza refused to signed a **Conflict of Interest Disclosure** in the WIPO Decision regarding Marc Randazza of Randazza Legal Group against Defendant Crystal Cox and Defendant Eliot Bernstein. Defendant Crystal Cox requested that the WIPO Panel Sign a Conflict of Interest Disclosure.

This request was sent to Sole Panelist Peter L. Michaelson by WIPO and yet was NOT Signed and returned to Defendant Eliot Bernstein and Defendant Crystal Cox.

Sole Panelist Peter L. Michaelson has massive conflicts of interest regarding iViewit, Proskauer Rose, MPEG LA, Judith Kaye, Patent Theft, Eliot Bernstein and more regarding Eliot Bernstein and the Journalism of Investigative Blogger Crystal Cox regarding ALL named in the iViewit SEC Complaint, RICO Complaint and Legal Action surrounding iViewit Technologies Video Technology Theft by Proskauer Rose Attorneys.

On belief and knowledge of Defendant Crystal Cox, Sole Panelist Peter L. Michaelson worked at Bell Lab with Proskauer Rose Attorney Kenneth Rubenstein whom was the main Patent Attorney involved in the theft of the 13 Trillion Dollar iViewit Technology theft. Proskauer Rose Patent attorney, who is also the MPEG LA head patent attorney, is named in RICO Complaints, Patent Lawsuits, and more regarding the iViewit Technology and Eliot Bernstein.

On belief and knowledge of Defendant Crystal Cox, **Peter L. Michaelson** knows that he has massive conflicts of interest regarding being a Sole Panelist reviewing Domain Names owned by iViewit Founder and one of the iViewit Inventors, Eliot Bernstein. Peter L. Michaelson knows that he has massive conflicts of interest regarding being a Sole Panelist reviewing Domain Names owned by Investigative Blogger Crystal L. Cox whom Peter L. Michaelson know has been reporting on the iViewit Technology theft for over 3 years. In fact, **Peter L. Michaelson was a requested Panelist** by Proskauer Rose Law Firm in WIPO Case (TG) D2011-0678, (CT) D2011-0679, (CT) D2011-0677, (CT) D2011-0675 (Complainant Proskauer Rose), regarding Domain Name Disputes with Proskauer Rose Lawyers and Investigative Blogger Crystal L. Cox. For proof of this, review the emails of that Case.

Sole WIPO Panelist Peter L. Michaelson has conflicts of interest with MPEG LA, whom is named in the Eliot Bernstein RICO Complaints, SEC Complaints and Technology Infringement. Sole WIPO Panelist Peter L. Michaelson has conflicts of interest with MPEG LA's patent attorney Kenneth Rubenstein of Proskauer Rose Law Firm whom was the original Patent Attorney for iViewit and originally stole the 13 Trillion Dollar iViewit Technology.

Peter L. Michaelson is connected with Proskauer Rose in regard to the International Commission on Patent Disputes and the CPR Protocol on Determination of Damages in Arbitration. This too is an undisclosed Conflict of Interest.

Upon Knowledge and Belief of Defendant Crystal Cox, Sole WIPO Panelist Peter L. Michaelson is connected to ex-Supreme Court Judge Judith Kaye who is also named in RICO Complaints, SEC Complaint, Patent Lawsuits and more in the iViewit Technology theft. As Judith Kaye was involved in covering up the theft. This was connected to the fact that her Husband was a Proskauer Rose Lawyer at that time, whom is now deceased.

In WIPO Decision Case No. D2012-1525, Sole Panelist Peter L. Michaelson names Proskauer Rose, and discusses my investigative writing of Proskauer Rose, Bruce Sewell Apple General Counsel who was Intel General Counsel when the iViewit Technology was stolen and Time Warner in conspiracy over the iViewit Technology. Proskauer Rose, Bruces Sewell of Apple and Time Warner had nothing to do with WIPO Case Case No. D2012-1525.

Sole Panelist Peter L. Michaelson brings up this point in order to attempt to protect those involved in the iViewit Technology theft in which Sole Panelist Peter L. Michaelson is in conspiracy and serious conflict of interest with. Why name Proskauer Rose, Bruce Sewell of Apple and Time Warner in a decision for a Domain Name regarding a Porn Industry Attorney named Marc Randazza and Domain Names owned by Investigative Blogger Crystal L. Cox and iViewit Founder / Inventor Eliot Bernstein.

Sole Panelist Peter L. Michaelson used a New York Times article as Investigative Fact to Convict Eliot Bernstein and Crystal Cox of extortion in WIPO Decision.

David Carr of the New York Times wrote an article called, "When Truth Survives Free Speech". This is an "Opinion" of a journalist for the New York Times. It is not fact and has many false accusations and information. Sole Panelist Peter L. Michaelson references this article in his defamatory, criminal WIPO Decision. An "article" in the New York Times, used as FACT in a decision for Intellectual Property Rights is not based in fact or in law. And in fact, is unlawful, illegal and WIPO is liable for his actions in this matter.

In my WIPO Complaint Response, I provided documentation to the FACT that there was no Extortion charges against me. I Provided eMail Communication between Attorney Marc Randazza and myself Defendant Crystal Cox. I even provided the WIPO Panelist with a Copy of an eMail from Marc Randazza to Defendant Crystal Cox, stating that he would represent me in my Appeal of Obsidian Finance Group V. Crystal Cox.

Sole Panelist Peter L. Michaelson deliberately ignored my proof, my documents of facts, and simply went on the stated the word of Complainant, Porn Attorney Marc Randazza.

Sole Panelist Peter L. Michaelson then went so far as to accuse me of a serious crime in a worldwide published WIPO Decision This is Illegal and WIPO is liable.

WIPO is not a Criminal Investigation Court and has no right to accuse me of a Crime in Published WIPO Decisions. In doing so, Sole Panelist Peter L. Michaelson has committed a Crime and has defamed me seriously. This has also caused me severe damage and backlash. I demand that WIPO publish a retraction of this Decision in no less than 3 major Media Outlets. And that WIPO retract this Defamatory, Criminal WIPO Decision.

Peter L. Michaelson has acted in conspiracy with Porn Attorney Marc Randazza in inciting Hate against Blogger Crystal Cox whom Marc Randazza was my attorney for a short time, and whom I Fired for acting unethically. Peter L. Michaelson has not reviewed the facts of this case, and instead Peter L. Michaelson has stated that Crystal Cox and Eliot Bernstein are guilty of Extortion.

WIPO showed extreme discrimination, prejudice and special favors to Marc Randazza throughout the process. WIPO even let Marc Randazza add several domain names to the WIPO complaint, BEFORE he even paid a filing fee. I demand that there be a special investigations of all emails from WIPO to Marc Randazza, from Peter L. Michaelson to Marc Randazza, and a thorough examination of all documentation I submitted proving my case and that there was no extortion charges against me.

In WIPO Decision Case No. D2012-1525, Peter L. Michaelson states

"Respondent's actions in registering and using the disputed domain names may appear, at a first glance, to simply be a vehicle through which she provides advertising through pay-per-click sites, but on slightly closer examination are actually components of an artifice intended to extort funds from the Complainant and thus a pretext for a rather egregious variant of cybersquatting. As such, none of those actions can or will serve as a predicate upon which the Respondent can lawfully develop any rights or legitimate interests in any of the disputed domain names."

Sole WIPO Panelist **Peter L. Michaelson flat out lies** in saying these sites are **pay per click** that I receive revenue from. I have not received revenue from disputed names. Any ads placed on said Domain Names were places by the Registrar, Godaddy, and the Revenue was taken by Godaddy and NOT Respondent.

Sole WIPO Panelist Peter L. Michaelson commits fraud and defamation in saying that Domain Names are **“actually components of an artifice intended to extort funds from the Complainant”**. WIPO Panelist Peter L. Michaelson has no proof of Complainant being asked for money to remove blog post. WIPO Panelist Peter L. Michaelson has no proof of Complainant giving money to Respondent. WIPO Panelist Peter L. Michaelson has no proof what so ever of intention to “extort”. WIPO Panelist Peter L. Michaelson simply goes on the word of Unethical Porn Industry Attorney Marc J. Randazza.

WIPO Panelist Peter L. Michaelson States:

“the Respondent’s intention, as reflected by the record, was never to solely provide, through her websites, speech critical of the Complainant. Rather, her objective in both registering and using the disputed names was apparently to engage in a rather sinister and tenacious scheme to extort money from the Complainant.”

This is a flat out false statement. The record shows that I purchased MarcRandazza.com on the same day that I had a Phone Meeting with Marc Randazza regarding representing me in my Obsidian Finance Group V. Crystal Cox, high profile Free Speech Case I was taking to the Ninth Court of Appeals. I did not post one word on that Blog until months later when I FIRED Marc Randazza and he had conspired with opposing counsel to STOP me from going to the NINTH with my Appeal. My “objective” was to EXPOSE an unethical, hypocritical, lying, crooked attorney and to WARN others whom may have Marc Randazza do them what he did to me. I did not ask for money to remove information. In fact Marc Randazza offered to buy MarcRandazza.com and email records that xxx has seen, show that I rejected this offer and said that MarcRandazza.com was not for sale at ANY price. WIPO Panelist Peter L. Michaelson even saw an email where Respondent Marc Randazza says he did not mind me asking for a job, and that was the only reference of money that EVER Came UP. WIPO Panelist Peter L. Michaelson knows all of this and still Falsley accused me of Extortion in mass, high profile media.

WIPO Panelist Peter L. Michaelson States:

“Specifically, the Respondent first posted negative and false commentary on her websites that was intentionally calculated to injure the Complainant’s on-line reputation and disrupt the Complainant’s business conducted through his law firm. Thereafter, the Respondent used those sites in a manner that apparently optimized their ranking on the Google search engine in order to increase their visibility and prominence on search results yielded through a Google search of the Complainant, thus likely exacerbating the injury caused to the Complainant.”

Again WIPO Panelist Peter L. Michaelson flat out lies. I, Respondent posted "commentary" in order to expose Marc Randazza, to discuss my experience with Marc Randazza as an attorney. From there I got lots of tips, so I posted more information. WIPO Panelist Peter L. Michaelson has no reason to believe that the "commentary" is false. As it is true to the absolute best of my knowledge and information.

WIPO Panelist Peter L. Michaelson has no right to flat out state the commentary to be false, as it was NOT false. And it certainly was not posted to then Extort Money from Marc Randazza. This makes no logical sense and has no records of proof.

And of course I "optimized" my "sites" that is the point of the internet. I am Media, and I get the stories found strong in the search, that is the point of the INTERNET. It is not some sinister extortion plot. I asked for and I received NO money from Marc Randazza. IN fact, WIPO Panelist Peter L. Michaelson has seen emails where Marc Randazza asked that I pay his expenses in representing me.

WIPO Panelist Peter L. Michaelson flat out lies in stating that I "intentionally calculated to injure Complainant". I Intentionally wrote blog posts to expose what Marc Randazza had done to me, my experience with Marc Randazza and tips and information I had investigated and received regarding Marc Randazza and the Randazza Legal Group.

WIPO Panelist Peter L. Michaelson States

"Once all this occurred, the Respondent then offered her reputational management services to the Complainant through which, for a considerable fee, she would remediate the Complainant's on-line reputation by eliminating all the negative and false commentary of her own making and presumably also ceasing her use of the disputed domain names. Basically, for a price, she would undo the injury to the Complainant for which she was responsible for having created in the first place. This egregious conduct clearly constitutes bad faith under the Policy."

WIPO Panelist Peter L. Michaelson has defamed me and acted criminally in this statement as he falsely accused me of criminal activity. WIPO Panelist Peter L. Michaelson has seen emails and records that prove that did NOT offer to "remediate" anything for a fee. I NEVER, EVER offered to eliminate any "commentary". This is a flat out false, defamatory statement with malice as WIPO Panelist Peter L. Michaelson had the emails and records proving this untrue. WIPO Panelist Peter L. Michaelson flat out lies hypothesizing in a WIPO decision that I claimed I would undo injury that I did for a fee. This is NOT True. I will NOT undo my blog posts for a price, and I never offered Such. My intention is to warn others potential clients on how dangerous and unethical that Marc Randazza and Randazza legal group is.

There was no “price” offered. So WIPO Panelist Peter L. Michaelson saying that “Basically, for a price, she would undo the injury to the Complainant for which she was responsible for having created in the first place.” this again is defamatory and I Demand WIPO issue a Retraction in major media sources.

In WIPO Decision Case No. D2012-1525, Peter L. Michaelson discusses Marc Randazza’s given name and “Mark”. Yet no Trademark Documents applied or were filed. And Marc Randazza goes by MarcoRandazza on Twitter, YouTube and his username on his own blog. There is no ™ on Marc Randazza’s Blog. And there was no proof given to WIPO of Marc Randazza’s “given name” as I believe his birth name is Marco Randazza and not Marc Randazza. Also note that this Marc Randazza is not the only Marc Randazza in the world and should not have a right to steal this intellectual property as the only rightful owner in the world.

In WIPO Decision Case No. D2012-1525, Peter L. Michaelson States:

“Third, the Respondent attempted to commercially benefit from registration of these names by offering “reputation management” services to the Complainant – through baiting the Complainant into an extortionate scheme.”

This is a flat out false claim, and is defamatory. I did not bait the Complainant, in fact Marc Randazza entered my life through channels other than me. Marc Randazza wanted to be my attorney in the biggest First Amendment Case out there at this time, and got very angry when I fired him as my Attorney and instead chose UCLA Professor Eugene Volokh.

In WIPO Decision Case No. D2012-1525, Peter L. Michaelson States:

“Specifically, once the Complainant declined her “reputation management” services, the Respondent then registered domain names that contained not only the Complainant’s surname, but also the personal names of his wife and three year old daughter, and then included falsehoods about the Complainant on her websites to which the domain names resolved.”

This is false and defamatory. I did not post falsehoods, nor did I start blogs to post falsehoods because Marc refused to pay me. I did not ask Marc Randazza to pay me to remove anything. My Blogs were to expose Marc Randazza. And there was NEVER a blog at the alleged domain of Marc Randazza’s alleged daughter. Peter L. Michaelson flat out lies.

**Plaintiff Marc Randazza has Criminally and Civilly Conspired with
Godaddy Inc., Bob Parsons, Jessica Griffin Godaddy Insider,
and other John and Jane Doe's at Godaddy.**

On belief and knowledge of Defendant Crystal Cox, Godaddy Inc. and Bob Parsons Godaddy President are liable for the Damage they have done to me, and now to the Entire Domaining, Domain After Market, Domain Auctions, and Domain Name Industry. Plaintiff Marc Randazza Criminally and Civilly Conspires with Godaddy Inc., and WIPO in order to steal Domain Names.

Godaddy Inc. and Bob Parsons Godaddy President make pay per click, ad money from ads on domain names, Plaintiff Marc Randazza tells the courts and WIPO that the "Respondent" "Defendant" makes these ad dollars which is false. Godaddy Inc. and Bob Parsons Godaddy President sells domain names, customers such as Defendant Crystal Cox and Defendant Eliot Bernstein, pay for domain names, renew domain names year after year and built content, build value into these domain names. Then Plaintiff Marc Randazza, a Domain Name Law and Intellectual Property Attorney conspire criminally and civilly with Godaddy Inc. and Bob Parsons Godaddy President, and the Las Vegas Courts to simply take domain names, intellectual property and to redirect your internet traffic without due process and based solely on the unproven information given by Attorney Plaintiff Marc Randazza.

In 2005, Defendant Crystal Cox began giving Godaddy large amounts of business. I had met Godaddy at TRAFFIC West, a Domainer Trade Show Started by Rick Schwarts, the man who SOLD Men.com for 1.4 Million many years before. I also met the man who Sold Business.com for 7.5 Million and many other attorneys and industry insiders. I Liked Godaddy and thought them to have integrity, 7 years later my then partner and I have paid Godaddy hundreds of thousands of dollars in renewal fees and domain name renewals. In 2006, I believe we had around 70,000 domain names which would give Godaddy Inc. around \$70,000 a year in domain name renewal fees. Now after 7 years of being a Godaddy Client and vast amount of Money, Referrals and Business I have given Godaddy. Godaddy has Criminally and Civilly conspired with Plaintiff Marc Randazza to lock, redirect, and flat out steal domain names with no due process to the Godaddy Client.

**Plaintiff Marc Randazza has Criminally and Civilly Conspired
with Tracy L. Coenen of SequenceInc.com**

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza conspired Criminally and Civilly with SequenceInc.com, Tracy L. Coenen, Tracy Coenen to Paint Blogger Crystal Cox in False Light.

As seen In Exhibit T, In Criminal and Civil Conspiracy with Plaintiff Marc Randazza, Tracy L. Coenen has publicly accused Defendant Crystal Cox of Extortion. In Criminal and Civil Conspiracy with Plaintiff Marc Randazza Tracy L. Coenen has defamed Defendant Crystal Cox.

In Criminal and Civil Conspiracy with Plaintiff Marc Randazza Tracy L. Coenen has Criminally and Civilly Endangered Defendant Crystal Cox and Defendant Eliot Bernstein.

On belief and knowledge of Defendant Crystal Cox, In Criminal and Civil Conspiracy with Plaintiff Marc Randazza Tracy L. Coenen has aided and abetted Plaintiff Marc Randazza to remove massive information regarding the iViewit Technology Theft. In Criminal and Civil Conspiracy with Plaintiff Marc Randazza Tracy L. Coenen has deliberately, with malice, painted Defendant Crystal Cox in false light so as to discredit Defendant Crystal Cox and the iViewit Technology story involving Liberty Media Holdings, Corbin Fisher, MPEG LA, Manwin and massive others.

Manwin, Liberty Media Holdings, Corbin Fisher, and more connected to Plaintiff are infringing on the iViewit Technology and Plaintiff is trying to Suppress the Flow of information on the Blogs of Investigative Blogger Crystal L. Cox, a Media Defendant in Randazza V. Cox and in Obsidian V. Cox.

Godaddy and other Domain Name Registrars sell Domain Names with the names of others in them every day, yet the, in conspiracy it seems, the end user fights the legal battle over owning domain names Godaddy SOLD them and Godaddy made "commercial" revenue over the sale of the domain name, and of ads on the domain names when parked at Godaddy.

Tracy L. Coenen has acted In Criminal and Civil Conspiracy with Plaintiff Marc Randazza, and AOL, AOLTW, Julie Jacobs, Tim Cook, John C. Malone and John and Jane Doe's to cover up information online regarding the involvement of AOL, AOLTW, in the iViewit Stolen Technology.

On belief and knowledge of Defendant Crystal Cox, Co-Conspirator Tracy L. Coenen know that AOL is involved in the iViewit Technology theft. Co-Conspirator Tracy L. Coenen knows that AOL has been named in RICO Complaints, SEC Complaints, USPTO Complaints and massive legal actions regarding the iViewit Technology Theft.

Upon Knowledge and Belief of Defendant Crystal Cox, Tracy L. Coenen has acted In Criminal and Civil Conspiracy with Plaintiff Marc Randazza, and AOL's Julie Jacobs, Time Warner, Liberty Holdings Media, Viacom, Ernst and Young, Arthur Anderson, Warner Bros., and other John and Jane Does in aiding and abetting massive shareholder fraud and in suppressing the iViewit Story and setting up, harassing, defaming, threatening and criminally endangering Blogger Defendant Crystal Cox who is exposing the iViewit Store LOUDLY in her online news media network, Anti-Corruption Media, Whistleblower Media, Investigative Blogs by Investigative Blogger Crystal L. Cox.

Plaintiff Marc Randazza has Criminally and Civilly Conspired with Ronald Green, Laura Tucker, Randazza Legal Group, "GERMANY GMBH", Manwin GERMANY GMBH, Manwin and Liberty Media in suppression of blogs regarding the iViewit Technology Case.

On belief and knowledge of Defendant Crystal Cox, Ronald Green, Marc Randazza, Jennifer Randazza, and Randazza Legal Group are connected to **"GERMANY GMBH"** - Which is **Manwin GERMANY GMBH**, which is connected to Porn Wiki Leaks and Porn Industry illegal activity, financial schemes, human trafficking, harassment and intimidation rings, staged suicides, attempted murders, copyright schemes, stalker rings, porn industry hookers, and have known mafia and other organized crime connections.

On belief and knowledge of Defendant Crystal Cox, Manwin GERMANY GMBH is a named Defendant in the iViewit SEC Complaint, iViewit RICO Complaint, and this is the main reason for Plaintiff Marc Randazza to attempt to silence Defendant Investigative Blogger Crystal L. Cox and iViewit Technology Founder and Inventor Eliot Bernstein.

On belief and knowledge of Defendant Crystal Cox, Randazza Legal Group is out to protect Manwin GERMANY GMBH, as Manwin GERMANY GMBH owes iViewit Technologies Billions for over 11 years of knowingly infringing on the iViewit Video Technology.

**Plaintiff Marc Randazza has Criminally and Civilly Conspired
with Tonkon Torp Law Firm, David S. Aman, Steven Wilker,
Mike Morgan, Obsidian Finance Group, Kevin D. Padrick,
Patricia Whittington, David W. Brown and Judge Marco Hernandez.**

Plaintiff Marc J. Randazza is, and has been for over a year, acting in Civil and Criminal Conspiracy with Tonkon Torp Law Firm. Tonkon Torp Law Firm represented Enron in Bankruptcy Proceedings and Related Matter. Enron Collapsed, went bankrupt, due to Proskauer Rose Patent Lawyers and Enron's involvement in the Stealing of the iViewit Technology, of which Defendant Eliot Bernstein is the Founder and is one of the iViewit Video Technology Inventors.

On belief and knowledge of Defendant Crystal Cox, Tonkon Torp Law Firm is counsel to Intel Corp. Portland who is named in iViewit SEC Complaints, RICO Complaints, USPTO Complaints and legal action regarding the stealing of the iViewit Technology. Tonkon Torp law firm has motive to suppress the iViewit Story in connection with protecting their clients.

Defendant Eliot Bernstein, is also a named defendant on the Court Docket for Obsidian Finance Group Vs. Crystal Cox, Case Number CV-11-57-HZ U.S. District Court, District of Oregon, and Case 2:12-mc-00017-JPH Eastern District of Washington regarding Obsidian V. Cox. Eliot Bernstein is the Founder of iViewit Technologies and one of the Inventors of the iViewit Technology, which Plaintiff Marc Randazza and Tonkon Torp Law Firm are Criminally and Civilly Conspiring to Silence Information on.

Enron is named in iViewit, Eliot Bernstein, SEC Complaints, RICO Complaints, Criminal Complaints, and ALL of the Blogs of Defendant Investigative Blogger Crystal L. Cox report on the iViewit Technology Story and the involvement of Enron, Proskauer Rose Law Firm, MPEG LA, Arthur Anderson, Kenneth Rubenstein Patent Attorneys, Hon. Judith Kaye and thousands of others involved in the iViewit Technology Theft.

Tonkon Torp Law Firm, Mike Morgan and other John and Jane Doe's represented Enron and have civilly and criminally conspired with Plaintiff Marc Randazza to cover up Tonkon Torp's involvement in the Stealing of the iViewit Technology.

Plaintiff Marc J. Randazza is acting in Civil and Criminal Conspiracy with Tonkon Torp Law Firm regarding the suppressing of Investigative Blogger Crystal L. Cox exposing the documents, evidence, records of the iViewit Technology Theft as Seen at www.DeniedPatent.com, www.iViewit.tv, www.EthicsComplaints.com, www.BankruptcyCorruption.com, and all blogs listed in the attached Motion Entitled, **"Motion Requesting Preservation of Evidence"**, of which these blogs in their entirety are evidence in this court case and must be printed out by this court in their entirety, as requested by Defendant Crystal Cox and in the best interest of shareholders and the public at large.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc J. Randazza is acting in Civil and Criminal Conspiracy with Tonkon Torp Law Firm and connections to CPA Firm Arthur Anderson, which is a named defendant in the iViewit Case. CPA Firm Arthur Anderson's CPA Gary Stachlowski was the primary paid witness in the Obsidian V. Cox Case.

Plaintiff Marc Randazza and Tonkon Torp Law Firm are and have been Criminally and Civilly Conspiring to intimidate, harass, defame Defendant Crystal Cox in order to attempt to stop Defendant Crystal Cox from Appealing the Obsidian V. Cox Case. First, Plaintiff Marc Randazza and Tonkon Torp Law Firm, Attorney David Aman Criminally and Civilly Conspired regarding Receivership in the Obsidian V. Cox Case as Plaintiff Marc Randazza recommend a Las Vegas Attorney named Lara Pearson of the Rimon Law Group to be the Receiver in Obsidian V. Cox. Plaintiff Randazza did this in order to steal Domain Names such as MarcRandazza.com. Plaintiff Randazza had been out to sabotage Defendant Crystal Cox's Appeal from day one in order to suppress the iViewit Story, and protect his Porn Clients.

Plaintiff Marc Randazza and Tonkon Torp Law Firm, Attorney David Aman desperately want to STOP the Obsidian V. Cox Appeal, both have the agenda of removing Blogs in which expose the biggest Criminal Technology Case in the World, iViewit Technology. Of which both Plaintiff Marc Randazza and Tonkon Torp Law Firm, Attorney David Aman have motive to suppress. Plaintiff Marc Randazza represents Big Porn Industry Companies such as Manwin, Corbin Fisher and Others. Plaintiff Marc Randazza's clients knowingly use the iViewit Video Technology and have for over a decade. Plaintiff Marc Randazza's Clients owe Eliot Bernstein and the iViewit Inventors Hundreds of Millions of Dollars.

Plaintiff Marc Randazza and Tonkon Torp Law Firm, Attorney David Aman met with Judge Marco Hernandez and Criminally and Civilly Conspired in order to make me look like a Criminal Guilty of Extortion, when there was no proof of extortion, nor was Defendant Crystal Cox on Trial for Extortion. This Civil and Criminal Conspiracy led Judge Marco Hernandez to deny me a new trial, and to accuse me of extortion, a crime in a motion to deny a New Trial in a Civil Case.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza and Tonkon Torp Law Firm, Attorney David Aman Criminally and Civilly Conspired as recent as December 2012, as Plaintiff Marc J. Randazza, an expert in Florida Law, recently advised Tonkon Torp Lawyer David Aman how to filed documents in order to Seize my Assets, this Asset being My Right to Appeal Obsidian V. Cox. Plaintiff Marc Randazza and Tonkon Torp Law Firm, Attorney David Aman Criminally and Civilly Conspired for nearly a year now to STOP Defendant Crystal Cox's appeal.

If Defendant Cox wins the Obsidian V. Cox Appeal then iViewit Technology gets a bigger standing in "Media" and Plaintiff Marc Randazza and Co-Conspirator David Aman were sent in to sabotage the appeal to make sure this did not happen. All to cover up massive Criminal and Civil Conspiracy regarding the stealing of a 13 Trillion Dollar Video Technology of which Plaintiff Marc Randazza's Biggest Clients infringe upon every minute of every day.

**Plaintiff Marc Randazza has Criminally and Civilly Conspired
with Judge Gloria M. Navarro**

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza is acting in Criminal and Civil Conspiracy with Judge Gloria M. Navarro and other co-conspirators to suppress information regarding the Stolen iViewit Technology.

Plaintiff Marc Randazza is acting in Criminal and Civil Conspiracy with Tonkon Torp Lawyer David S. Aman and Judge Marco Hernandez in torturously interfering with the outcome of my Case Obsidian V. Cox, of which Plaintiff Marc Randazza set out to sabotage the minute he heard of my verdict.

Plaintiff Marc Randazza is acting in Criminal and Civil Conspiracy with Tonkon Torp Lawyer David S. Aman in counselling Aman on who to get to take Defendant Crystal Cox's domain names in receivership. Plaintiff Marc Randazza told Attorney David S. Aman to use Las Vegas Attorney Lara Pearson of the Rimon Law Group who was the court-appointed receiver in the Righthaven Case.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza acted in Criminal and Civil Conspiracy with Tonkon Torp Lawyer David S. Aman, Attorney Lara Pearson, and Rimon Law Group to take domain names, suppress free speech, remove my blogs, and remove information regarding the iViewit Technology Story. Plaintiff Marc Randazza acted in Criminal and Civil Conspiracy with Judge Gloria M. Navarro who made the ruling regarding Righthaven, Receiver Lara Pearson and the liquidation of Righthaven assets to pay Attorney Marc Randazza, as seen in Exhibit P.

Plaintiff Marc Randazza has Criminally and Civilly Conspired with Sean Tomkins, J. Malcom Devoy, Randazza Legal Group, Corbin Fisher, Michael Fattorosi, and John and Jane Doe's to harass Industry Whistleblowers Monica Foster aKa Alex Melody and Desi Foxx aKa Diana Grandmason, named in Plaintiff Marc Randazza's complaint against his ex-client, Investigative Blogger, Whistleblower, Defendant Crystal Cox.

Monica Foster aKa Alex Melody and Desi Foxx aKa Diana Grandmason have written on the iViewit Technology. Monica Foster aKa Alex Melody has interview Defendant Crystal Cox and iViewit Inventor and Founder Defendant Eliot Bernstein. Plaintiff Marc Randazza has Criminally and Civilly Conspired to SILENCE Monica Foster aKa Alex Melody in whatever way necessary.

Plaintiff Marc Randazza has Criminally and Civilly Conspired with Stephen Media, Todd Kinnicann, Kenneth P. White, Jordan Rushie, Brown White and Newhouse, PopeHate.com, AboveTheLaw.com, Forbes, and and John and Jane Doe's in order to create a media falsehood to win cases, affect settlement, control clients, trick clients, and to shut down the blogs of Investigative Blogger Crystal L. Cox exposing the Iewit Technology Story and Blowing the Whistleblower on Plaintiff Marc Randazza and his co-conspirators.

Plaintiff Marc Randazza has Criminally and Civilly Conspired with Stephen Media, Todd Kinnicann, Hustler, Evil Angel, Zero Tolerance, Red Light District, Liberty Media Holdings, Corbin Fisher, Playboy, John Malone, Sean Tompkins, J. Malcom Devoy, Jordan Rushie, Kenneth P. White, Viacom, Manwin, Porn Wiki Leaks, Forbes, Kashmir Hill, Siouxielaw.com, Jason Jones Salty Droid, Eric Turkewitz, Scott H. Greenfield, Carlos Miller, Tracy L. Coenen, Mulvihill and Rushie LLC, Jeremy Steele, and John and Jane Doe's in order to shut down competing websites and blogs. And to harass, intimidate, defame, threaten, criminally endanger those who blow the whistle on them, expose them and stand up to them.

On belief and knowledge of Defendant Crystal Cox, **Plaintiff Marc Randazza has Criminally and Civilly Conspired with** MPEG LA, Liberty Media Holdings, Corbin Fisher, Godaddy Inc., Peter L. Michaelson, Kenneth Rubenstein, Proskauer Rose Law Firm in suppressing / removing the iVewit Technology story in connection to Plaintiff Marc Randazza and his clients Corbin Fisher, Liberty Media, John C. Malone, ATT, Time Warner Inc. using the iViewit Technology and owing iViewit Technology and Defendant Eliot Bernstein Billions of Dollars.

Upon Knowledge and Belief of Defendant Crystal Cox, Plaintiff Marc Randazza has Criminally and Civilly Conspired with David S. Aman of Tonkon Torp Law Firm and David Carr of the New York Times.

On belief and knowledge of Defendant Crystal Cox, David Carr of the New York Times wrote an article defaming Defendant Crystal Cox, painting me in false light, accusing me of extortion falsely and in this article, in criminal and civil conspiracy with Proskauer Rose, Plaintiff Marc Randazza, Warner Bros. Jeffrey Bewkes and other John and Jane Does, David Carr mentions the Investigative Blogs of Defendant Crystal Cox in regard to the iViewit Technology Story and Defendant Eliot Bernstein. David Carr of the New York Times deliberately defamed Defendant Crystal Cox in Order to Suppress the iViewit Story for and with Co-Conspirators. Plaintiff Marc Randazza has Criminally and Civilly Conspired with David Carr, and continues to promote the defamatory article painting Defendant Crystal Cox in false light, criminally endangering Defendant Crystal Cox, and defaming Defendant Crystal Cox.

On belief and knowledge of Defendant Crystal Cox, **Plaintiff Marc Randazza has Criminally and Civilly Conspired with Judge Marco Hernandez and David S. Aman of Tonkon Torp Law Firm in order to manipulate the courts, commit fraud on the courts and convince Judge Marco Hernandez that Defendant Crystal Cox had extorted them both, when there was NO Extortion.**

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza negotiated with Opposing Counsel David S. Aman of Tonkon Torp Law Firm and Kevin Padrick Plaintiff in Obsidian V. Cox, on behalf of his client, Defendant Crystal Cox. This terms of this negotiation was never disclosed to Plaintiff Marc Randazza's Client Defendant Crystal Cox and due to this violation of my rights as a client, I, Defendant Crystal Cox Fired Marc Randazza.

After this, he found another way to criminally and civilly conspire with Proskauer Rose and other Co-Conspirators to shut down my blogs regarding the iViewit Technology story and to Sabotage my Ninth Circuit Appeal in criminal and civil conspiracy.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza has Criminally and Civilly Conspired with Judge Marco Hernandez and David S. Aman of Tonkon Torp Law Firm in accusing me of extortion in a motion to deny a new trial, in which Plaintiff Marc Randazza had phone meeting and correspondence with Judge Marco Hernandez and Tonkon Torp Lawyer David Aman in Regard to.

This conspiracy defamed, attacked, threatened, and painted blogger Defendant Crystal Cox in False Light. However, Defendant Crystal Cox refused the Settlement Offer offered to her, me just after this. So Plaintiff Marc Randazza conspired with others in a massive online hate and defamation campaign to affect my case and intimidate me into stopping my appeal. This did not work either, as Defendant Crystal Cox is dedicated to exposing all those involved in the iViewit Technology theft and to giving voice to victims of a corrupt judicial system, so then, Plaintiff Marc Randazza Criminally and Civilly Conspired with David S. Aman of Tonkon Torp Law Firm to appoint Receiver Lara Pearson to steal my Domain Names. When this did not work, Plaintiff Marc Randazza Criminally and Civilly Conspired with David S. Aman of Tonkon Torp Law Firm to Steal, Seize my "Right to Appeal" as an Asset.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza has Criminally and Civilly Conspired with David S. Aman of Tonkon Torp Law Firm, Mike Morgan of Tonkon Torp Law Firm and Steven Wilker of Tonkon Torp Law Firm in filing a judgment lien, general lien and execution of Sheriff's Sale on Plaintiff's Asset, the Asset being Plaintiff Crystal Cox's Right to Appeal.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza has Criminally and Civilly Conspired with Journalist Kashmir Hill, Forbes Inc., Steve Forbes, AboveTheLaw.com in order to paint Defendant Crystal Cox in False Light, Defame Defendant Crystal Cox, Harass Defendant Crystal Cox and with actual malice, accuse Defendant Crystal Cox of Criminal Activities of Defendant Crystal Cox was not under investigation for, on trial for nor convicted of.

Plaintiff Marc Randazza is an attorney for AboveTheLaw.com in which Kashmir Hill writes for, and where Kashmir Hill use to work. Plaintiff Marc Randazza has Criminally and Civilly Conspired with in defaming Defendant Crystal Cox and accusing her, me of the crime of Extortion of which I am not guilty of nor have I been under investigation for.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza has Criminally and Civilly Conspired with Kashmir Hill to protect those involved in stealing the iViewit Technology. Plaintiff Marc Randazza has Criminally and Civilly Conspired with Kashmir Hill in suppressing the Free Speech of Blogger Defendant Crystal Cox, painting Blogger Defendant Crystal Cox in false light, and harassing Blogger Defendant Crystal Cox.

On belief and knowledge of Defendant Crystal Cox, **Plaintiff Marc Randazza has Criminally and Civilly Conspired** with Proskauer Rose Law Firm, Proskauer Rose Patent Department, Hon. Judith Kaye, Peter L. Michaelson, Kenneth Rubenstein, Christopher Wheeler, Matthew Triggs, Allen Fagin, Jenifer DeWolf Paine, Joseph Leccese, Gregg Mashberg and John and Jane Doe's.

Peter L. Michaelson and Kenneth Rubenstein worked together at Bell Labs, are connected to MPEG LA and to Hon. Judith Kaye as well as other Jane and John Doe's in Criminal and Civil Conspiracy. Peter L. Michaelson is close with Plaintiff Marc Randazza as seen together at every INTA Meeting. Peter L. Michaelson is connected to MPEG LA who is involved in the stealing of the iViewit Technology. Peter L. Michaelson is connected to Proskauer Rose Attorney Kenneth Rubenstein, as seen in the FORE Systems Inc. Lawsuit Depositions.

Plaintiff Marc Randazza has Criminally and Civilly Conspired with Xbiz, Liberty Media Holdings, Corbin Fisher, Brazzers, Bittorent, Media Products Inc., Peter L. Michaelson, WIPO, Godaddy, and John and Jane Does.

Plaintiff Marc Randazza's clients Xbiz, Liberty Media Holdings, Corbin Fisher, Brazzers, Bittorent, Media Products Inc. need the iViewit Story suppressed. Plaintiff Marc Randazza has Criminally and Civilly Conspired with Peter L. Michaelson, WIPO, Godaddy, and John and Jane Does to make this happen.

Plaintiff Marc Randazza has Criminally and Civilly Conspired with Todd Kinnican, in shaking down clients, using a ring of attorney bloggers to manipulate the court and clients in order to attorneys on all sides to be paid, in violation of the rights of their own clients.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza in Criminal and Civil Conspiracy with Proskauer Rose Law Firm, Kenneth Rubenstein, Peter L. Michaelson, Warner Bros., Corbin Fisher, Manwin, Liberty Media, 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, in fraud on the courts, intimidating a reporter, investigative blogger Counter Plaintiff Crystal Cox in to removing blogs reporting on the iViewit Technology, stealing intellectual property of Counter Plaintiff Crystal Cox and thereby removing information regarding the iViewit Technology case and the involved, named defendants that are Co-Conspirators in this case, and instilling fear, undo stress, and duress on Counter Plaintiff Crystal Cox to take away her constitutional rights, free speech rights, right to due process and remove content and entire blogs of Counter Plaintiff Crystal Cox in order to inhibit the flow of information and in violation of Anti-Trust Laws and Freedom of Speech Laws.

Plaintiff Marc Randazza acted in Criminal and Civil Conspiracy with Tonkon Torp Lawyer David S. Aman who was Opposing Counsel against Pro Se Defendant Crystal Cox in Obsidian Finance Group LLC vs. Crystal Cox, in regard to Plaintiff Marc Randazza advising Tonkon Torp Lawyer David S. Aman in seizing assets of Pro Se Defendant Crystal Cox. Plaintiff Marc Randazza had acted as my attorney negotiating with David S. Aman prior to this. Plaintiff Marc Randazza acted in criminal and civil conspiracy in advising Tonkon Torp Lawyer David S. Aman to use Attorney Lara Pearson of Rimon Law Group to act as "forced" receiver over my past owned domain names. "Receiver" Attorney Lara Pearson of Rimon Law Group had acted in conspiracy with Plaintiff Marc Randazza and Judge Gloria M. Navarro in past proceedings such as, and not limited to, the Righthaven Cases.

On belief and knowledge of Defendant Crystal Cox, **Plaintiff Marc Randazza acted in Criminal and Civil Conspiracy with Tonkon Torp Lawyer David S. Aman, Opposing Counsel** against Pro Se Defendant Crystal Cox in Obsidian Finance Group LLC vs. Crystal Cox, in regard to Plaintiff Marc Randazza advising Tonkon Torp Lawyer David S. Aman in seizing assets of Pro Se Defendant Crystal Cox. When the Lara Pearson Criminal and Civil Conspiracy did not work,

Plaintiff Marc Randazza advised Tonkon Torp Lawyer David S. Aman to seize another asset of Defendant Crystal Cox. This asset is the Constitutional Rights of Defendant Crystal Cox. Plaintiff Marc Randazza acted in Criminal and Civil Conspiracy with Lawyer David S. Aman and Lawyer Steven Wilker of Tonkon Torp Law Firm to file a Lien, a Writ of Execution, a Sheriff's sale on **Defendant Crystal Cox's "Right To APPEAL"**.

This, after Plaintiff Marc Randazza conspired criminally and civilly for over a year to intimidate, threaten, harass Defendant Crystal Cox into backing out, giving up, stopping her Appeal to the Ninth Circuit Court of Obsidian Finance Group v. Crystal Cox.

Plaintiff Marc Randazza gave Lawyer David S. Aman and Lawyer Steven Wilker of Tonkon Torp Law Firm undisclosed legal advice, information, court cases, documents and more to aid and abet, civilly and criminally conspire with Lawyer David S. Aman and Lawyer Steven Wilker of Tonkon Torp Law Firm to seize **Defendant Crystal Cox's Asset, "The Right to Appeal"**. This constitutional rights violation is a well known Florida scheme to STOP a case from going to a higher court.

Plaintiff Marc Randazza has criminally and civilly conspired with many, to sabotage, alter, STOP the Obsidian Finance Group LLC Appeal to the Ninth Circuit, by Defendant Crystal Cox, for over a year now.

Judge Gloria M. Navarro is acting in criminal and civil conspiracy with Plaintiff Marc Randazza to remove mass information from the Internet Search Engines regarding the iViewit Technology story. Judge Gloria M. Navarro is acting in criminal and civil conspiracy with Godaddy, Liberty Media Holdings Inc., 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, **SiouxsieLaw.com, SequenceInc.com Tracy Coenen, and** and other John and Jane Doe's in an Online Hate, Defaming, Criminal Endangerment, Information Suppressing, Whistleblower Retaliation Harassment Campaign.

Judge Gloria M. Navarro is acting in criminal and civil conspiracy with Plaintiff Marc Randazza to protect Viacom, Time Warner Inc., Encore, Stars, ATT, APPLE, Liberty Media Holdings, Corbin Fisher, Manwin, MPEG LA, **TCI Ventures Group LLC, ATT, Liberty Digital Inc., TCI Satellite Entertainment Inc, Discovery Channel, News Corporation, Netflix, QVC, MediaOne Group, CBS, The Weinstein Company, Liberty Capital, Corbin Fisher,** Liberty Global, Belgium's Telenet Group Holding, Sirius Radio, Barnes and Noble, Discover Communications, Malone Family Foundation, and other John and Jane Doe's to suppress, remove information from the Internet, Public View regarding the stolen 13 Trillion Dollar iViewit Technology, Defendant Eliot Bernstein is the Founder of iViewit Technology and is one of the inventors of iViewit Technology.

Upon Knowledge and Belief of Defendant Crystal Cox, Judge Gloria M. Navarro is acting in criminal and civil conspiracy with Plaintiff Marc Randazza, Randazza Legal Group, Ron Green, Laura Tucker and Godaddy to steal intellectual property of Defendant Crystal Cox and Eliot Bernstein with no due process.

Upon Knowledge and Belief of Defendant Crystal Cox, Judge Gloria M. Navarro is acting in criminal and civil conspiracy with Plaintiff Marc Randazza, Randazza Legal Group, Ron Green, Laura Tucker to remove thousands of blog posts forever from the Internet Search Engines Regarding Whistleblower about Plaintiff Marc Randazza and Randazza Legal Group and the iViewit Technology Story.

Upon Knowledge and Belief of Defendant Crystal Cox, Judge Gloria M. Navarro is acting in criminal and civil conspiracy with Plaintiff Marc Randazza to permanently alter the search engines and protect, aid and abet those involved in the iViewit Technology theft and Technology Infringement.

On belief and knowledge of Defendant Crystal Cox, Judge Gloria M. Navarro is acting in criminal and civil conspiracy with Plaintiff Marc Randazza and with Rimon Law Group's Lara Pearson who Plaintiff Marc Randazza had used in Receivership issues regarding Righthaven, in which Judge Gloria M. Navarro ruled on and enforce.

On belief and knowledge of Defendant Crystal Cox, **Plaintiff Marc Randazza has Criminally and Civilly conspired with** Godaddy Inc. and Bob Parsons Godaddy President, WIPO Executive, John Malone of Liberty Media, MPEG LA, Doug Chey, SONY, ATT, Kenneth P. White, APPLE, Peter L. Michaelson WIPO Panelist, Bruce Sewell, Steve Dowling, Warner Bros. Jeffrey Bewkes, Time Warner Inc., AOL, Viacom, Tonkon Torp Law Firm, Mike Morgan Head of Tonkon Torp, Steven Wilker Tonkon Torp, David S. Aman Tonkon Torp, Kevin D. Padrick Obsidian Finance Group, J. Malcolm Devoy, Sean Tomkins, Kenneth P. White, Philly Law Blog, Jordan Rushie, SaltyDroid, White Newhouse and Brown, Peter L. Michaelson INTA, Proskauer Rose Attorney Kenneth Rubenstein, Proskauer Rose Law Firm, Gregg Mashberg, Mathew Triggs, Christopher Wheeler, Forbes, New York Times, Jeff Manning, Oregonian, Scott Donahey, Tom Halket, Manwin, Corbin Fisher, Encore, Startz, TCI Ventures Group LLC, ATT, Liberty Digital Inc., TCI Satellite Entertainment Inc, Discovery Channel, News Corporation, Netflix, QVC, MediaOne Group, CBS, The Weinstein Company, Liberty Capital, Corbin Fisher, Liberty Global, Belgium's Telenet Group Holding, Sirius Radio, Barnes and Noble, Discover Communications, Malone Family Foundation, Cato Institute, 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, Siouxslaw.com, SequenceInc.com Tracy Coenen, Mark Bennett blog.bennettandbennett.com, Bennett and Bennett, Scott H. Greenfield, Carlos Miller, Eric Turkewitz - Turkewitz Law Firm and NewYorkPersonalInjuryAttorneyBlog.com, Scott H. Greenfield of Simple Justice - a New York Criminal Defense Blog and blog.simplejustice.us, Carlos Miller of PixIQ.com and PhotographyisNotaCrime.com, Ronald Green, Laura Tucker,

Manwin GERMANY GMBH, Enron, Hon. Judith Kaye, Bell Labs, Attorney Lara Pearson, Judge Gloria M. Navarro, Rimon Law Group, Manwin, Porn Wiki Leaks, Arthur Anderson, Ernst and Young, KPMG, **Counter-Defendant** Roxanne Grinage, **Counter-Defendant** HireLyrics, **Counter-Defendant** Steve Dowling, Bruce Sewell, Phil Schiller, Peter Oppenheimer, Tim Cook, Paul Otellini, Jeffrey Bewkes, Time Warner Inc., Matthew Triggs, Foley and Lardner Law Firm, **Counter-Defendant** Gregg Mashberg, Allen Fagin, Kenneth P. White, Blockbuster, H. Wayne Huizenga, Judge Judith Kaye, Christopher Wheeler, William Dick, Intel Corp., Jeremy Steel, Brian G. Utley, Arthur Anderson, Greenberg Traurig, Todd Outten, **Counter-Defendant** Doug Chey, **Counter-Defendant** 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 Productts 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, **Counter-Defendant** Todd Kinnican, **Counter-Defendant** Jordan Rushie Philly Law Blog, Bob Garfield NPR, Kashmir Hill Forbes, David Carr New York Times, **Counter-Defendant** Kenneth P. White Popehate.com, **Counter-Defendant** SiouxsieLaw.com, SequenceInc.com Tracy Coenen, Kevin D. Padrick, David W. Brown, Mike Morgan Tonkon Torp Law Firm, **Counter-Defendant** David S. Aman, Steven Wilker,

AND

Jessica Griffin at Godaddy, Mike Stack (Redgoat aka Goatsred), Weinergate, 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, APPLE, Bruce Sewell, Phil Schiller, Philip W. Schiller, Peter Oppenheimer, 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, Digital Playground, Brazzers, 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, Blockbuster, Jessica Griffin at Godaddy, Michael Fattorosi, Slashdot, Hunter Moore, Shelley Lubben's Stalker, Mike Stack (Redgoat aka Goatsred), Weinergate, Todd Kinnican, Mulvihill and Rushie LLC and other John and Jane Doe's to Be Added, in intimidating whistleblowers, suppressing the iViewit Stolen Technology investigative reports, defaming whistleblowers, threatening whistleblowers and investigative bloggers, stealing domain names, stealing intellectual property, harassing whistleblowers and investigative bloggers, and removing content of blogs of whistleblowers and investigative

bloggers, and attempting to set precedence for other co-conspirators to take future domain names and blogs of industry insiders, whistleblowers and investigative bloggers.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza has Criminally and Civilly conspired with Jordan Rushie of Mulvihill and Rushie LLC Philly Law Blog, Brown White & Newhouse, Kenneth P. White, Popehat.com, Eric Turkewitz - Turkewitz Law Firm and NewYorkPersonalInjuryAttorneyBlog.com, Scott H. Greenfield of Simple Justice - a New York Criminal Defense Blog, Mark Bennett blog.bennettandbennett.com, Bennett and Bennett, Counter-Defendant Scott H. Greenfield,

and other John and Jane Doe Attorneys and Law Firms, in an online campaign to defame, discredit, threaten, intimidate and harass bloggers who speak out with an opinion or information regarding their cases they are working on or their clients. This ring of attorney bloggers have the goal of using each others blogs to affect court cases, control clients, pressure settlements, and get their paycheck as quick and as high as possible. This works in connection with local corrupt judges, and is a direct attack on the civil, constitution rights of the attorneys clients and all those involved in the cases.

This ring of attorney bloggers send in stalkers, post the make and model of whistleblower's vehicles, paint whistleblowers in false light, defame whistleblower, intimidate whistleblower, and all with the whistleblower retaliation goal of shutting them up.

These attorney bloggers, lynch mob against whistleblowers commit fraud on the courts as they use the courts as their forum, and make it look like they are a credible "media organization" or "law commentary" site, this way a Judge will have a way to corruptly rule to steal intellectual property, delete blogs, remove content, transfer domain names, changes servers and aid and abet the suppression of the information the whistleblower is bringing to the service.

Upon Knowledge and Belief of Defendant Crystal Cox, Plaintiff Marc Randazza has Criminally and Civilly conspired with Godaddy, WIPO, Peter L. Michaelson, the Nevada Courts, Jessica Griffin, and other John and Jane Does, to steal domain names and remove content of whistleblowers.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza has Criminally and Civilly conspired to shut down online media, blogs, forums, video sites, and all those competing in the search engines with him or his co-conspirator clients. These Co-Conspirators as noted above, and re-alleged from this entire complaint answer, will do anything it takes to silence whistleblowers, porn industry insiders, ex-porn stars, porn star advocates, and those who disagree with them at all.

Plaintiff Marc Randazza has Criminally and Civilly with These Co-Conspirators as noted above, and re-alleged from this entire complaint answer, to stalk, harass, threaten, intimidate, drive to suicide, murder, pressure, ruin careers of, defame these whistleblowers, porn industry insiders, ex-porn star, porn star advocates, and those who disagree with them at all.

The Porn Industry is well known to flex it's legal and financial power to get what it wants. The Porn Industry is well known to have deep mafia ties. The Too Much Media Case out of New Jersey, was a case like Defendant Crystal Cox's case whereby a judge ruled that the whistleblower was not protected by special privilege media laws. This woman is Shellee Hale and she exposed information regarding Porn Company Too Much Media and is writing a book called "Pornafia".

The Biggest Threat to the Porn Industry at this moment financially, as well as Liberty Media Holding, **Counter-Defendant** John C. Malone and all related tech, media, and video companies is the undisclosed liability of the money they owe the iViewit Technology company for every minute of video streaming for over a decade. The iViewit Technology is worth around 13 Trillion Right Now, and if iViewit called for a cease and desist of all technology use, 99 percent of ALL videos online and on television would cease to be.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza has Criminally and Civilly conspired will all listed known co-conspirators in this complaint answer, to intimidate Investigative Bloggers Defendant Crystal Cox and PornNewsToday.com's Monica Foster / Alex Melody and Foxx Media Group's Diana Grandmason aKa Desi Foxx, into silencing their reporting on the iViewit Technology storing, and Defendant Eliot Bernstein.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza and his co-conspirators are desperate to silence the iViewit Story in connection to them. This Slapp Lawsuit is a prime example of how Plaintiff Marc Randazza commits fraud on the courts, uses a ring of attorney bloggers and big media connections such as Kashmir Hill of Forbes and Bob Garfield of NPR in order to Protect Mafia Backed Porn Industry Giants.

This Slapp Lawsuit brought against Defendant Crystal Cox by Plaintiff Marc Randazza is solely to intimidate my silence and to flat out delete my blogs, and internet content exposing This Slapp Lawsuit and the iViewit Technology company. This Slapp Lawsuit is fraud on the courts by Plaintiff Marc Randazza.

Plaintiff Marc Randazza claims, in this Complaint that he has no issue with Defendant Crystal Cox Posting whatever she wants about him on her blogs that don't have "Randazza" in the web address. Yet this court unconstitutionally, unlawfully, silences my voice on my thousand blogs, regarding Plaintiff Marc Randazza. This has caused Defendant Crystal Cox damage.

I, Defendant Crystal Cox Object to Plaintiff Marc Randazza Suppressing my Free Speech, attempting to STOP my Ninth Circuit Appeal, Criminally Endangering me, Harassing Me, Painting me in False Light, Defamation Me, intimidating me, violating my civil and constitutional rights and stealing my intellectual property.

Defendant Crystal Cox will remain dedicated to exposing Plaintiff Marc Randazza. Defendant Crystal Cox will file bar complaints, criminal complaints, RICO Complaint and interview with anyone who will listen regarding the criminal endangerment, of Plaintiff Marc Randazza. In order to protect the Public at Large, the families of those inside the Porn Industry who Plaintiff Marc Randazza and his co-conspirators target, the individuals attacked in copyright trolling lynchings from several attorneys working with Plaintiff Marc Randazza and Liberty Media Holdings LLC, John C. Malone and other Co-Conspirators listed here within, as well as John and Jane Doe Civil and Criminal Conspirators.

Plaintiff Marc Randazza is guilty of Fraud and Collusion, Rackeetering, Defamation, Harassment, Stalking, Intimidation, Fraud on the Courts, Attorney Client Privilege Violation, Abuse of the Courts to Intimidate a Ninth Circuit Appeal Defend affect Big Media, and Criminal Endangerment.

Defendant Crystal Cox request this court investigate Marc Randazza as per Defendant Crystal Cox Motion filed with this court entitled, "Motion Demanding Investigation".

Defendant Crystal Cox request that Judge Gloria M. Navarro be recused, removed from this case as requested in Defendant Crystal Cox Motion filed with this court entitled, "Motion Requesting the Reclusal, Removal of Judge Gloria M. Navarro".

Defendant Crystal Cox is NOT in Violation of (Violation of Individual Cyberpiracy Protections – 15 U.S.C. § 8131).

Defendant Crystal Cox and Defendant Eliot Bernstein to my my knowledge has not purchased nor used domains in this complaint to profit.

Defendant Crystal Cox is NOT in Violation of (Cybersquatting – 15 U.S.C. § 1125(d)

Defendant Crystal Cox is NOT in Violation of (Right of Publicity - NRS 597.810)

Plaintiff Marc Randazza has no Common Law Right of Publicity

Defendant Crystal Cox is NOT in Violation of (Common Law Intrusion Upon Seclusion)

Plaintiff Marc Randazza States he has no issue with Defendant Crystal Cox exercising Free Speech on blogs such as CrystalCox.com and other blogs owned or ran by Defendant Crystal Cox as long as it is not on a blog, domain name with "Randazza" in the name. Yet this court issues an illegal TRO, preventing Defendant Crystal Cox in exercising Free Speech on blogs such as CrystalCox.com and other blogs owned or ran by Defendant Crystal Cox.

Marc Randazza threatened that he would ruin me, Plaintiff Crystal Cox if I made an enemy of him. Marc Randazza's friends have threatened my knee caps, publicly humiliated and defamed me. Marc Randazza accused me of a crime in big media in which I was never charged with through proper legal channels. Marc Randazza has exposed women in the Porn Industry who have given me tips and gave their home address and car identification information in public forums.

Marc Randazza has himself co-hearsed me to STOP my appeal to the Ninth Circuit in Obsidian V. Cox and Marc Randazza has had his friends, attorney bloggers, and big media intimidate me in order to pressure me to stop my appeal process. Marc Randazza told me in our first consult where he was to be my attorney, that those in the tip of the Porn Industry contacted him and said what are you going to do about Crystal Cox, I have 2 witnesses to this phone call.

Marc Randazza offered to be my attorney in my Obsidian V. Cox appeal and then used privileged information to conspire with the Plaintiff in that Case. Marc Randazza continues to harass me, have his friends threaten me, use big media to intimidate me and I am in fear of my life and quality of life of Marc Randazza and all attorneys of Randazza Legal Group.

Porn Industry Attorney Marc Randazza of Randazza Legal Group has committed fraud on the courts. And has painted Blogger Crystal L. Cox in False Light, Defamed Crystal L. Cox and Committed a Hate Crime in this Regard.

Marc Randazza told me not to Appeal Obsidian Finance Group Vs. Crystal Cox. Attorney Marc Randazza who wanted to represent me in my Appeal, convinced me it was best not to appeal the 2.5 Million Judgement as this would then be used to lobby for new laws and be better for more people, namely his Porn Industry Clients.

I later found out that it was NOT in my, Defendant Crystal Cox's best interest nor the best interest of bloggers, citizen journalists and all citizens. Marc Randazza was trying to deceive me, pressure me to not appeal Obsidian V. Cox.

Turns out Marc Randazza did not want to represent me, Defendant Crystal Cox, in an Appeal, but instead wanted to cut a deal with the Plaintiff without my knowledge so that the case would never go to the Ninth. Attorney Marc Randazza told UCLA Professor Attorney Eugene Volokh that he represented me regarding an Appeal and therefore backed off Eugene Volokh from taking the case. I, Defendant Crystal Cox found out and let Eugene Volokh know that I fired Marc Randazza and did want Eugene to Represent me.

I, Defendant Crystal Cox did not buy any domain names, nor start any blog to intimidate a witness into not testifying. In fact, the record shows that I stated I wanted to go to Portland to Marc Randazza's Deposition and question him myself. Marc Randazza was Subpoenaed in Obsidian V. Cox, after the Trial. I, Defendant Crystal Cox am Pro Se in this matter and received copies of the Marc Randazza Subpoena.

My, Defendant Crystal Cox's blogs were not to intimidate a witness, but to expose an unethical attorney in order to warn other potential clients and victims of Marc Randazza and his gang of Attorney Bloggers who were inciting Hate against me and other Investigative Bloggers such as Desi Foxx and Monica Foster.

This Court has Denied Defendant Crystal Cox Due Process and erred when it issued an impermissible prior restraint when it issued a preliminary injunction against future speech, and seized intellectual property, content, blogs and domain names of Defendant Crystal Cox.

This Court has Denied Defendant Crystal Cox Due Process and erred when it issued a preliminary injunction against future speech without the requisite showings required to enter a preliminary injunction.

This Court has Denied Defendant Crystal Cox Due Process and erred when it issued a preliminary injunction against tortious interference, when as a matter of law, the tortious interference claim must fail. Plaintiff Marc Randazza has tortiously interfered with Defendant Crystal Cox's business, news media, blogs, and online content.

This Court has Denied Defendant Crystal Cox Due Process and erred when it issued a preliminary injunction in which has caused irreparable harm, when there was an adequate remedy at law, when there was no likelihood of success on the merits, and without considering the public interest?

This Court has Denied Defendant Crystal Cox Due Process and erred when it issued a preliminary injunction against invasion of privacy without the requisite showings required to enter a preliminary injunction.

This Court By Law must cure an unlawful prior restraint.

Regarding the Issue of Preliminary Injunction

Preliminary Injunctions are Unconstitutional.

Preliminary Injunctions are an “extraordinary remedy” which this case did not warrant.

A Judicial Order that prevents free speech from occurring is unlawful. (Erwin Chemerinsky, Constitutional Law; Principles and Policies 918 (2002) (“The Clearest definition of prior restraint is.. a judicial order that prevents speech from occurring:).

Prior Restraints are “the most serious and least tolerable infringement on First Amendment Rights.” Neb. Press Ass’n v. Stewart, 427 U.S. 539, 559 (1976). There is a “deep-seated American hostility to prior restraint” Id at 589 (Brennan, J. concurring).

Injunctive relief to prevent actual or threatened damage is heavily disfavored because it interferes with the First Amendment and amounts to censorship prior to a judicial determination of the lawlessness of speech. See Moore v. City Dry Cleaners & Laundry, 41 So. 2d 865, 872 (Fla. 1949). “The special vice of prior restraint,” the Supreme Court held, “is that communication will be suppressed... before an adequate determination that it is unprotected by the First Amendment”. Pittsburgh Press Co v. Pittsburg Comm’n on Human Relations, 413 U.S. 376, 390 (1973). Also se Fort Wayn Books Inc. v Indiana, 489 U.S. 46, 66 (1989); M.I.C., Ltd v Bedford Township, 463 U.S. 1341, 11343 (1983.)

"Prior Restraints are Unconstitutional. Also see Post-Newsweek Stations Orlando, Inc. v. Guetzlo.

“RKA sought extraordinary relief in the form of prior restraint to enjoin .. . This relief is not recognized in this State, nor anywhere else in the Country. In addition to ignoring the First Amendment Rights and almost a century’s worth of common law, the .. court ignored virtually all procedural requirements for the issue of a preliminary injunction.” Page 5 Paragraph ii of Opening Brief Appellate Case No. 3D12-3189, Irina Chevaldina Appellant vs. R.K./FI Management Inc.;et.al., Appellees. Attorney for Appellant Marc J. Randazza Florida Bar No. 325566, Randazza Legal Group Miami Florida. "

This court should send Plaintiff, Attorney Marc Randazza a Strong message for his actions that are unlawful and unconstitutional regarding seizing domain names, deleting online content, chilling speech, suppress Free Speech and bullying defendants. Plaintiff’s actions are irreparable and he should be liable.

It is not lawful nor standard of practice to simply use a Preliminary Injunction to wipe out websites, blogs in the search engines that compete for certain search terms.

It is not lawful nor standard of practice to take away a Defendant's right to Free Speech simply by granting a Preliminary Injunction, and removing online comment that a Plaintiff Disagrees with, or feels is critical of Plaintiff.

**Plaintiff Marc Randazza sued Defendant Crystal Cox
for Exercising her First Amendment Rights**

This Court has Denied Defendant Crystal Cox Due Process and erred when it issued a preliminary injunction that was over-broad, subject to abuse and has caused Defendant Crystal Cox irreparable financial damage and suffering.

This Court has Denied Defendant Crystal Cox Due Process and erred when it issued a preliminary injunction denying Defendant Crystal Cox her right to Free Speech.

The essence of a prior restraint is that it places First Amendment protected speech under the personal censorship of one judge. (Bernard v. Gulf Oil Co., 619 F.2d 459, 486 (5th Cir. 1980) (State v. Globe Commc'ns, Corp., 622 So.2d 1066, 1073, (Fla. 4th DCA 1993), aff'd 648 So. 2d 110 (Fla. 1994)

Plaintiff Marc Randazza has shown no harm, much less irreparable harm.

This Case Lacks Constitutional Validity.

This Court has Denied Defendant Crystal Cox Due Process and erred when it issued an unlawful prior restraint. Such an injunction imposed unlawful prior restraint of speech, violating the First Amendment, with no constitutionally permissible justification. The Order represents an impermissible restraint on speech and was unjustified based on the evidence. The injunction is a content based restriction on speech, and thus must overcome strict scrutiny in order to stand. There is no "compelling state interest" at issue in this case.

The injunction has a fatal condition.

(Bantam Books, Inc. v. Sullivan 372 U.S. 58 (1963) (Organization for a Better Austin v. Keefe, 402 U.S. 415 (1971) The Supreme Court Struck down the injunction as "an impermissible restraint on First Amendment rights" Id at 417018, 418 n.l. In invalidating the prior restraint, the Court wrote, "no prior decisions support the claim that the interest of an individual in being free from public criticism of his business practises in pamphlets, or leaflets warrants the injunctive power of the court." Id at 419.

**The Preliminary Injunction in this Case against
Defendant Crystal Cox and Defendant Eliot Bernstein is Unconstitutional.**

If a court issues an injunction prior to adjudicating the First Amendment Protection of the speech at issue, the injunction cannot pass constitutional muster.

This court denied Defendant Crystal Cox Due Process in expressly skipping the essential step of adjudicating the First Amendment protections to the speech at issue.

This court denied Defendant Crystal Cox Due Process in failing to make any findings of fact or ruling of law, much less review of the blog articles and the First Amendment. Plaintiff Marc Randazza is a Public Figure. (New York Times Vs. Sullivan)

A Judicial Order that prevents free speech from occurring is unlawful. (Erwin Chemerinsky, Constitutional Law; Principles and Policies 918 (2002) ("The Clearest definition of prior restraint is.. a judicial order that prevents speech from occurring:).)

Prior Restraints are "the most serious and least tolerable infringement on First Amendment Rights." Neb. Press Ass'n v. Stewart, 427 U.S. 539, 559 (1976). There is a "deep-seated American hostility to prior restraint" Id at 589 (Brennan, J. concurring).

Injunctive relief to prevent actual or threatened damage is heavily disfavored because it interferes with the First Amendment and amounts to censorship prior to a judicial determination of the lawlessness of speech. See Moore v. City Dry Cleaners & Laundry, 41 So. 2d 865, 872 (Fla. 1949). "The special vice of prior restraint," the Supreme Court held, "is that communication will be suppressed... before an adequate determination that it is unprotected by the First Amendment". Pittsburgh Press Co v. Pittsburg Comm'n on Human Relations, 413 U.S. 376, 390 (1973). Also see Fort Wayne Books Inc. v Indiana, 489 U.S. 46, 66 (1989); M.I.C., Ltd v Bedford Township, 463 U.S. 1341, 11343 (1983.)

In this case, the Nevada Court has skipped the step of adjudicating the First Amendment protection relevant to the speech at issue. Prior Restraints are Unconstitutional. Also see Post-Newsweek Stations Orlando, Inc. v. Guetzlo.

"RKA sought extraordinary relief in the form of prior restraint to enjoin .. . This relief is not recognized in this State, nor anywhere else in the Country. In addition to ignoring the First Amendment Rights and almost a century's worth of common law, the .. court ignored virtually all procedural requirements for the issue of a preliminary injunction." Page 5 Paragraph ii of Opening Brief Appellate Case No. 3D12-3189, Irina Chevaldina Appellant vs. R.K./FI Management Inc.;et.al., Appellees. Attorney for Appellant Marc J. Randazza Florida Bar No. 325566, **Randazza Legal Group Miami Florida. This case is now hereby referenced here in, in it's entirety.**

**Marc Randazza is Using this Complaint to Further Intimidate Me
and it is Fraud on the Courts**

Defendant Crystal L. Cox claims that this complaint is being used for improper purpose, harassment, defamation, slander, and that the assertions in this Complaint are NOT warranted under these Rules and under applicable law.

Porn Industry Attorney, Marc Randazza of Randazza Legal Group claims that Blogger Crystal Cox registered the domain name MarcRandazza.com and then tried to extort money from him.

Porn Industry Attorney, Marc Randazza of Randazza Legal Group has conspired with others to create blogs that harass and attempt to intimidate Defendant Crystal Cox, such as Crystal-Cox.com, CrystalCoxBlows.com, CrystalCoxSucks.com and has started YouTube Channels to post lies and intimidation via names such as CaptainObvious. See Exhibit H.

Marc Randazza conspires with Attorney Kenneth P. White of PopeHate.com, Kashmir Hill of Forbes, Jordon Rushie of Philly Law Blog, Godaddy, Google Insiders and others to incite hate and spread criminal lies regarding Defendant Crystal Cox.

Porn Industry Attorney, Marc Randazza has committed Fraud on the Courts in Stating that high profile Investigative Blogger Crystal Cox offered to Sell him MarcRandazza.com and claiming that when he refused to buy the domain name or hire Defendant Crystal Cox, that Defendant Crystal Cox then posted negative blog posts and comments online regarding Marc Randazza and his company. And that after this refusal of internet Defendant bought the domain name of Marc Randazza's Wife. This is not how it happened.

Marc Randazza Has Conspired to Commit a Hate Crime.

Upon Knowledge and Belief of Defendant Crystal Cox, Marc Randazza Has Conspired with Kenneth P. White of Brown White and Newhouse, Jordon Rushie, Kashmir Hill of Forbes and countless others to intimidate and harass Defendant Crystal Cox.

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. David Aman has Violated this with conspiring with Sean Boushie, Marc Randazza and others to harm and intimidate me and I will be Filing a Federal Hate Crime Complaint and a Criminal Complaint.

Upon Knowledge and Belief of Defendant Crystal Cox, Plaintiff Marc Randazza is Suppressing my Free Speech and Interfering with my Business, Torturous interference. Plaintiff Marc Randazza is violating Anti-Trust Laws, Fair Use Laws and more in completely wiping out his search engine competition with a fraudulent lawsuit, and Plaintiff Marc Randazza has already succeeded before Defendant Crystal Cox and Defendant Eliot Bernstein even had due process, time to file an answer. Marc Randazza used the Las Vegas Nevada Courts to wipe out his competition for Free simply by lying to the courts and being believed with no proof, simply because he is a Las Vegas Attorney.

As to the Allegation of Obsessive Conduct, Too many Blogs, and too many links. And to ask this court to suppress the search engine results of one "obsessive blogger" is is a violation of Anti-Trust and Fair Marketplace Laws as well as a violation of Fair Competition Act (FCA), The Sherman Antitrust Act (1890), Antitrust Policy and Competition Law.

Marc Randazza has no legal right to attempt to suppress my right to compete in the search engines for any search term. Marc Randazza has no legal right to suppress my ability to get into the search engines for whatever search term I should want to get into the search engines for. Nor does Marc Randazza have a legal right to shut down my blogs, or my proprietary method.

Marc Randazza wants this court to give him an unfair advantage in the search engines, and to simply steal all my work over the last year. Marc Randazza wants this court to eliminate his search engine competition, and to suppress the ability of competing blogs, websites and those who operate such.

Laws governing fair competition are designed to maintain a competitive marketplace and Marc Randazza wants this court to eliminate the competitive marketplace for search terms related to his business and line of work. This is unlawful.

Antitrust law seek to make businesses compete fairly. Marc Randazza wishes the courts to violate Antitrust law and give Marc Randazza an unfair advantage by suppressing competition in the search engines.

I have every legal, lawful, fair market place, right to be better at search engine marketing and placement then Marc J. Randazza of Randazza Legal Group.

Plaintiff Marc Randazza commits Fraud on this Court in unproven Extortion Allegations

The only email correspondence I had regarding Plaintiff Marc Randazza paying for my services was me offering marketing before anything was placed on MarcRandazza.com and I certainly did not say I would post anything negative if he did not pay me.

That did not happen. Marc Responded to my asking if he needed a marketing expert or knew anyone who did by say this **“Asking me for a job, or a recommendation? That doesn't bother me in the least.** In fact, if you had displayed any ethics, I'd be game to do so.” He clearly did not have an issue, in his own words with me asking for a job.

The only other money spoken of in emails with Marc Randazza was him asking me to pay his expenses as my Pro Bono Attorney.

Plaintiff Marc Randazza speaks of my “dozens of victims”, this is not true. I have many people, companies I report on, just as big media reports on individuals and get to the top of the search engines for their names, It is not victims, it is people I report on, as I am New Media. I do not post baseless accusation, I have never done this. I get tips weekly, sometimes daily. I also do deep research and online investigations and research for my stories. Yes I have my own unique style, my Independent Product as it is my Blog, my Media, my Soapbox.

Obsidian V. Cox, Case CV-11-57-HZ U.S. District Court, District of Oregon was regarding one blog post on one blog. Obsidian V. Cox was not about Extortion, nor was the case about my “conduct”. It was regarding defamation accusations from a Court Appointed Attorney / Trustee in a \$40 Million Dollar Bankruptcy Case. In this case, Judge Hernandez ruled that I was not protected by Oregon Retraction Laws, Shield Laws nor the First Amendment. The case is on appeal in the Ninth Circuit (Case 12-35319), as Judge Hernandez Errored in his Ruling. I have Amicus Brief Support from EFF, the Electronic Frontier Foundation and From ScotusBlog.com as well as the Reporters Committee for Freedom of the Press.

MarcRandazza.com was registered by me to do PR on my Case. I never demanded money from Marc Randazza, and I never offered to remove any blog posts for any reason.

As for Calling Marc Randazza's wife a Slut, well that's my opinion based on Exhibit C, from Marc Randazza's own Blog, saying he knocked her up on a drunken tryst and so he may as well marry her. That was next to a picture of a mixed drink with the subtitle, “where babies really come from”.

Plaintiff Marc Randazza lies to this court in saying that my blogs were pay per clicks in which I received revenue. Godaddy, the Domain Name registrar had the domain names as pay per clicks and received any revenue, not me.

My intention was not to "misdirect" online searches as Plaintiff Marc Randazza suggests, my intention was to flat out get strong in the search engines and expose Plaintiff Marc Randazza, share my experience with Marc Randazza and report on Marc Randazza. Not to take his traffic and make money from it, this is simply not TRUE.

Defendant Eliot Bernstein received Domain Names in receivership in lieu of a Debt, this is well documented in the court records of Obsidian V. Cox. Part of those Domain Names were Domain Names connected to blogs that I own. Ownership of a Blog is separate then ownership of a Domain Name. Defendant Eliot Bernstein is not a Proxy, there was no Cyberfly Scheme and no attempt to evade seizure of domains. Either way I lost the ownership of the domain names, this is court documented. Plaintiff Marc Randazza is committing fraud on the courts in accusing Eliot Bernstein of this activity.

Monica Foster aKa Alex Melody is a Porn Industry Insider and an Investigative Blogger. She is exposing the dirty deed, corruption, and unethical actions within the Porn Industry. Monica Foster has a stalker named Sean Tomkins whom is protected by James DeVoy of Randazza Legal Group. Monica Foster contacted me long ago in order to offer support in my exposing the Porn Industry. In effort to help Monica Foster protect others, I gave her MarcRandazza.com and JenniferRandazza.com. Plaintiff Marc Randazza threatened Monica Foster and even posted the make and model of her car on a Porn Industry Forum encourage others to harm her, and talking about her death. Plaintiff Marc Randazza used a Godaddy Insider, as proven by emails to Monica Foster, in order to steal or cohearse JenniferRandazza.com from Monica Foster / Alex Melody. Alex Melody was in fear for her life as her address and vehicle had been outed publicly by Plaintiff Marc Randazza so she gave the domain name MarcRandazza.com back to me. Soon after this Plaintiff Marc Randazza filed a Domain Dispute Complaint with the CZECH Courts, and soon after this with WIPO regarding MarcRandazza.com.

Monica Foster / Alex Melody's 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.

Monica Foster discusses Porn Wiki Leaks, Corruption in the Adult Entertainment World, Possible Death of Donny Long, Jeremy Steele, Mike South, Manwin, LA Porn Industry, Measure B, Porn Industry Stalkers, Fabian Thylmann, AVN.com, Michael Whiteacre, Ari Bass, Fraud in the Porn Industry, Corruption in the Porn Industry, Murders and Suicides in the Porn Industry, Diana Duke of the Free Speech Coalition, xxxFilmjobs.com, Michael Fattorosi, J. Malcolm Devoy of Randazza Legal Group, Sean Tomkins Harassing Shelley Lubben, Brazzers, and Much More. Plaintiff Marc Randazza surrounds it all.

Monica Foster / Alex Melody has written books on the dangers of the Porn Industry and is a Porn Industry Whistle Blower. Monica Foster was threatened by Marc Randazza, she was offered money for MarcRandazza.com and JenniferRandazza.com by Plaintiff Marc Randazz and when she refused JenneferRandazza.com was stolen out of her Godaddy account by a Godaddy insider and given to Marc Randazza.

At some point Monica Foster aKa Alex Melody was afraid and apparently put MarcRandazza.com in the name of fellow Investigative Blogger Porn Industry Insider / Porn Industry Whistle Blower Diana Grandmason aKa Desi Foxx who is also Exposing Fraud, Corruption, Human Trafficking, Crimes and Unethcial Behavior in the Porn Industry.

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.

Diana Grandmason aKa Desi Foxx reports on Massive Corruption and Unethical Activity in the Porn Industry, Satanism in the Porn Industry, Religious "Rites" in Porn, Copyright Troll Attorneys such as Plaintiff Marc Randazza, Children's Online Privacy Protection and Keeping Porn out of Reach, and a whole lot more exposing the Porn Industry.

Diana Grandmason aKa Desi Foxx reports on Children Being Exploited in the Porn Industry and in fact reported on Plaintiff Marc Randazza Exploiting Children in an article entitled, "Copyright Troll Lawyers – Meet Porn Valley and Hollywood Extortionists – America's Justice System Enables Them to Stalk, Bully and Blackmail YOU! They Also Enable Sex Trafficking of YOUR Daughters!!" written in April of 2012, as seen in Exhibit J. This article was also about Human Trafficking, Blackmail, Bullying, Sex Trafficking, Hollywood Extortionists, and More.

Monica Foster / Alex Melody's of PornNewsToday.com has interviewed iViewit Technology Founder Eliot Bernstein, who is also one of the inventors of the iViewit Technology in which the Porn Industry uses every minute of ever day and does this knowingly infringing on the iViewit Technology. Plaintiff Marc Randazza knows that Defendant Crystal Cox and Investigative Blogger Monica Foster / Alex Melody have reported on the iViewit Technology and Plaintiff knows that his client owe Eliot Bernstein hundreds of Millions of Dollars, this is why Plaintiff Marc Randazza has drug Monica Foster / Alex Melody into this lawsuit and another reason why Plaintiff Marc Randazza want to silence Investigative Reporter / Blogger Crystal L. Cox.

Plaintiff Marc Randazza conspired with Judge Marco Hernandez and Plaintiff's Attorney in Obsidian V. Cox, and Plaintiff Marc Randazza accused me of extortion without Defendant Cox having due process and rights by law on this accusation. Plaintiff Marc Randazza interfered with my Filing for a New Trial and is directly responsible for the Judges Commits in the New Trial Denial of Extortion, when Extortion was no part of the Obsidian V. Cox Court Case. Plaintiff Marc Randazza used privileged information I gave him against me to sabotage me getting a new trial.

Plaintiff Marc Randazza has conspired with others to harass me, threaten me, defame me, intimidate me, endanger my life, keep me in a constant state of upheaval and stress and watching my back, and has violated my constitutional rights for over a year now.

Marc Randazza represents the The Media Bloggers Association (MBA), a United States membership-based, non-partisan voluntary association describing its activity as "supporting the development of 'blogging' or 'citizen journalism' as a distinct form of media". Yet Marc Randazza is suppressing the Free Speech Rights, Constitutional Rights, Civil Rights of one of the biggest Independent Bloggers, Citizen Journalists on the Internet, whom is involved in the biggest First Amendment Case to ever happen to one blogger.

Trademark Issues

Regarding Trademark issues, Defendant, Attorney Marc Randazza uses Marco Randazza as his Twitter and YouTube User Name, as well as his username on his own blog. Defendant, Attorney Marc Randazza had no TM posted at his blog regarding the name Marc Randazza as beign trademarked and Plainiff Attorney Marc Randazza had no Trademark when purchased Defendant Crystal Cox purchased MarcRandazza.com to use as PR for Defendant Crystal Cox's highly public First Amendment Case.

Marc Randazza has no common law trademark on his website, he had no Trademark when I purchased the domain names yet seems to have convinced WIPO that he is the rightful owner and has stolen several domain names from myself and Defendant Eliot Bernstein of iViewit Technologies.

Marc Randazza had no lawful Trademark on the name Marc Randazza at the time Blogger Crystal Cox purchased Domain Names, nor at the Time iViewit Technology Eliot Bernstein received Domain Names in Receivership.

If such names are Trademarked then it is the responsibility of Godaddy to NOT knowingly take the money of their clients knowing full well the names will be taken, and that Godaddy will help the client LOSE the names they paid Godaddy year after year to renew. Godaddy Sells Domain Names that are allegedly Trademarked and those who buy the Names from GoDaddy, are then Liable, even though they have no knowledge of a Trademark.

Plaintiff Marc Randazza has no common law trademark, and if this court rules that Plaintiff Marc Randazza has a common law trademark, then this is only in the state of Nevada.

Plaintiff Marc Randazza has no federal trademark regarding the name Marc Randazza and in fact uses MarcoRandazza on his blogs, his twitter account, his youtube account and other online accounts. Plaintiff Marc Randazza has no legal right to MarcRandazza.com nor any of the other dozens of domain names and blogs that this court has enabled Plaintiff Marc Randazza to seize, delete, change links, divert traffic and ruin my intellectual property.

Marc Randazza is NOT a common household name. Marc Randazza has no Trademark.

Because Complainant Marc Randazza has ties to illegal activity, he cannot claim legitimate rights to his name as a famous mark. The doctrine that plaintiff must come into a court of equity with "clean hands" is a reflection of the equitable nature of trademark law. A plaintiff who requests the assistance of a court of equity must not himself be guilty of inequitable conduct.

Plaintiff Marc Randazza is a High Profile Outspoken, Woman Hating Lawyer.

Defendant Crystal Cox has every right to make fun of, expose and speak out against Plaintiff Marc Randazza. Plaintiff Marc Randazza is a Hypocrite, a Civil Rights Violating Lawyer, a Woman's Rights Violating Lawyer as in the Sandra Fluke Bashing by Marc Randazza in support of Rush Limbaugh. Plaintiff Marc Randazza is an unethical attorney who bullies and puts down his own clients, all the while making deals NOT in their best interest. Defendant Crystal L. Cox has every right to blog as much as I want about Marc Randazza in order to warn the Public About Plaintiff Marc Randazza and hopefully save others from what Plaintiff Marc Randazza has done to me and to those I receive tips on.

Plaintiff Marc Randazza has no right to suppress my review sites, gripe sites and parody sites. Plaintiff Marc Randazza has no proof of extortion and has falsely accused Defendant Crystal L. Cox.

Defendant Crystal L. Cox has never offered Marc Randazza to buy any domain names at ANY price, in fact the record, Exhibit A, shows that Marc Randazza offered Defendant Crystal L. Cox money for MarcRandazza.com and I flatly refused. As did Alex Melody aKa Monica Foster when Plaintiff offered her money to buy the domain name. In the case of Alex Melody aKa Monica Foster, Porn Industry Whistle Blower, Plaintiff Marc Randazza did not take NO for an answer. He Stole JenniferRandazza.com out of her Godaddy Account, and when she refused to SELL MarcRandazza.com he threatened her, and posted her make and modes of car on a Porn Industry Forum and slammed her, and wished her death. And encouraged others to slam, taunt and harass Alex Melody aKa Monica Foster.

In fact, Plaintiff Marc Randazza told Alexandria Melody about his Godaddy Insider and he tried to get her to conspire against Defendant Crystal Cox, she refused. Plaintiff Marc Randazza and his friends put Alex Melody aKa Monica Foster in fear of her life and livelihood so she gave MarcRandazza.com back to me. I took it with dignity and strength and stood up to Plaintiff Marc Randazza so as to warn others of what he was capable of and is doing.

In fact Plaintiff Marc Randazza, Randazza Legal Group, James Devoy works with Sean Tomkins who has stalked, threatened and harassed Alex Melody aKa Monica Foster for years. Alex Melody aKa Monica Foster has reported on this and this is another reason Marc Randazza wants her silenced as well.

Plaintiff Marc Randazza has been witnessed at several INTA meetings with Peter L. Michaelson, who was the Sole WIPO Panelist making the decision in the WIPO Domain Name dispute with Marc Randazza as the Complainant and Eliot Bernstein iViewit Technology and Crystal L. Cox as the Respondent.

Plaintiff Marc Randazza has cronies in the INTA who favor him such Marc Randazza's buddy Scott Donahey who Argued that Bad Faith is "retroactive" when registering domain names? Just so that Marc Randazza could win a WIPO Action for Big Pharma.

Currently Defendant Eliot Bernstein and Defendant Crystal Cox have disputed the WIPO findings regarding a WIPO decision in which Plaintiff Marc Randazza was involved in, and involved both Defendant Eliot Bernstein and Defendant Crystal Cox. It has been discovered that Sole WIPO Panelist Peter L. Michaelson is in massive, undisclosed conflicts of interest with Complainant / Plaintiff Marc Randazza as with is perpetual INTA Meetings together and secret Deals. Sole WIPO Panelist Peter L. Michaelson is in massive, undisclosed conflict of interest with those involved in stealing the Video Technology of iViewit Technologies and Inventor Eliot Bernstein, such as MPEG LA, Proskauer Rose Attorney Kenneth Rubenstein, Ex Supreme Court Judge Judith Kaye and others involved in stealing the iViewit Technology and suppressing the Patent Rights of iViewit and of Eliot Bernstein.

Peter L. Michaelson knows of SEC Complaints, RICO Complaints, USPTO Complaints and massive Legal Action over the iViewit Technology. Peter L. Michaelson used WIPO in a way to silence my blogs reporting on the iViewit Technology Case.

Peter L. Michaelson refused to sign a conflict of interest disclosure in making his WIPO Decision and in fact committed defamation and is involved in criminal and civil conspiracy in his public statement that Respondent Eliot Bernstein iViewit Technology Founder and inventor of the iViewit Technology and Crystal L. Cox, Investigative Journalist Reporting on the iViewit story for over 3 years.

WIPO is involved in the iViewit Technology legal action with European Patent Office Cases.

Defendant Eliot Bernstein and Defendant Crystal Cox have had phone calls with the Office Of WIPO Director Francis Gurry and have notified WIPO of this massive Criminal and Civil Conspiracy.

Defendant Eliot Bernstein and Defendant Crystal Cox will be filing RICO Complaints, Legal Action and Criminal Complaints against WIPO and Sole WIPO Panelist Peter L. Michaelson.

Marc Randazza wants to Silence Blogger Crystal Cox, and STOP the iViewit STORY from being Heard.

Corbin Fisher, Manwin, and ALL of Marc Randazza's clients infringe on the iViewit Video Technology. This lawsuit is to suppress information regarding this 13 Trillion Dollar technology and to attempt to discredit iViewit Founder and one of the iViewit Inventors Eliot Bernstein. Alex Melody aKa Monica Foster interviewed Eliot Bernstein regarding iViewit and has extensively reported on the iViewit Store and specifically on the Porn Industry using the Technology. This is why Plaintiff Marc Randazza is fighting to discredit Alex Melody aKa Monica Foster in this legal action.

I, Defendant Crystal Cox have been an investigative blogger reporting on corruption for years, I have over a thousand blogs all connected to the iViewit Technology Story. Plaintiff Marc Randazza wants to silence Defendant Eliot Bernstein and Defendant Crystal Cox and there by silence the 13 Trillion Dollar iViewit Technology Story and limit the massive liability of Plaintiff's Porn Industry Clients who use the iViewit Video Technology every minute of every day, infringing on the technology rights of iViewit Technology, knowingly.

Upon Knowledge and Belief of Defendant Crystal Cox, Plaintiff Marc Randazza has Conspired with Others to Intimidate, Harass and Defame Defendant Crystal Cox for nearly a year now.

Plaintiff Marc Randazza controls blogs, sites Crystal-Cox.com, CrystalCoxBlows.com, CrystalCoxSucks.com, CrystalsTumblingCox (TumblingCox) on Twitter, Crystals Tumbling Cox - YouTube, and more in which harass Defendant Crystal Cox, as seen in Exhibit H.

Plaintiff Marc Randazza has conspired with Attorney Kenneth P. White of Brown, White and Newhouse and owner of PopeHate.com, in order to Paint Blogger Defendant Crystal Cox in false light. Kenneth P. White is CaptainObvious on YouTube as well and has incited hate against Defendant Crystal Cox , thereby committing a Hate Crime.

Kenneth P. White has allowed friends to interact on his site and to threaten Defendant Crystal Cox, such as taking out my "Knee Caps".

SaltyDroid and others connected to Plaintiff Marc Randazza, constantly connect me with Julian Assange as seen in Exhibit H. They are trying to intimidate me, to protect Big Media's Monopoly on Free Speech.

Plaintiff Conspires with Jordon Rushie of Philly Law Blog, Kashmir Hill of Forbes, Kenneth P. White of PopeHat.com, and many others to accuse Defendant Crystal Cox of the Crime of Extortion in various media organizations, as the judge in this case called it. Yet, Defendant Crystal Cox has had no trial for the Crime of Extortion, no due process, no criminal complaint has been filed, and no conviction every issues regarding Defendant Crystal Cox and the crime of extortion. Yet they all defame Defendant Crystal Cox knowingly and with actual malice as they repeat over and over that Defendant Crystal Cox is guilty of Extortion and is an Extortionist.

Plaintiff conspired with Attorney David Aman in false accusations against Defendant Crystal Cox in the New York Times.

These Attorneys created an alternate Universe that made me to Look like and Extortionist when there was no extortion.

My blogs were to fight back, and have now been shut down and redirected in mass, as Godaddy has already gave them to Plaintiff Marc Randazza. Servers have been changed, damage has been done to Defendant Crystal Cox and without Due Process allowed to Defendant Crystal Cox.

I have every right to have a Search Engine Reputation Management Business. I have never extorted anyone. Marc Randazza and his gang of haters, attorney bloggers, and Big Media Connections have painted me in false light, defamed me, harassed men and all to make me look "bad" because I am the test case for Big Media to lose their stronghold, their Monopoly on Free Speech and the laws that protect them that seem to not apply to all citizens of the United States, even though there is no license required to be considered a journalist.

As Shown in Exhibit A, these Attorneys Steal Domain Names and Use Unethical means as seen in this comment on a Crystal Cox Bashing Video on YouTube by CaptainObvious aKa Kenneth P. White or Jordan Rushie of Philly Law Blog.

Hate Videos by Captain Obvious Says:

"Captain Obvious [2 weeks ago](#)

Everyone who is a victim of Cox needs to know they can win against her. Do NOT make the following mistakes (1) seeking a multi-member panel - that is a typical large firm response to an idea (2) going after trademark rights (3) don't treat the arbitration like a complaint that can be amended or augmented with discovery – treat it like an arbitration."

Defendant Crystal Cox Demanded an Impartial 3 Panel Member at WIPO, Instead I got one Panelist Peter L. Michaelson, INTA friend of Marc Randazza who is in serious conflict with the iViewit Technology theft of which Defendant Crystal Cox has written on for years. iViewit was founder by Eliot Bernstein.

These attorneys ganged up on me to discredit me and steal my intellectual property and violate my Free Speech Rights. I don't have "victims", I am an Investigative Journalist / Blogger. I research documents, watch videos, interview insiders, get constant tips, take phone calls and I write stories on individuals and companies. They are story content, people I report on, NOT VICTIMS. I have never asked for money to remove information nor have I ever taken money to remove information.

I, Crystal L. Cox, in my Pro Se Capacity, Object to this Court having Jurisdiction over my Intellectual Property, and turning it over to Plaintiff Marc Randazza who has already wiped out my links, my online content, and my rights.

Hypocrite Attorney Marc J. Randazza took all my Free Speech Rights, my Content Rights, my Intellectual Property Rights, Thousands of Blog Posts Redirected to His One Blog Post Defaming, Harassing and Threatening Defendant Crystal Cox.

Plaintiff Marc Randazza posted lies on his blog about Summit Bankruptcy / Obsidian Finance Group Whistle Blower and refused to let her comment and defend these lies. Plaintiff Marc Randazza has harassed, defamed, intimidated and threatened this mother of 3. As Show in Exhibit I

Marc Randazza Continually Harasses and attempt to intimidate Defendant Crystal Cox

Attorney Plaintiff Marc Randazza continues harass, intimidate and threaten Defendant Crystal Cox to stop my Ninth Circuit appeal and set precedence to steal Defendant Crystal Cox's Blogs exposing the iViewit Technology Story. The Obsidian V. Cox appeal is the biggest independent blogger case to test the courts regarding bloggers being treated equally under the law as traditional journalist and blogs being media and the laws which apply.

Defendant Cox is an Online Media, SEO Expert

I have been marketing online extensively for over 10 years. I have owned my own real estate company since 2000. I have written books, owned a publishing company, owned and operated a Forestry Business, owned and operated a restaurant, developed housing and land developments, ran over a thousand blogs and sold nutritional supplements.

Starting in 2005 I began investing in the real estate of the Internet, Domain Names. At this time I attended Traffic West and other Trade Show of the Domain Name Industry. I learned about the Domain Name Industry extensively and about Domain Aftermarkets, Domain Auctions, Domainers in General and the issues surrounding.

I buy domain names with keywords in the domain name that is based on the story I am writing about, this is industry expert ways to get strong in the search engines. This has never been to extort any person, official, or company.

I have subscribed to Planet Oceans Search Engine News since 2005. This is a highly indepth search engine news, and described years ago about the process of getting the best keyword rich domain name possible for what you are trying to get found in the search engines, often time that includes the names of those involved in the story I am reporting on. This yearly Search Engine News report also discussed many other techniques in which I have used for over seven years.

Also starting around 2005 I read the book what would google do, and it talked about googling your company sucks, and that this was a way to beat your competition by protecting your company name and more on that topic. I have read massive books on search engine optimization and marketing. I have also Read documents, took online courses, watched massive videos and they all talk about getting the best keywords in your Domain Name regarding what your trying to get found in the search engines.

This is why I bought domain names with the name of my subject matter. **I never bought a Domain Name to extort anyone, EVER.**

I am a Media Defendant in this case and my blogs regarding Marc Randazza are presently to expose the unethical activity of Marc Randazza and those at Randazza Legal Group participating in Stalking Rings, Blogger Rings attacking those in the Porn Industry, and to expose the unethical, illegal activity going on in the Porn Industry.

Marc Randazza is a high profile Porn Industry Attorney. As my blogs got on top of the search engines I began to get tips from Porn Industry Insiders, those inside the Copyright Cases Marc Randazza was involved with, those whom had dealing personally with Marc Randazza and those who had information or tips regarding Marc Randazza or those at Randazza Legal Group.

I also received tips on The Court Case United States vs Hemmer, 729 F.2d 10, implicating how Marc Randazza got out of this and mafia connections to this Case.

I Received Tips on Plaintiff Marc Randazza and inside connections with Scott Donahey, Tom Halket and others in the INTA, which favored Randazza and helped him to win WIPO and Trademark Disputes.

I Received Tips on Plaintiff Marc Randazza connected to a ring of bloggers who were attorneys that intimidate, threaten, harass and set up those in the Porn Industry who threaten to blow the whistle on them.

I Received Tips on Plaintiff Marc Randazza's connections to PornWiki-Leaks, Sean Tomkins, Manwin, Corbin Fisher Cases, Porn Industry Attorney Michael Fattorosi, J. Malcolm Devoy, the Free Speech Coalition, Ari Bass (aka Michael Whiteacre), Big Media Connections, NPR Connections, Information regarding playing both sides of legal case and much more.

I am an investigative journalist, blogger and have been for over 7 years. I used these blogs to expose, report on Plaintiff Marc Randazza and issues surrounding him that are of Major Public Concern. Now, Godaddy has given Randazza all my domain names, and all those links are now dead, content gone, and permanent damage done to my Anti-Corruption, Whistle Blower Media Blog Network.

The blogs I had were regarding Marc Randazza in a way to warn others what could happen to them, to expose what has happened surrounding the legal cases Marc Randazza is involved with, to share my Experience with Attorney Marc Randazza, to be Gripe Sites, to be a Parody and to make fun of Marc Randazza. Defendant Crystal Cox's blogs are not, nor have ever been to solicit money from Marc Randazza nor any of his attorney buddies, allies, or lynch mob friends. I have never asked Marc Randazza for money to remove any blog posting, nor would I EVER. I am dedicated to exposing Marc Randazza, Posting Facts, Documents and Information to the best of my ability in effort to warn others of what can and does happen.

Defendant Crystal Cox's, Marc Randazza blogs are also about getting strong in the Search Engines so that those with information on the Legal Cases, Porn Companies, Human Trafficking, Copyright Trolls, Issues Surrounding Marc Randazza, and more can find me and email me tips and information so that I can write more investigative reporting on those important issues.

Defendant Crystal Cox's, Blogs currently discuss issues such as Plaintiff Marc Randazza defending Rush Limbaugh and fighting directly against women's rights in his rant against Sandra Fluke, this was big in the media at the time my Marc Randazza blogs started. Marc Randazza claimed that it was un-American to Silence Rush Limbaugh, while at the same time doing everything he could to silence an Investigative Blogger who was once his client, from speaking out against him.

Defendant Crystal Cox currently make a living marketing and Selling Nutritional Supplements for Good Life International, Defendant Crystal Cox does not make a living with Search Engine Reputation Management. It is a skill I Defendant Crystal Cox am very good at and would love to have an income from such, however I don't make a living this way. I have never, ever posted information and asked anyone for money to remove such information.

The intention of Defendant Crystal Cox's Anti-Corruption Investigative Blog Network was and is to expose corruption, and to use Defendant Crystal Cox's investigative blogging skills to get on top of the search engines with my news, research, commentary, tips, videos and more. That is the point of internet marketing and new media. Part of this is buying a keyword rich domain name and having many blogs. In the case of Plaintiff Marc Randazza. I would have stopped at a few blogs. However Plaintiff Marc Randazza is a powerfully connected attorney. Randazza has lots of friends in the tech industry, at Google, at Word Press, at Godaddy and tons of attorney bloggers who post whatever he says is true regardless of any facts or documents. Marc Randazza got my blogs shut down by using inside connections to Chill Free Speech, so I started new ones. The more he got shut down, the more his attorney friends attacked me and threatened me on their blogs and forums, the more blogs I started to ensure that the facts, the emails, the documented proof of my side of the story got found.

My then Attorney Marc J. Randazza told me that I should NOT Appeal Obsidian V. Cox to the Ninth Circuit as this was in the best interest to Lobby for Shield Laws.

Marc Randazza encouraged me not to Appeal Obsidian Finance Group Vs. Crystal Cox, he said I had made a mess of the case and if I went to the Ninth it would make a mess for the rest of "us". As it stood, my "mess" was only in a lower court and only hurt me, "the Client". If I appeal it could set a precedence that was bad for the Porn Industry, and others affected by Free Speech Legal Cases. This was not in the "Client", my best interest, but instead in the best interest of his other well funded Clients.

Attorney Marc Randazza acted as if he would represent me in an appeal, while encouraging me not to appeal and all the while letting the appeal filing date clock run out. Attorney Marc Randazza who wanted to represent me in my Appeal, convinced me it was best not to appeal the 2.5 Million Judgement as this would then be used to lobby for new laws and be better for more people, namely his Porn Industry Clients.

Marc Randazza had represented Eiland - Hall in Beck v. Eiland-Hall over the domain name **GlenBeckRapedAndMurderedaYoungGirlIn1990.com**, I read that case and all the reasons why Marc Randazza professed that Eiland - Hall had a right to that domain name. Yet after I emailed Marc Randazza on having the domain name, in which I had done nothing with, he got angry. Randazza said I had no right to it even though he prevailed in Beck v. Eiland-Hall and other similar domain disputes. Marc Randazza demanded I give him the name. I said no. Randazza offered to buy the domain and I said I did not want to sell it. Marc Randazza then threatened that I would make him an enemy and did I really want that?

On December 10th, 2011, one of my investigative reporters / bloggers, Michael Spreadbury contacted Attorney Marc Randazza as he was in the news over the TSA Issues. As shown in Exhibit A, Michael Spreadbury set up a phone meeting, a conference call with Attorney Marc Randazza in regard to Attorney Marc Randazza representing me, Defendant Crystal Cox, in my Obsidian Finance Group V. Cox Appeal to the Ninth Circuit. (**Oregon Civil No. CV 11-0057 HZ**) On this first call Marc Randazza asked for all my files, of which I emailed him and is confirmed in Exhibit A. Also on this call Marc Randazza told me that he had received a call from Porn Industry Big Wigs and they asked Attorney Marc Randazza what he was going to do about Crystal Cox. Attorney Marc Randazza, convinced me on this call that Appealing to the Ninth was not in the best interest of my case or of others affected by my precedent. Attorney Marc Randazza told me that my case may be best used to lobby for new laws just how it stands, specifically a Federal Shield Law, And this would mean, me, not going to the Ninth Circuit Appeal Court. This call was witnessed by two individuals.

I discussed my strategy and plan for my case with Marc Randazza on this First Call, Phone Meeting.

On this First Call with Marc Randazza, he told me that whatever happens he WILL NOT hurt the First Amendment. Yet this court shutting down thousands of blog posts, and years worth of work and stealing my domain names, redirecting my blogs and flat out lying about me in order to silence me, is a Direct Attack on the First Amendment Rights of All.

Currently Godaddy, has given Marc Randazza a large amount of my domain names, based on a court order that says a Pending TRO, pending On a Hearing. These domain names released to defendant, illegally have unlinked thousands of links to my intellectual property, and all without my due process. The content on those posts is dropped forever, due to this illegal action of Godaddy. As the domain names were to be locked pending a hearing, pending a trial, pending due process. Instead Godaddy released the domain names and allowed the Plaintiff to changed the servers thereby unlinking a years worth of links dozens of blogs and thousands of posts. This is unlawful, unconstitutional and this court should make Marc Randazza pay Defendant / Counter Plaintiff Crystal Cox 7 Million Dollars. I have a right to price my intellectual property as what I would value it at.

Also on this first call between Defendant Crystal Cox and Plaintiff Marc Randazza, he told me that he used to represent Big Media, and that **they did not want him to go for the broader Free Speech precedence**, so he quit working for them and instead works for Bloggers and the Porn Industry. **He said that Big Media told him that they make more money on a MONOPOLY of Free Speech.**

Now, Hypocrite Attorney, Plaintiff Marc Randazza is suppressing my Free Speech Rights and supporting Big Media in trying to STOP my Appeal to the Ninth. For, if I win my Appeal then "Big Media" loses their **Monopoly on Free Speech** and loses their century old stronghold as Media manipulating a society and protected to do so by special laws and protective rights just for this established "Media" and Journalists associated with this "Media". And rights in which citizen journalists and citizens over all do not have.

Plaintiff Marc Randazza now seems to be working with Big Media to STOP my Appeal, to Defame and Discredit me, in order to STOP this One Blogger from Setting a Massive Precedence in which **ONCE AND FOR all ENDS the Monopoly of Free Speech in which Big Media Currently Has.**

Plaintiff Marc Randazza has worked with others to silence me, threaten me, intimidate me for nearly a year now. All to STOP me from going to the Ninth Circuit and to SUPPRESS the iViewit Technology Story.

On my First Call with Marc Randazza he said there was no higher court decision that distinguished bloggers from journalists or supported the journalistic rights of bloggers. My case will do this one way or the others, and Marc Randazza claims to be an Intellectual Property Expert, a Domain Law Expert, a First Amendment Advocate, yet Plaintiff has used every means necessary to destroy my intellectual property, defame me, harass me, bully me, suppress my free speech rights, deny me due process and I, Defendant Crystal Cox have every right to expose, parody, review this hypocritical behavior.

It is my legal, civil, constitutional right. Of which this court has already denied, BEFORE my answer deadline has passed. My blogs have been STOPPED flat in the search, thousands of links redirected to Marc Randazza by Domain Names turned over to Plaintiff and servers NOT LOCKED but redirect to a Marc Randazza Blog Post exercising his Free Speech Rights and hating me, defaming me, discriminating against me.

After this December 10th, 2011 phone call, I, Investigative Blogger Crystal Cox bought MarcRandazza.com, as this was the best keyword rich available domain name out there at that time in order to discuss my appeal and the lawyer who was to represent me.

In the days that followed I had spoke with UCLA Professor of Law Eugene Volokh, and he expressed interest in taking my case as well, entirely for Free. Marc Randazza had wanted me to pay him at least \$5000 to start, though he called it Pro Bono.

At this time, and unknown to me Marc Randazza was negotiating a deal, with David S. Aman, Tonkon Torp Attorney for the Plaintiff in my Case. The terms of this deal have never been made available to me. It seems that it was a deal to make the case go away, to change the perimeters of the verdict and to stop the Ninth Court appeal. Marc Randazza, was working as my attorney in this negotiation, and at that time telling other attorneys in the First Amendment Bar that he, indeed would be representing me in this matter. I now believe this was to sabotage my appeal and protect Big Media.

Marc Randazza emailed me on December 14th 2011, and told me that he would represent me. Even though Marc Randazza had already been acting as my attorney, studying my documents, and talking a deal with Opposing Counsel.

Marc Randazza, at this time, was telling attorneys in the First Amendment Bar that he represented me and that he was talking a deal, thereby the case may not go to the Ninth. Eugene Volokh, UCLA Professor of Law called me and told me that he had spoke with Marc Randazza, and it seemed that Marc Randazza Spoke of this deal he was making, as my attorney with Opposing Counsel. Though Randazza had not talked of a deal with me, nor any proposed terms of a deal. Eugene Volokh said that Marc Randazza was a fine choice and that I should let him know if I needed anything, and that he would be talking with Marc Randazza throughout the case as needed to be of any assistance.

Marc Randazza treating me with such disrespect, negotiating a deal without my knowledge and interfering with the outcome of my case without my input left me feeling that my attorney had betrayed my confidence and had actually hurt my case. Marc Randazza had silenced me, though I was Pro Se for over a year and knew my own case better than anyone. Marc Randazza had disrespected me and it seems gave me massively bad advice in steering me away from appealing to the Ninth in order to benefit those in the Porn Industry / Free Speech Arena who he represented and was his biggest, long term pay check. I realized Marc Randazza was out to use me to help set a precedence or to not set a precedence, in order that his own clients would benefit from the ruling or the changes in how the ruling went in, as a matter of law.

After this, it was more than obvious to me that Marc Randazza should not be my Attorney. I emailed Marc Randazza and copied Attorney Eugene Volokh and in this email, as Exhibit A shows, told Marc Randazza how I felt, and fired Marc Randazza as acting as my Attorney in any way. I stated that I would only move forward with Eugene Volokh as my Attorney. Marc Randazza was upset but tried to save face with his peers so he acted as if all was well, and even apologized for his behavior.

Approx. one month later, believing that Marc Randazza really was ok with me firing him. And after our original call of me discussing what I do and the extortion allegations and how they were not true. And on this first call discussing that he did not believe what I did was extortion and that he understood my marketing methods. I felt safe in emailing him and asking him for a marketing job. I had not done anything with the domain name MarcRandazza.com. Even though I felt he had betrayed me, I had a new attorney I was happy with and so I did not expose Marc Randazza for what he had done that I felt was unethical as his client.

I emailed Marc Randazza and asked him if his law firm, himself or anyone he knew could use my marketing skills as I needed to make some money. As seen in Exhibit A. I told him that I had bought MarcRandazza.com when I thought he was to represent me, in order to do my own PR for my case.

Marc Randazza responded to this eMail, very aggressively. Plaintiff Randazza demanded that I turn over the domain name immediately and told me I had no right to register a domain name that resembled his name. It was certainly assumed that Marc Randazza did not want that name, as over the prior ten years he had not registered the domain name and had went by **MarcoRandazza** in his Twitter Account, YouTube Account and his username on his own blog. Marc Randazza has letterhead at one time that stated he was a domain name lawyer. Randazza has been touted as a domain name expert, domain name attorney and a friend to domainers.

After this dialogue, Marc Randazza had to find another way to sabotage Obsidian V. Cox and the Ninth Circuit Appeal, as well as to discredit Defendant Crystal Cox's blogs exposing the biggest technology crime in the world, iViiewit. So Plaintiff Marc Randazza contacted the Plaintiff's attorney in Obsidian V. Cox (opposing counsel to pro se Crystal Cox in Obsidian V. Cox) and made a deal to be subpoenaed in my case and testify to set me up for extortion of which never happened. I was Pro Se in that Matter and so I responded to the legal documents by stating that I wanted to attend the deposition and that I wanted to cross examine Marc Randazza. Exhibit B is a court document I filed and sent to Marc Randazza in my Pro Se Capacity discussing the questions that I would be asking at the deposition. Marc Randazza never attended the deposition and no official reason was given.

I had, at that point, filed a motion for a new trial and was headed toward the appeal process for Obsidian V. Cox. Marc Randazza was talking to Opposing Counsel and to Judge Marco Hernandez who was deciding on matters in my case. Marc Randazza had privileged information and strategy information and used this against me. Also Marc Randazza was flat out lying about me, defaming me and conspiring to set me up for extortion.

So I then used MarcRandazza.com to expose what Marc Randazza was doing and to get strong in the search engines as quick as possible to get my story with documented facts heard, before Marc Randazza conspired to make his lies about me stand as the truth in the legal arena and public opinion.

His revenge amped up, so I bought more related domain names to start more blogs and expose his hypocrisy and to warn other potential clients of what he had done to me. At this time Marc Randazza conspired with Wordpress, Google Insiders, Godaddy Insiders and more to get my blogs shut down, to make them look as spam or flat out have them deleted. So I started more and more to fight back in the search engines and make sure that my documented facts of the matter were in public view to protect my reputation, my case, my future and my quality of life.

I, defendant Crystal Cox did not buy any domain names, nor start any blog to intimidate a witness into not testifying. In fact, the record shows that I stated I wanted to go to Portland to Plaintiff Marc Randazza's Deposition and question him myself. Marc Randazza was Subpoenaed in Obsidian V. Cox, after the Trial. I am Pro Se in this matter and received copies of the Marc Randazza Subpoena.

In order to Sabotage Defendant Crystal Cox's Ninth Circuit Appeal and Suppress Defendant Crystal Cox's investigative blogs exposing those involved in stealing the iViewit Technology, Plaintiff Marc Randazza contacted, David Aman, Tonkon Torp Attorney in Portland who is the attorney for Opposing counsel and Marc Randazza told David Aman to have him deposed and he would testify to me extorting him. It seems that David Aman then agreed if Marc Randazza would testify against me, Pro Se Defendant Crystal Cox, that Opposing Counsel David Aman would see that Marc Randazza would get ownership of MarcRandazza.com, which I owned as of December 10th 2011 the day I had a phone meeting and Marc Randazza was to represent me in my Obsidian V. Cox Appeal to the Ninth Circuit, or so I thought.

Once I, defendant Crystal Cox received word of Marc Randazza being Subpoenaed, I, in my Pro Se Capacity emailed Marc Randazza and the Courts a Motion to put into the record regarding the questions that I intended to ask Marc Randazza in the Deposition. After Marc Randazza saw this document, this list of questions, he somehow cancelled his Portland Oregon deposition in the Obsidian V. Cox Matter. I am not sure how Marc Randazza got out of this Deposition, as he was served. I was never told how Marc Randazza ended up not going to this Deposition. It is my belief that Marc Randazza cancelled because he did not want questioned by me, his former client, under oath.

I have, to this day not been notified of the "Official" reason why Marc Randazza did not attend that deposition, even though I am Pro Se in the Matter, and have every legal right to that information.

See the Exhibit B for the exact words of the deposition questions I served on Marc Randazza and in which he refused to answer and to show up for this deposition.

Soon after the Deposition that Marc Randazza failed to show up to, Marc Randazza recommended a Las Vegas "Receiver" to help Opposing Counsel David Aman to take Domain Names so that Marc Randazza could get a hold of **MarcRandazza.com** and seek revenge on me. This is in the Obsidian V. Cox court docket as Motion for Receivership, the Receiver that

Randazza recommended to David Aman, Opposing Counsel Was Lara Pearson who Marc Randazza had used in Receivership issues regarding Righthaven. Attorney Lara Pearson of the Rimon Law Group was the court-appointed receiver in that case. Marc Randazza connected her with the Plaintiff, Opposing Counsel David Aman in order to seek revenge on a former client, me, Crystal Cox.

I, defendant Crystal Cox Fired Marc Randazza, and he continued to use privileged information against me and work with the Plaintiff in Obsidian Vs. Cox in order to pressure me to STOP my appeal to the Ninth Circuit.

I, Defendant Crystal Cox later found out that it was NOT in my best interest nor the best interest of bloggers, citizen journalists and all citizens. Marc Randazza was trying to deceive me, pressure me to not appeal Obsidian V. Cox.

Turns out Marc Randazza did not want to represent me in an Appeal, but instead wanted to cut a deal with the Plaintiff without my knowledge so that the case would never go to the Ninth. Attorney Marc Randazza told UCLA Professor Attorney Eugene Volokh that he represented me regarding an Appeal and therefore backed off Eugene Volokh from taking the case. I found out and let Eugene Volokh know that I fired Marc Randazza and did want Eugene to Represent me.

I, Defendant Crystal Cox now believe that Marc Randazza was sent in to **sabotage my Appeal** so that his clients such as Manwin, Corbin Fisher and other Porn Industry Giants, would not be affected by legal case setting a First Amendment Precedence for them. When it failed to represent me, as he negotiated without my consent, talked down to me and mistreated me and was therefore FIRED by Me, then Marc Randazza

I found out that Plaintiff Marc Randazza was negotiating a deal with Plaintiff Kevin D. Padrick of Obsidian Finance Group and his attorney David Aman, through UCLA Professor, Attorney Eugene Volokh who is now representing me on my Ninth Circuit Appeal of Obsidian V. Cox. Once I found Out, I Fired Marc Randazza Immediately as Email Records Show.

**Upon Knowledge and Belief of Defendant Crystal Cox, Regarding
Judge Gloria Navarro, Acting in Conspiracy, Upon the Knowledge and
Belief of Pro Se Litigant Crystal L. Cox**

Judge Gloria Navarro GRANTED Plaintiff Marc Randazza a Preliminary Injunction in which caused me irreparable harm and did not preserve the status quo, and therefore is liable for the actions that have damaged me, Defendant / Pro Se Litigant / Complainant Crystal Cox.

I, Defendant / Pro Se Litigant / Complainant Crystal Cox, believe that Judge Gloria Navarro discriminated against me, violated my rights of due process, violated my Constitutional Rights, and conspired with the Plaintiff in such way that has caused me irreparable harm, endangered me, ruined my business, defamed me, intimidated me and put me under massive duress.

Regarding Document 14, dated, 12/14/2012 , ORDER Signed by Judge Gloria Navarro to Schedule a Hearing for a Motion for a Preliminary Injunction.

Document 14, dated, 12/14/2012 was an ORDER signed by Judge Gloria Navarro in which issued a hearing notice for a Preliminary Injunction. This order discussed Defendant Crystal Cox's date deadlines for her Response, and Plaintiff's date deadline for a Reply to that response. This Court Order, Docket Entry 14 set a hearing date for this matter to be January 7th, 2013.

Note that I, Pro Se Litigant Crystal Cox did not get Electronic Access to this case until January 3rd 2013. After Docket Entry 14.

This order was not a Granting of the Preliminary Injunction to seize my blogs and domain names and attempt to put a gag order on me, it was an **Order setting a hearing**. However the order also accused me of "bad faith", and what seems to be extortion, and offering reputation services after I asked Plaintiff for a job, which is not factual, and shows that Judge Gloria Navarro favored Plaintiff, as there was no proof that this happened, only the statement of the Plaintiff. I, Defendant Crystal Cox, provided "the Court" the actual eMail of my asking for a job, and no word had been posted on ANY of my blogs regarding Plaintiff at that time, there was no offering to "clean up" any "reputation" that I, Defendant Crystal Cox had cause for I had caused NONE. Judge Gloria Navarro simply defamed me in a court order and stated non-fact that was, upon my knowledge and belief, to aid and abet the Plaintiff in order to suppress my blogs, violate my First Amendment Rights, and retaliate against me.

There was no evidence whatsoever that I had a blog, or any written word in any way about or regarding to Plaintiff before I emailed him and asked for a job, because I, Defendant Crystal Cox, never had such a blog or published word. Yet Judge Gloria Navarro simply took the Plaintiff Marc Randazza's stated word and defamed me in court orders and caused me irreparable harm to me in a Preliminary Injunction, without merit, without Trademark Law actually applying and without the Adjudication of my First Amendment Rights at Issue.

Docket Entry 14, Signed by Judge Gloria Navarro Clearly shows that there was **no Hearing yet** on the matter of the Preliminary Injunction, and this ORDER clearly shows future dates of Responses by Defendant and Reply by Plaintiff, "IT IS FURTHER ORDERED that Defendants shall have until Friday, December 28th, 2012, to file their Response Brief to Plaintiffs' "Motion for Preliminary Injunction (ECF No. 2). Thereafter, Plaintiff shall have until Friday, January 4, 2012, to file their Reply Brief.

The matter shall be set for a hearing on Plaintiff's Motion for a Preliminary Injunction on Monday, January 7th, 2013, at 3:00 PM." Signed by Judge Gloria Navarro.

This suggests that there has been no decisions made, and **clearly recognizes that Defendants have a right to Respond** to the "Motion for Preliminary Injunction (ECF No. 2) and that Defendant has not yet done so, then Plaintiff, as this ORDER Clarifies, Plaintiff has a right to Reply to Defendant's Response. Yet this ORDER actually was used to SEIZE all domain names and blogs from Defendant Crystal Cox and Defendant Eliot Bernstein as if it was an ORDER To So. There is confusing information in the ORDER regarding the Seizing of the Domain Names and Blogs, yet at the end it clearly states that there will be a Response Brief, a Reply Brief, and a Hearing BEFORE this Decision is made, ruled upon.

This ORDER actually seemed to give Plaintiff some sort of power to seize massive domain names, and orders that these domain names be locked. Docket Entry 14, Signed by Judge Gloria Navarro page 11, at the bottom says the following, after listing massive amounts of blogs and domain names owned, authored by Defendant Crystal Cox and domain names owned by Defendant Eliot Bernstein, "... shall be immediately locked by Registrar and/or its successor registrar and transferred to Plaintiffs".

First of all Judge Gloria Navarro has no lawful or constitutional right to order these domain names be transferred to Plaintiff BEFORE a Response is allowed by Defendant and BEFORE a hearing on the matter, which this ORDER clearly schedules.

Secondly this ORDER, Docket Entry 14, Signed by Judge Gloria Navarro, says that "... shall be immediately locked by Registrar and/or its successor registrar and transferred to Plaintiffs", this means that Godaddy SHOULD have "Locked" the domain names before transferring and that the domain names shall remain locked for the remainder of the proceeding. Yet, to the damage of Defendant Crystal Cox and Defendant Eliot Bernstein, Godaddy Inc., unlocked the Domain Names and Transferred the Domain Names to the Plaintiff, this enabled the Plaintiff to change the Servers, and to redirect ALL the intellectual property, blog posts, domain names to ONE Blog post on the Blog of the Plaintiff, the Legal Satyricon. A blog post in which defamed Defendant Crystal Cox and linked to other articles intentionally defaming and flat out lying about Defendant Crystal Cox.

Defendant Crystal Cox's work, intellectual property, online media, thereafter linked to a page that spoke negative of Crystal Cox, defamed me and deterred my clients, lost me business, damaged my reputation, caused me to be threatened and under constant duress and ALL without any kind of Due Process or Constitutional rights adjudicated by "this court", aKa, Judge Gloria Navarro.

In most cases where the Constitutional rights of the Defendants are of concern, and due process is allowed, a Judge would order the Registrar to simply lock the domain names to prevent transfer while the legal dispute is going on, District of Nevada Judge Gloria Navarro has treated this differently than UDRP Rules, WIPO, or other courts I have experience with, and to the advantage of the Plaintiff, Las Vegas Attorney Marc J. Randazza, and to the detriment and irreparable damage of Defendant Crystal Cox and Defendant Eliot Bernstein.

Godaddy simply gave the Plaintiff the Domain Names, without locking the Domain Names and the servers were changed, this enabled Plaintiff to wipe out massive amounts of blog content, online content, remove links, remove domain names and blogs from the search engines. When I, Defendant Crystal Cox complained to Godaddy, they emailed me a letter sent to them from Plaintiff Marc Randazza's Attorney, Ronald D. Green of Randazza Legal Group.

The letter directed Godaddy what to do and used Docket Entry 14, ORDER Signed by Judge Gloria Navarro as Plaintiff's right to have domain names transferred. However, this does shift liability of the matter from Godaddy to Randazza Legal Group's Ron Green, yet it does not explain why the domain names were NOT locked and the servers were allowed to be changed BEFORE due process, before Defendant's RESPONSE was heard, and BEFORE the hearing in which this ORDER is clearly setting.

After this Order, Docket Entry 14, Signed by Judge Gloria Navarro, was sent by Plaintiff Marc Randazza's Attorney, Ronald D. Green of Randazza Legal Group to Godaddy, the domain names were GIVEN to Plaintiff, the Servers were changed and this removed massive online content, links, search engine ranking and damaged the online media and intellectual property of Defendant Crystal Cox and Defendant Eliot Bernstein.

This damage is irreparable, and cannot be undone, yet was done so BEFORE a hearing regarding the "Motion for Preliminary Injunction (ECF No. 2), which by the way was filed the SAME DAY, as the Original Complaint filed by Randazza Legal Group's Ronald D. Green, on behalf of Plaintiff Marc Randazza.

Upon my Knowledge and Belief, the plan (conspiracy) was to file a lawsuit against Defendant Crystal Cox and Defendant Eliot Bernstein, then that same day file a "Motion for Preliminary Injunction", get "their judge", whom I believe acted in Criminal and Civil conspiracy with Plaintiff and the Randazza Legal Group, to simply grant a Preliminary Injunction, and seize the blogs and domain names that upset Plaintiff, that he wanted to wipe out and the online statements and media that Plaintiff Marc Randazza did not agree with or approve of. There was no Jury Demand, and this was all to be done without the due process or rights of Defendant Crystal Cox and Defendant Eliot Bernstein to even be considered. Plaintiff Marc Randazza's Attorney, Ronald D. Green of Randazza Legal Group had not even attempted to notify, email, call, or serve Defendant Crystal Cox and Defendant Eliot Bernstein, even though they clearly had Defendant Crystal Cox's email, as I was a former client of Plaintiff Marc Randazza.

I, Defendant Crystal Cox, found out about the lawsuit from blogs defaming me, and talking negative about my “actions”, when really it was simply accusations of “actions” that were in a Lawsuit / Complaint filed against me in the District of Nevada of which I was purposely not made aware of. , Defendant Crystal Cox, contacted the court and had myself served so that I could answer the Complaint and the “Motion for Preliminary Injunction”.

Upon my Knowledge and Belief, Plaintiff Marc Randazza’s Attorney, Ronald D. Green of Randazza Legal Group never planned to serve the Defendants, but only planned to SEIZE the domain names, blogs, online media of Defendant Crystal Cox, all without me even knowing that the lawsuit existed. Plaintiff Marc Randazza had filed a WIPO complaint the months prior, and knew full well that I was living in Washington State, yet the Complaint listed me as in Montana, this was to further insure that he get a Preliminary Injunction and be able to delete blogs and change online content, BEFORE I responded to the lawsuit, he did not expect me to contact the court and have myself served.

Plaintiff Marc Randazza’s Attorney, Ronald D. Green of Randazza Legal Group filed this complaint on November 28th, 2012, than bloggers, attorneys, online media “friends” of Randazza Legal Group and Plaintiff Marc Randazza, used this complaint to disgrace, humiliate, and defame Defendant Crystal Cox and Defendant Eliot Bernstein. The complaint was published, broadcast widely online, as was the WIPO decision in connection with the same non-factual allegations. That same day they filed for an Injunction to simply STEAL my blogs, domain names and forcefully SUPPRESS our First Amendment Rights.

Order, Docket Entry 14, Signed by Judge Gloria Navarro, **Footnote on Page 6 of 12 Says**, “First, the Court doubts that Defendants have acted with the requisite “good faith” This is a violation of my rights. As “this court” had performed no investigation into this matter of whether I, Defendant Crystal Cox nor Defendant Eliot Bernstein acted in Good Faith. Judge Gloria Navarro simply took Plaintiff’s word as fact and violated the rights of Defendant Crystal Cox nor Defendant Eliot Bernstein.

Judge Gloria Navarro performed No First Amendment adjudication of the named domain names or blogs, and simply took Plaintiff’s stated word as fact. And caused irreparable damage to Defendant.

In this same footnote on Page 6 of 12, Judge Gloria Navarro defames Defendant Crystal Cox in discussion of authorship and domains, and me having no rights to works of authorship, this is not fact.

Also in this same footnote on Page 6 of 12, Judge Gloria Navarro further defames Defendant Crystal Cox and thereby lumps in Defendant Eliot Bernstein who had nothing to do with the domain name MarcRandazza.me. Judge Gloria Navarro discusses a domain name that I offered for sale for 5 Million and that I only offered the domain name and not my “lawful exploitation of work”, I assume this to say that Judge Gloria Navarro says I offered a domain

name for 5 Million Dollars for sale, and did not offer the blog or words attached to the domain name and therefore I did not act in “good faith” according to “this court” which in this ruling is Judge Gloria Navarro. However, First of All, I did not Offer MarcRandazza.me to Plaintiff for any price whatsoever.

I posted a Joke on my blog, with the title here Kitty Kitty, making fun of the domain name MarcRandazza.me and the WIPO complaints and the massive spectacle Marc Randazza was making over domain names that he had not bought himself as a domain name expert (MarcRandazza.com) and making fun of a First Amendment Attorney trying to FORCEFULLY take away my First Amendment Rights. I made a joke of Selling it for \$5 Million, however, I, Defendant Crystal Cox, have every right to sell any domain name for any price I want to, yet Judge Gloria Navarro makes this seem unlawful somehow and uses this as yet another reason to say I acted in “bad faith”.

SECONDLY MarcRandazza.me never, EVER had any content, any “exploitation of work”. MarcRandazza.me was parked at Godaddy as the register shows and Godaddy placed ads on the domain name MarcRandazza.me. I, Defendant Crystal Cox never published anything on that domain name, yet Upon my Knowledge and Belief, Judge Gloria Navarro has the power to state this as fact, just because she favors the Plaintiff and takes his word over mine.

Plaintiff Marc Randazza acted in “bad faith” in filing an 840 Trademark Lawsuit against Investigative Blogger Crystal Cox just because he does not like me, does not agree with me and wants my domain name names and online content. Plaintiff Marc Randazza acted in “bad faith” filing a Trademark Lawsuit and a WIPO complaint knowing full well that he had no Trademark, and therefore, as a Trademark Attorney himself, knowing he had not trademark, Plaintiff Marc Randazza is the one that acted in bad faith.

Yet, Judge Gloria Navarro, with no proof, and only the word of Plaintiff Marc Randazza, ruined my life, ruined my hard work and assets, violated my rights, incited hate against me, defamed me and harmed me and my business irreparably. Just because Gloria M. Navarro is a Federal Judge, that does not give Judge Gloria Navarro the legal and constitutional right to RUIN my LIFE just because a Las Vegas Attorney does not like me, and she favors him and his rights over mine, regardless of the proof, the law and the constitutional rights of the defendant.

Plaintiff Marc Randazza should not have special rights and privileges because he is an Attorney. Plaintiff Marc Randazza should not have greater First Amendment rights than those he sues.

Keep in mind that Judge Gloria Navarro has ruled this way for this Plaintiff and Attorney before, in order to help their clients seize intellectual property BEFORE the First Amendment Adjudication process of the issue at hand, such as the ViaView case. Judge Gloria Navarro stated in Randazza v. Cox and in other cases in favor of this same Law firm that there is a “Likelihood of Success of Merits”.

Judge Gloria Navarro SHOULD be investigated for her repeat actions for this same Attorney, especially actions that are "extraordinary".

Judge Gloria Navarro ruled that Plaintiff had a "Likelihood of Success of Merits" on six causes of action, yet Plaintiff had no Trademark, no proof of this "Likelihood of Success of Merits", and yet, Judge Gloria Navarro used this to defame Defendant Crystal Cox in this ORDER scheduling a hearing and later in the actual **GRANTING of the Preliminary injunction**, keep in mind that as of this hearing scheduling, my Domain Names were seized, blogs deleted, online content removed, and NOT after the GRANTING of the "Motion for Preliminary Injunction". This is a violation of my rights, and to prevent this from happening to future victims of Randazza Legal Group, in what looks to be criminal and civil conspiracy with Judge Gloria Navarro, I request this court, investigate this serious situation. As this is not just about some free blogs, or a few domain names, nor is it about the intellectual property and duress of one person, Defendant Crystal Cox. I believe they have done this before and there is HUGE money at stake. Judge Gloria Navarro has frozen accounts to make sure that Randazza Legal Group gets paid, such as in the Righthaven cases, she has given Preliminary Injunctions before in this same manner such as the ViaView case and probably others. I want to protect future victims of what looks to be an ongoing scheme.

On top of that Plaintiff asks for \$100,000 for each domain name, each blog that he states is infringing on a Trademark that he does not have. For this case that is around 3 Million Plus they are asking for around \$10,000 a month in Attorney Fees. This is a serious Racketeering Business, the way I see it and I want to protect future victims by having Randazza Legal Group and Judge Gloria Navarro Investigated by the Attorney General, the Department of Justice and the Ninth Circuit Judicial Review Board.

Regarding Ruling, Docket Entry 14, Judge Gloria Navarro **did not give me an opportunity to be available by phone for this hearing**, and therefore discriminated against my rights. At this January 7th, 2013 hearing, Judge Gloria Navarro ruled to Grant the Preliminary Injunction, by this time, I, Defendant Crystal Cox had filed my objection and was not heard, nor given my constitutional right of First Amendment Adjudication. The domain names had already been redirected, damage to my online media already done, damage to my life and career already done, blogs deleted and Plaintiff used the ORDER for the hearing scheduling as a way to Publicly Disgrace me in blog posts titled SEIZED from Crystal Cox. Other bloggers such as Tracy Coenan did the same thing. All without my rights of due process or constitutional rights being a factor or even a consideration.

Also At this January 7th, 2013 hearing, Judge Gloria Navarro ruled that, Defendant Crystal Cox's Motion for Judges and Clerks to Sign a Conflict of Interest Disclosure was DENIED; Defendant Crystal Cox's Motion Requesting the Recusal, Removal of District Judge was DENIED; Plaintiff's Motion for Preliminary Injunction is GRANTED. "Mr. Green shall file a proposed order consistent with the Court's ruling."

Upon my Knowledge and Belief, Injunctive Relief in this case was unconstitutional and has caused me, Defendant Crystal Cox irreparable harm. Judge Gloria Navarro has blocked my right to due process in order to favor Plaintiff Marc J. Randazza, a Las Vegas Attorney. The First Amendment of The Constitution of the United States should not apply to Plaintiff Marc Randazza and NOT Defendant Crystal Cox nor Defendant Eliot Bernstein.

Upon my Knowledge and Belief, Judge Gloria Navarro ruled outside of the law and outside of the constitutional rights of Defendant Crystal Cox and Defendant Eliot Bernstein

Plaintiff, Marc Randazza, admittedly has no Trademark. Even if he did, the First Amendment Trumps Trademark in the case of all these blogs and domain names that Defendant Crystal Cox was using to parody Plaintiff, make fun of Plaintiff, criticize Plaintiff, report on Plaintiff, review Plaintiff and his Law Firm, and exercise her First Amendment Rights.

There are massive amounts of cases that support Crystal Cox's Defense in all these issues at stake, many such documents were by the Plaintiff himself, yet he acts hypocritical in this case Randazza V. Cox and Judge Gloria Navarro seems to aid and abet his actions, as to my knowledge and belief of the situation.

Document 75 of District of Nevada Case 2:12-cv-02040-GMN-PAL, Motion for Summary Judgement Filed by Plaintiff's Attorney Ronald D. Green Jr. of Randazza Legal Group, against Defendant Crystal Cox, filed on 2-12-2013, page 14 line 16 through 17, says, **"While Plaintiff Randazza does not possess a registered trademark in his personal name, "MARC J. RANDAZZA"**, proving Plaintiff knew all along he had no Trademark, yet committed fraud on the courts, fraud on WIPO, wasted the court's time and money, and ruined the life, quality of life and business of his intended target, Defendant Crystal Cox.

Judge Gloria Navarro on page 4 of 12 of Document 14, dated, 12/14/2012 at the bottom Says. **"Injunctive relief [is] an extraordinary remedy** that may only be awarded upon clear showing that plaintiff is entitled to such relief" .. "Above all, a temporary restraining order "should be restricted to serving [its] underlying purpose of preserving status quo and preventing irreparable harm .."

Yet in Randazza vs. Cox, There was no clear showing that Plaintiff would Prevail or was Entitled to this relief. There was no Jury Demand, so the only deciding factor to my fate was Judge Gloria Navarro. This Preliminary Injunction did NOT preserve the Status Quo, instead it deleted massive content, removed blogs, changed servers, redirected link and all my work redirected to a blog post on Opposing Counsel's blog attack me, defaming me and inciting hate against me. Judge Gloria Navarro did in FACT cause massive irreparable harm to Defendant Crystal Cox and Defendant Eliot Bernstein and seems to have no accountability, therefore I am asking for an investigation into these rulings, these matters, these actions directly favoring this Plaintiff, this Law Firm.

Judge Gloria Navarro, District of Nevada, provides this “extraordinary” remedy to this Plaintiff again and again, and to the detriment and irreparable harm of the Defendants. I, Pro Se Litigant Crystal Cox ask for this to be investigated.

Document 14, dated, 12/14/2012 was an ORDER signed by Judge Gloria Navarro in which issued a hearing notice for a Preliminary Injunction. Yet this document was used as an ORDER Granting a Preliminary Injunction and Violated the Rights of Defendant Crystal Cox and Defendant Eliot Bernstein.

Upon my Knowledge and Belief, Judge Gloria Navarro simply took the Plaintiff Marc Randazza’s stated word and this was used against me, Defendant Crystal Cox and Defendant Eliot Bernstein, in violation of our Constitutional Rights and without Due Process of Law afforded to me or to Defendant Eliot Bernstein. This should not be tolerated in a court of the United States, I OBJECT to the violation of due process and violation of my constitutional rights in ORDER Entry 14 of District of Nevada Case 2:12-cv-02040-GMN-PAL. And I ask that Judge Gloria Navarro be investigated for her actions, in hopes of saving innocent victims of this scheme in the future and of warning the Public at Large.

Regarding the Details of Docket Entry 41, Judge Gloria M. Navarro Ruling Granting Preliminary Injunction to Plaintiff.

I, Defendant / Pro Se Litigant / Complainant Crystal Cox, Re-Allege all of the preceding paragraphs.

In **Docket Entry 41, ORDER**, Judge Gloria Navarro GRANTED a Preliminary Injunction, however, the Domain Names and blogs had already been SEIZED before, I Pro Se Defendant Crystal Cox had a chance to respond to any of the allegations, as noted in the Order of Document 14.

It is not “standard of practice” to direct a domain name registrar to transfer domain names that have not had a fair trial, or due process. The domain names in dispute are generally, locked as they are, to preserve status quo and are not turned over to the Plaintiff, the demanding party simply because they said so. It is my belief that Judge Gloria Navarro has acted outside of the law in order to aid and abet the ‘agenda’ of Las Vegas Attorney, Plaintiff, Marc Randazza.

The Plaintiff was NOT lawfully, constitutional entitled to a Preliminary Injunction, as per the preceding reasons stated by Defendant / Pro Se Litigant / Complainant Crystal Cox, yet Judge Gloria Navarro GRANTED Plaintiff a Preliminary Injunction, in which did in FACT cause irreparable harm and destroy any chance of “status quo”.

I, Defendant / Pro Se Litigant / Complainant Crystal Cox, did NOT use the Domain Names commercially, Plaintiff never proved that I did, yet Judge Gloria Navarro claims I have no right to register a domain with a person's name in it and simply grants Preliminary Injunction. I Provided this court, Judge Gloria Navarro with information proving the opposite defense, even cases such as GlenBeckRapedandMurderedAYoungGirlIn1990.com, a case in which Plaintiff Marc Randazza Defended the Domain Name owner of that name and his right to own that Domain Name, and he won. I gave Judge Gloria Navarro supporting documentation and evidence and my rights were blocked, denied, and my intellectual property destroyed, reputation irreparably harmed, and my quality of life severely damaged.

In **Docket Entry 41, ORDER**, Judge Gloria Navarro discusses that Page 7, Line 24, "Given the fact that the **Defendant has been shown to have engaged in a pattern of cybersquatting and cyber-extortion**, this Court finds that she was more likely than not, attempting to sell this domain name to the plaintiff, or to solicit a price for the domain names in excess of her out of pocket expenses related to the domain name."

Judge Gloria Navarro has no right to RULE on matters of other alleged victims, patterns of cybersquatting, cyber-extortion and domain name solicitations which are no part of this case, are not material facts of this case and are simply something that the Plaintiff ALLEGED that I, Defendant Crystal Cox, did, in which I am not guilty of nor have I had due process of law on those allegations. Upon my knowledge and belief Judge Gloria Navarro has used this motion to further defame me, make me look like a criminal, and ruin my life and business, knowing full well that Plaintiff and Co-Conspirators will see this document, and that it will affect my future business and reputation. All without my due process of law.

I, Defendant / Pro Se Litigant / Complainant Crystal Cox have not engaged in a pattern of cybersquatting and cyber-extortion nor been convicted of such. I have NEVER done this, nor been given a trial or due process on this ACCUSATION. Yet Judge Gloria Navarro flat out says I am guilty of this "**pattern**", which is criminal, based on the LIE of Opposing Counsel, the Plaintiff who himself is an attorney, and DOES know the domain name business.

Judge Gloria Navarro does not have an understanding of Domain Names, and should have sought outside expertise, instead of simply taking the Plaintiff's word on the issue. Judge Gloria Navarro says, "**this Court finds that she was more likely than not, attempting to sell this domain name to the plaintiff, or to solicit a price for the domain names in excess of her out of pocket expenses related to the domain name**" First of all Domainers do this every hour of every day, of every week and have for decades. I have been to trade shows and followed the domain name business for over a decade. I have every legal right to buy a domain name for \$10 or 10 Million Dollars and re-sell that domain name for whatever price I want to. That is done everyday in the domain name market and has nothing to do with out of pocket expense. Domain Names are the Real Estate of the Internet. For Judge Gloria Navarro to use this as a reason to cause me irreparable harm, is unlawful and unconstitutional.

Judge Gloria Navarro seems to be saying that she is just going to GIVE the Plaintiff the domain names he wants, to prevent me from selling them to him or anyone else, that is unlawful and unconstitutional.

Judge Gloria Navarro claims on page 7 that I offered to sell MarcRandazza.me to Plaintiff for 5 Million Dollars, that is NOT True, I made a joke on my blog to the public and NOT to the Plaintiff. The Plaintiff offered to buy MarcRandazza.com from me at one point and, as the record shows I said it was not for sale at ANY price. Judge Gloria Navarro is defaming me in this ORDER and accusing me of things I have not DONE nor been given due process of law on those allegations. Judge Gloria Navarro has no right to ruin me, defame me, harass me based on the word of ONE MAN, the Plaintiff.

I, Defendant / Pro Se Litigant / Complainant Crystal Cox did not buy MarcRandazza.me with intend to profit from reputation services, that is a flat out falsehood, and just because it comes from a judge does not make it TRUE or Lawful. This is a violation of my rights.

I, Defendant / Pro Se Litigant / Complainant Crystal Cox have every right to ask for Judge Gloria Navarro to be removed from my case yet in this ORDER she AGAIN rules that I have no right to ask her to sign a Conflict of Interest Request and no right to have her removed from my case. This is unlawful and unconstitutional.

I, Defendant / Pro Se Litigant / Complainant Crystal Cox ask for there to be a full investigation as to the lawful right of all domain names in this case, including the domain names in the WIPO dispute be investigated as this is an issue of massive public concern when Plaintiff wishes \$100,000 per domain and per blog, and has District of Nevada judges rule on matters to pay these attorneys after they violate the defendants rights.

I OBJECT to the violation of due process and violation of my constitutional rights in ORDER Entry 41 of District of Nevada Case 2:12-cv-02040-GMN-PAL. And I ask that Judge Gloria Navarro be investigated for her actions, in hopes of saving innocent victims of this scheme in the future and of warning the Public at Large.

Pro Se Defendant in this case, Crystal Cox filed several requests for Judge Gloria Navarro to sign a Conflict of Interest Disclosure, assuring Pro Se Defendant that she had no conflicts or financial connection with the Plaintiff, Marc Randazza, his Law Firm Randazza Legal Group, Ronald D. Green his acting Attorney formerly of Greenberg Traurig,

I, Defendant / Pro Se Litigant / Complainant Crystal Cox am an investigative blogger and I get tips on important issues related to the Plaintiff. I filed a motion to investigate, bringing to the attention of Judge Gloria Navarro matters of serious public concern and asked for her to notify authorities on this matters, Judge Gloria Navarro DENIED this motion, struck it from the record, and though it is the lawful duty of Judge Gloria Navarro to notify the proper authorities on suspected criminal activity, she refuses this obligation, duty even at the request of a Pro Se Litigant who fully believes that peoples lives and livelihoods are in danger.

An Examination of the Details of Docket Entry 89, Judge Gloria M. Navarro Ruling Granting Plaintiff's Motion to Strike Pro Se Defendant Crystal Cox's Complaint Answer.

Docket Entry 48 was in part a Motion to Strike Defendant Crystal Cox's Answer to the Complaint. I, Pro Se Litigant Crystal Cox had mailed my complaint answer in to the courts and it was put on the Docket on January 3rd, 2013. Docket Entry 23. **Docket Entry 89**, is a Motion Signed by Judge Gloria Navarro Granting Plaintiff's Motion to STRIKE My Complaint Answer.

Judge Gloria Navarro ORDERED that I, Pro Se Litigant Crystal Cox file an Amended Answer, and that I stick to the allegations, the causes that Plaintiff has alleged. This tied my hands as to a defense in many ways, as the Plaintiff accused me of Civil Conspiracy, and my response addressing those issues in detail, and objecting to the Trademark issues as Plaintiff DOES not Have a Trademark.

In Document 89, COURT Order Signed by Judge Gloria Navarro, Page 4 Line 13 to 17, Judge Gloria Navarro Says, ""Specifically, when answering a complaint, defendants must (1) "state in short and plain terms its defenses to each claim asserted against it"; and (2) "admit or deny the allegations asserted against it by an opposing party." Fed. R. Civ. P. 8(b)(1)." AND

"In this case, Defendant's answer merely states that she denies "all counts of Complaint." (Answer, ECF No. 23.) Defendant fails to actually address the claims asserted in the Plaintiffs' Complaint."

I, Pro Se Litigant Crystal Cox did deny all claims, as Judge Gloria M. Navarro admits here, in saying that Defendant's answer denies "all counts of the Complaint". I Pro Se Defendant did DENY all Claims of the Complaint. And therefore did "actually address" the claims. And as for Claim number 6, Civil Conspiracy, I addressed this Claim in detail best I could as a Pro Se Litigant.

Document 89, line 15-17 Judge Gloria Navarro Says, "Instead, the statements in Defendant's Answer relate to accusations of conspiracies against her. Furthermore, these other issues are not relevant to the allegations of cybersquatting and related allegations that are included in Plaintiffs' Complaint."

It is my Opinion and belief that in this statement Judge Gloria Navarro shows her deliberate attempt to sabotage me, Pro Se Litigant Crystal Cox, to BLOCK my rights of due process, silence me, tie my hands, violate my constitutional rights and take away my rights of due process.

Judge Gloria Navarro has erred in saying "Furthermore, these other issues are not relevant to the allegations of cybersquatting and related allegations that are included in Plaintiffs' Complaint". I, Pro Se Litigant Crystal Cox did not engage in cybersquatting, I denied this allegation, for I did not violate this law.

My complaint answer CERTAINLY did address the allegation in the complaint and the reason as to why the Plaintiff filed the harassing SLAPP suit against me, and I thoroughly addressed Cause Six, which is an "allegation" of civil conspiracy. My complaint answer should not have been stricken and I should not have been forced by court order to only answer cybersquatting and other allegations not related to "conspiracy" as I was being ACCUSED of conspiracy by Plaintiff in the Complaint.

My Complaint answer was changed under duress and threat of a Default Judgement, which would be over 3 Million Dollars and further RUIN my Life. Therefore I am filing THIS Amended complaint answer to further explain my side of the story, my DEFENSE.

Judge Gloria Navarro SAID, "Instead, the statements in Defendant's Answer relate to accusations of conspiracies against her"

Judge Gloria Navarro as acted outside of the law in stating this, and she has ERRED, in my opinion, flat out lied to defend, favor, stand up for her Co-Conspirator Plaintiff Marc Randazza.

I, Pro Se Litigant Crystal Cox / Pro Se Defendant was accused of "Conspiracy" as Cause of Action SIX clearly states, my Complaint Answer is Denied and I am told to amend the complaint and not to "relate to accusations of conspiracies", even though I was ACCUSED of Conspiracy. This is unlawful, a violation of my rights and unconstitutional.

I, Pro Se Litigant Crystal Cox ask for an investigation into this case and all cases connected to Randazza Legal Group, Ronald D. Green Formerly of Greenberg Traurig, J. Malcom Devoy of Randazza Legal Group and Marc J. Randazza owner of Randazza Legal Group.

Judge Gloria Navarro pressured me to answer the complaint the way she wanted it answered and to NOT address the alleged "conspiracy", this is unconstitutional. Judge Gloria Navarro pressured me by threat of, if I did not amend my complaint and under her guidelines I would get a Default Judgement, this is unconstitutional.

Judge Gloria Navarro BLOCKED my true answer and pushed me to answer in a specific way outside of the "conspiracy" by ruling in a court ORDER, that I DO NOT "Answer relate to accusations of conspiracies against her" Another words, at the court ORDER of Judge Gloria Navarro, I, Pro Se Litigant Crystal Cox am not to address the conspiracy against me in my defense of Cause of Action Six, accusing me of Civil Conspiracy.

Judge Gloria Navarro accuses my complaint answer of being improper, as per the body of page 4, if I do not stick to allegations of "cybersquatting" when clearly I was ACCUSED of CIVIL CONSPIRACY as well.

On page 5 Judge Gloria Navarro says that In filing an amendment to my Counterclaim I used up my one pleading, "Rule 15(a)", "a party may amend its pleading once as a matter of course" Judge Gloria Navarro says I exhausted this opportunity when I filed an amended Counterclaim.

I, Pro Se Litigant Crystal Cox believe that Judge Gloria Navarro deliberately erred in this ruling as I did not exhaust my "opportunity" at amending my complaint answer by amending a counterclaim, they are to VERY different motions, filings, documents. Judge Gloria Navarro goes on to say that to file an amended complaint answer I, Pro Se Litigant Crystal Cox need permission from the Plaintiff or a court ORDER, yet I never asked to amend the complaint answer.

And even if this is true, Judge Gloria Navarro struck my countercomplaint in this case, so don't I get another "opportunity" at amending SOMETHING?

I, Pro Se Litigant Crystal Cox did file my amended complaint answer and removed all that may incriminate Plaintiff or Judge Gloria Navarro to the best of my ability, I did this under duress as the ORDER says if I did not do as the ORDER ruled, I would be subject to a Default Judgement, and at this point in time that would be \$3 Million Dollars and approx. \$35,000 in attorney fees to the Plaintiff.

Upon my knowledge and belief, Judge Gloria Navarro striking my Complaint answer and forcing the conspiracy issue out of my complaint answer, along with striking my countercomplaint regarding the issue of conspiracy in which I was accused of by Plaintiff, was a deliberate and intentional act to cause me irreparable harm, defame me, harass and intimidate me in favor of Plaintiff and Co-Conspirators.

Docket Entry 48 was also in part a Motion Plaintiff filed to Strike my Counter Complaint. Docket Entry 89 was also a RULING / ORDER Granting this motion to Strike my Amended Complaint.

In Document 89, COURT Order Signed by Judge Gloria Navarro Granted a Motion to Strike My Counterclaim. I, Pro Se Litigant Crystal Cox believe that Judge Gloria Navarro acted unconstitutionally and outside of the law and my rights of due process in striking my counterclaim which was related to the accusations of cyberstalking, cyber-extortion, extortion, and civil conspiracy.

Upon my knowledge and belief, Judge Gloria Navarro removed evidence of my countercomplaint because I, Pro Se Counter Plaintiff named her as a Counter Defendant and because I named large amounts of media and tech companies involved with the Plaintiff in this conspiracy against me, which I FULLY believe to be true.

Upon my knowledge and belief, Judge Gloria Navarro had no lawful or constitutional right to simply strike my complaint answer from the record and DENY me a right to amend the complaint vs striking the complaint from the record and removing it from Pacer.

Judge Gloria Navarro ordered me to file a new complaint, as a separate lawsuit, though I, Pro Se Litigant Crystal Cox fully believe that Judge Gloria Navarro did not expect me to do so, as she knew I was trying to file in Forma Pauperis and could not afford to print and mail in a new complaint nor pay the \$350 Filing Fee.

Judge Gloria Navarro IGNORED ruling on my motion to continue in Forma Pauperis in order to protect ALL counter-defendants from being served by the Marshal, which I have every right to, as a matter of law.

Judge Gloria Navarro granted a motion to strike a counter complaint in which was FILED after one of the counter defendants, Roxanne Grinage accepted service on the Complaint.

Upon my knowledge and belief, Plaintiff Marc Randazza had not bothered to answer the counterclaim filed by Pro Se Counter Plaintiff Crystal Cox on January 3rd 2013 because he knew it would be dismissed, stricken.

Plaintiff Marc Randazza, should have had a default judgement against him, however he must have known that Judge Gloria Navarro would get him out of it, as he did not answer and instead Plaintiff filed a motion to Strike Defendant / Counter Plaintiffs counterclaim.

Counter Defendant Roxanne Grinage accepted service on January 14th, 2013, and she certified that she mailed this "NOTICE OF APPEARANCE AND CERTIFICATE OF SERVICE" to the District of Nevada Courts, Judge Gloria Navarro's Court . This NEVER made it onto the Court Docket. 3 days Later on January 17th Plaintiff filed a motion to Strike Pro Se Defendant Crystal Cox's Counter complaint.

Roxanne Grinage posted on her blog that this case was about to come to a close and that Crystal Cox had not served "us" properly so the case would soon be over. This was after she accepted service of the Complaint, and after she blogged about talking to Plaintiff Marc Randazza.

I, Pro Se Counter Plaintiff Crystal Cox even put the Roxanne Grinage acceptance of service on the docket as an exhibit, and still it was NOT acknowledged by Judge Gloria Navarro as "accepted service".

The DOCKET in this case changed often, that is why I made a copy of the Docket every time I filed a motion. There was no reason given to me as to why my descriptions of Exhibits was removed. I assume it was because the Plaintiff is an Attorney and did not want his Peers to know what the Exhibit was unless they paid to click and view, which few would do.

I was not notified as to why my Exhibit descriptions were constantly changed and removed from the Docket, it was as if the Plaintiff had private meetings with Judge Gloria Navarro discussing my descriptions of Exhibits on the Docket, and they agreed privately to simply make the changes and not give me a reason why. If I made a mistake, it is Judge Gloria Navarro's duty to notify me so I can do better in the future.

I was never notified. Having been Pro Se before, it was a notable difference to me, as in my Oregon Federal Court Case, when I emailed or mailed in documents, the court clerk put in a detailed description of the exhibit, so in my Nevada case, I did the same thing and my descriptions were removed. There was no consistent code, or standard on how the Exhibit descriptions were to be put into the Electronic system. If there was to only be a one letter or one number description then why does Pacer allow for more? Leads me to believe Plaintiff had special treatment on the docket and had my detailed descriptions removed.

In Document 89, COURT Order Signed by Judge Gloria Navarro said, "Rule 8 of the Federal Rules of Civil Procedure requires that a proper pleading that states a claim for relief must contain "a short and plain statement of the claim showing that the pleader is entitled to relief." "In contrast to the short and plain statement requirement of Rule 8, Defendant's Amended Counter Complaint is replete with irrelevant material, inappropriate commentary, baseless speculation, and derogatory statements none of which relate to Plaintiff's Complaint. (ECF No. 62) For this reason alone, Defendant's Amended Counter Complaint must be stricken."

Plaintiff accused me Defendant Crystal Cox of Civil Conspiracy, Conspiracy is a HUGE allegation. There is no short and plain defense to the allegation of civil conspiracy, especially when I was trying to prove to the court that the Plaintiff is the one acting in Civil Conspiracy and NOT ME, Pro Se Defendant Crystal L. Cox.

Plaintiff's complaint was filled with lies as was Plaintiff's Motion to strike my complaint answer, their motion for summary judgement and all of their motions. Plaintiff called me a criminal, defamed me, violated my rights, made inappropriate commentary, made baseless speculation, and a constant barrage of slamming and derogatory statements, and Plaintiff's motions were FILLED with irrelevant material, yet, because the Plaintiff is an Attorney, upon my knowledge and belief, Judge Gloria Navarro she takes his words as truth and accuses my words of being speculative, derogatory, irrelevant, inappropriate, baseless and unrelated.

I, Pro Se Counter Plaintiff Crystal Cox may not be a Judge, and I may not be an attorney, I may not know how to say all this perfectly, but I am telling the TRUTH and this Attorney is LYING. I am doing the best I can to do defend myself and the Public at Large from this Plaintiff. Judge Gloria Navarro has slammed me, violated my rights, defamed me, put my life in danger, issued unconstitutional rulings, blocked my right to due process and I am not a criminal, I am not the "bad guy". I am an investigative blogger, trying to expose corruption and make this world a better place. Plaintiff really did do the things I have claimed, and I really DID not do what he alleges I did.

Judge Gloria Navarro has not done an investigation, has not given me due process or even acknowledged my proof, instead, Judge Gloria Navarro has simply took the word of the Plaintiff as Fact, and his evidence of blogs of his co-conspirators as "Legal Commentary" and proof against me, when it's not fact, but simply the blog of his buddies.

Judge Gloria Navarro Says, "Defendant's Counter Complaint must also be stricken because it is an impermissible third-party complaint." however, it is not third party, it is connected to the Plaintiff, to his Attorney, to his clients, and I as trying to show that, and Judge Gloria Navarro simply strikes my counterclaims from the record.

In Document 89, COURT Order Signed by Judge Gloria Navarro, Judge Gloria Navarro Says, "Rule 14(a) of the Federal Rules of Civil Procedure limits any civil defendant's ability to assert claims against parties that were not originally named in the underlying complaint." **I was accused of civil conspiracy**, I had to show that Plaintiff is acting in conspiracy and that the reason Plaintiff brought this legal action was and is in conspiracy with all of those "related" counter defendants.

In Document 89, COURT Order Signed by Judge Gloria Navarro, Judge Gloria Navarro Says, "However, these allegations are unrelated to the underlying cybersquatting claims in Plaintiffs' original complaint. Defendant may assert the claims raised in her Counter Complaint as a separate and distinct independent Complaint by filing and initiating a new unrelated case."

The alleged counter defendants are co-conspirators and reasons that Plaintiff has accused me of cybersquatting of which I am NOT guilty of. And my allegations in my counter claim are **NOT unrelated** to the issues in the complaint, however I did file a new and separate lawsuit. However, it is IMPOSSIBLE to be fully unrelated to this case as the conspirators are connected.

As an Investigative Blogger, trying to fight corruption in the US courts, I feel it is my duty to report Judge Gloria Navarro and ask for an investigation into this matter in order to protect the public at large.

Upon my knowledge and belief, Judge Gloria Navarro striking my Complaint answer and forcing the conspiracy issue out of my complaint answer, along with striking my counter complaint regarding the issue of conspiracy in which I was accused of by Plaintiff, was a deliberate and intentional act to cause me irreparable harm, defame me, harass and intimidate me in favor of Plaintiff and Co-Conspirators.

In One Judicial ORDER, Document 89, Judge Gloria Navarro removes my complaint answer, orders me to re-file her specific way, and BLOCKS my right to a counterclaim which violates my constitutional rights and I believe violates the law.

Judge Gloria Navarro has ignored my Motion for a Protective Order. Plaintiff and co-conspirators have threatened me and my sources, I have provided Judge Gloria Navarro proof of this and though Judge Gloria Navarro grants a Protective Order to protect the Randazza Family from domain names, Judge Gloria Navarro ignores my quality of life, my safety, what Plaintiff is doing to ruin my life and business, threaten me, harass me, intimidate me, stalk me, and harass my sources / whistleblowers that give me tips and witnesses in my cases such as Monica Foster aKa Alexandria Melody and Stephanie DeYoung Oregon CPA and Bankruptcy Whistleblower, whom Marc Randazzza has information on his blog that she authored years ago, it was not accurate, and she asked him to RETRACT her words from his blogs, that he got from one of the co-conspirators, he has refused. And at that time as the record shows Plaintiff Marc Randazzza tried to get CPA / Whistleblower Stephanie DeYoung to conspire against Crystal L. Cox, Investigative Blogger.

Recently Plaintiff Marc Randazza, even though he has an attorney from his law firm acting as his attorney, he contacted Stephanie DeYoung to schedule a deposition in this very case. He threatened her with a subpoena and pried into my private life, all under the guise of "this case" against Crystal Cox, when he is not his own attorney in this case and has no legal right to harass witnesses.

Judge Gloria Navarro knows ALL of this and does nothing about it. I, Defendant / Pro Se Litigant / Complainant Crystal Cox even filed a Motion to Sanction Attorney Plaintiff Marc Randazza and his Attorney Ronald D. Green, in order to bring these massively important issues to the court's attention and I was IGNORED.

These Co-Conspirators have defamed me with actual malice, endangered my life, ruined my real estate career, cost me money time and hardship, and kept me in constant duress and all because I was reporting on their activities and posting tips send into me, the main goal being to remove my blogs and to silence me speaking out about Plaintiff Marc Randazza and reporting on the biggest technology theft in the world, the iViewit Technology theft. This is a Technology worth 13 Trillion Dollars and co-conspirators will stop at nothing to silence me, Investigative Blogger Crystal Cox. I feel it my duty to report these people, companies, judges, attorneys, before one of them follow through on their threats and actually kill me.

I, Defendant / Pro Se Litigant / Complainant Crystal Cox, filed a Notice of Emergency Protection from the courts regarding Co-Conspirators I had named, I gave Judge Gloria Navarro information on the dangers of these men connected to the Porn Industry and how they had threatened me and my sources, Judge Gloria Navarro completely IGNORED this emergency request for a Protection Order.

This lawsuit is about Plaintiff's' campaign of bad faith harassment against a blogger that he does not like and with whom he does not agree with. This lawsuit is about Plaintiff's' campaign of bad faith harassment against Blogger Crystal Cox, whom he once negotiated as her attorney in matters that he discusses in this legal action, Obsidian V. Cox. This lawsuit is about Plaintiff's' campaign of bad faith harassment a Las Vegas attorney seeking favoritism from a Las Vegas Judge in order to take away the constitutional rights, intellectual property and online content of a blogger that he has a personal issue with and a personal vendetta against. Plaintiff Marc Randazza has used this court, and his connections to Judge Gloria Navarro to violated the lawful and constitutional rights of Defendant Crystal Cox and Defendant Eliot Bernstein.

Professional, Seasoned Attorneys, as the Plaintiff is and his Attorney are, know that they were acting outside of the law and outside of my constitutional rights. They know I had no blog about a 4 year old and simply said I did and were believed because they are attorneys and I, Pro Se Litigant Crystal Cox have no rights in this court of Judge Gloria Navarro. I never harassed Plaintiff's daughter, he flat out lied about this to get public sympathy and to further defame and attack me, Defendant Crystal Cox.

Professional, Seasoned Attorneys, as the Plaintiff is and his Attorney are, know that all the claims they raised in this lawsuit are based on a Trademark that they do not have.

Document 75 of District of Nevada Case 2:12-cv-02040-GMN-PAL, Motion for Summary Judgement Filed by Plaintiff's Attorney Ronald D. Green Jr. of Randazza Legal Group, against Defendant Crystal Cox, filed on 2-12-2013, page 14 line 16 through 17, says, **"While Plaintiff Randazza does not possess a registered trademark in his personal name, "MARC J. RANDAZZA"**, proving Plaintiff knew all along he had no Trademark, yet committed fraud on the courts, fraud on WIPO, wasted the court's time and money, and ruined the life, quality of life and business of his intended target, Defendant Crystal Cox.

" 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."

Plaintiff Marc Randazza, and his attorney Ronald Green simply make "Statement of Relevant Facts" that are flat out defamatory lies and they are protected by "this court", Judge Gloria Navarro to do so, with no factual evidence or proof of these alleged, Statement of Relevant Facts".

Judge Gloria Navarro seems to agree with Plaintiff on all of my, alleged victims, and punishes me with her RULINGS, denial of rights, Stricken Documents, and a Preliminary Injunction that completely violated ALL of my legal and constitutional rights. This court has no legal right to address all of these "alleged" victims, as this is not a material fact of this case. And as to Judge Gloria Navarro having the opinion that they are victims, this is from the stated word of the Plaintiff, and from other blogs, she called "Legal Commentary" which are friends of and connections to the Plaintiff. The alleged "victims" are simply subjects of my online reporting, whistleblowing and media and are NOT victims.

Plaintiff quotes Peter Michaelson WIPO Panelist in his Summary Judgement and other motions in order to deny my rights, yet Peter Michaelson WIPO Panelist had massive conflicts of interest and is NOT a court of law. Peter Michaelson WIPO Panelist accused Defendant Crystal Cox and Defendant Eliot Bernstein of the crime of Extortion as if he was a Judge and Jury, and with no trial, no criminal processing of any kind. Yet Judge Gloria Navarro seems to have taken this as fact, because it is WIPO and thereby instantly credible, even though it is NOT FACT, and is Defamation with actual knowledge of it being untrue.

Plaintiff Attorney Marc Randazza, and his attorney Ronald Green RECITE quotes of the WIPO decision by Peter Michaelson WIPO Panelist, to use against me in this case. And when I recite quotes from this decision and defend myself, Peter Michaelson WIPO Panelist OBJECTS and claims it irrelevant that I quote a WIPO decision in a motion.

Judge Gloria Navarro seems to agree with Plaintiff regardless of the facts, the truth and seems to allow Plaintiff to simply lie about me, defame me, bully me, and ruin my quality of life. Yet when I fight back, Judge Gloria Navarro claims that my motion should be stricken because I say "derogatory" things about the Plaintiff. When actually I am defending what Plaintiff has said about me, falsified about me, lied about me, Defendant Crystal Cox.

Judge Gloria Navarro seems to take whatever the Plaintiff says as fact and simply deny me every possible right of defense, I Object to this, and ask that Judge Gloria Navarro be investigated so that this does not happen to future victims of Randazza Legal Group.

Plaintiff Attorney Marc Randazza, and his attorney Ronald Green should not have powers over the District of Nevada, Judge Gloria Navarro, simply because they are attorneys. Nor should they have power over WIPO simply because they are connected to Peter Michaelson WIPO Panelist, this is a violation of the lawful and constitutional rights of Crystal Cox and Eliot Bernstein, the Victims of their Defamation.

Plaintiff Attorney Marc Randazza of Randazza Legal Group, and his attorney Ronald Green of Randazza Legal Group accuse Defendant Crystal Cox of Extortion throughout every motion in this legal proceeding. Plaintiff is well known in the legal community and a member of the First Amendment Bar, he is believed over Defendant Crystal Cox, even though he has no fact or proof, nor court transcript, no criminal complaint, no trial docket, nor court docket, no prosecution proof of any kind that Defendant Crystal Cox is GUILTY of the CRIME of extortion, yet Plaintiff continues to use court documents, legal filings to defame me and accuse me of the crime of extortion of which I am not guilty of nor have I had due process on. Plaintiff Attorney Marc Randazza of Randazza Legal Group has used his instant access to the court docket and his standing as an Attorney to ruin my life, defame me, lie about me and non-stop accuse me of Criminal Activity, yet for some reason is protected by this court, Judge Gloria Navarro.

Plaintiff Attorney Marc Randazza accuses me of Extorting him, yet has no proof of this and has filed no criminal complaint, WHY? Because it is not fact, yet Plaintiff Attorney Marc Randazza continues to repeat this LIE as fact in public documents and court filings, viewable by the public.

Plaintiff Attorney Marc Randazza has intimidated and threatened my sources, whistleblowers, and witnesses in my case yet publishes in court documents that Crystal Cox has engaged in Witness Tampering, when clearly I have NOT.

I have never used a domain name to harass, intimidate or extort Plaintiff, yet he uses this court as his personal MEDIA to ruin my life and my business and incite hate and harassment against me, Pro Se Defendant Crystal Cox.

Document 75 of District of Nevada Case 2:12-cv-02040-GMN-PAL, Motion for Summary Judgement Filed by Plaintiff's Attorney Ronald D. Green Jr. of Randazza Legal Group, against Defendant Crystal Cox, filed on 2-12-2013, page 14 line 16 through 17, says, **"While Plaintiff Randazza does not possess a registered trademark in his personal name, "MARC J. RANDAZZA"**

Plaintiff Marc Randazza admits to having no Trademark, yet has been able to steal massive domain names, through WIPO and through this court, and Plaintiff Marc Randazza, has deleted blogs, redirected servers, removed online competition, incited hate, published intentional lies, violated my constitutional rights, denied me due process, caused me massive duress, and wasted taxpayers money and committed fraud on this court, and all the while, KNOWING, as a Trademark Attorney himself, that he HAD NO TRADEMARK.

Plaintiff Marc Randazza, nor his allegedly attacked "family" have a Trademark, therefore Plaintiff is simply mad at what Defendant Crystal Cox said online about him, so he sued her, deleted her blogs, removed her from the search engines for massive blogs, stole domain names and redirected them to a blog post on his own blog, the Legal Satyricon, in which defames me, and this is all protected by this court, Judge Gloria Navarro.

Yet, Plaintiff files this Frivolous, Retaliatory SLAPP Lawsuit, wasting the courts time and money and ruining the life and business of Defendant Crystal Cox

Plaintiff, filed for a Default Judgement against Defendant Eliot Bernstein for \$500,000 for 5 domain names of which Plaintiff has no right whatsoever legally or constitutionally to take, and a Default Judgement for Defendant Eliot Bernstein to pay Plaintiff's Attorney Ronald D. Green, who is an attorney at Plaintiff's Law Firm Randazza Legal Group, \$23,000 in legal fees. All this and yet knowing full way as Trademark Lawyers that Marc Randazza had not Trademark.

Plaintiff claimed to WIPO that he had a Trademark and took Domain Names he had no legal right to take, and has lied to this court over and over regarding Defendant Crystal Cox. Plaintiff should not be above the law just because he is an Attorney. Plaintiff should be punished and Defendant Crystal Cox should be given relief of the deliberate defamatory actions, intellectual property theft, life endangerment and business ruining actions of Plaintiff with actual malice and deliberate intention to harm Defendant Crystal Cox and Defendant Eliot Bernstein.

Upon my knowledge and belief, Judge Gloria Navarro striking my Complaint answer and forcing the conspiracy issue out of my complaint answer, along with striking my counter complaint regarding the issue of conspiracy in which I was accused of by Plaintiff, and Granting an unconstitutional Preliminary Injunction was a deliberate and intentional act to cause me irreparable harm, defame me, harass and intimidate me in favor of Plaintiff and Co-Conspirators.

The goal of this pattern seems to be for the attorneys to create an alternative reality online in which pressures their clients and defendants they sue, into settlements so that the Attorneys get paid. Oftentimes they file a Default Judgement and demand Attorney fees for their own time in suing unsuspecting Defendants.

An Organized Internet Mobbing made up of CPA's, Attorneys, Law Firms, Financial Bloggers Attorney Bloggers

This gang of attorneys submit each others blog post, media articles, news articles to JUDGES as evidence against their target, the Defendants they sue. Judges, such as Judge Gloria Navarro said in a RULING against Pro Se Defendant Crystal Cox, that Plaintiff Marc Randazza had submitted "Legal Commentary" therefore she took that as fact, because it was from a Blog by an Attorney or a New York Times Reporter, Forbes Reporter. Yet that was not court documents, was not proof of the allegations, it was simply one reporter / blogger trash talking another, in this case me, Pro Se Defendant Crystal Cox.

This is a huge issue to the public at large, because this gang, internet mob, can sue anyone they please and have unbelievable connected power. They are all over the country, and this helps them to create "Legal Commentary" in a way that looks like factual evidence.

Attorney Bloggers such as Defendants / Alleged Co-Conspirators Jordan Rushie and Leo Mulhill of Philly Law Blog, Kenneth P. White of Brown, White and Newhouse and of Popehat.com, Attorney Jason Jones of SaltyDroid, Eric Turkewitz, Bennett and Bennett and more, have blogs in which they promote Defendant Marc Randazza and discuss cases in the Legal Blogosphere, which in and of itself would be benign, however they slant the case to one side to get their attorney friends version of the case to look like the FACTS, and then they use these blogs postings as evidence to cause harm to, "shakedown" their Clients.

They are used to get Preliminary Injunctions in which cause massive irreparable damage and completely disregard the due process and constitutional rights of the Unsuspecting Defendants that they SUE.

These blog postings are used as "Legal Commentary", and taken as fact. Once they get their judgement, then they pressure their clients and those they sue for HUGE Attorney fees, hundred of thousands of dollars such as in the Righthaven case, involving this same Judge, Judge Gloria Navarro, freezing bank accounts so that Attorney Marc Randazza of Randazza Legal Group would get paid hundreds of thousands of dollars.

I, Pro Se Plaintiff Crystal Cox belief that Attorney (Defendant) Marc Randazza of Randazza Legal Group has acted on BOTH sides of the Righthaven Case in order to shakedown clients on both sides. I belief he is connected to Opposing Counsel and the all have agreements to pressure their clients into settlements whereby the Attorneys get HUGE Paychecks and the Victims lose domain names, blogs, competing websites (websites that compete with their Plaintiff client and Randazza simply gets a Judge to Wipe them out), reputation, business

Media Outlets such as Stephens Media - ADD Here, Kashmir Hill of Forbes (Connected with (Defendant) Marc Randazza of Randazza Legal Group through AboveTheLaw.com of which is a Client of Marc Randazza)

Many of the bloggers and media outlets that promote the cases of (Defendant) Marc Randazza of Randazza Legal Group, and tell his version of the case, are former and current clients, they post the alleged "facts" just how Randazza tells them to and they go simply on his word. In theory this would be fine as it could be construed as their opinion of the case, however, this is VERY SERIOUS, as many are lawyers, financial companies, trusted media outlets and the public at large and JUDGES take this information as FACTUAL "Legal Commentary", as Judge Gloria Navarro did in Randazza vs. Cox and used this information to put her own price tag on what my blogs were worth (\$100 Each) and she used this "Legal Commentary", to simply take away my rights of due process and constitutional rights.

When you have "Internet Mobbing" by a notable gang of attorneys, media, financial investigators, npr, and other media outlets that the public at large feels is credible, and they create a firestorm of blog posts, radio shows, AP articles and more that paint the case a certain way, there is nothing that the Defendant can do except for settle and then be forced to pay the attorney fees.

I believe they work both sides, conspire, email, phone call and conspire to pressure their clients and the clients of their "friends" in the co-conspiring, Internet Mobbing Gang

I, Pro Se Defendant Crystal Cox request this court print all listed blogs, websites as evidence in this case. Plaintiff Marc Randazza, in Criminal and Civil Conspire with this court, Godaddy and a Ring of Bloggers, Attorneys, and Journalists, have removed a mass amount of my investigative blogs regarding the iViewit Technology Story and the involved of Plaintiff Marc Randazza. I, Pro Se Defendant Crystal Cox request this court print all pages of all blogs listed and file with this case as exhibits, in order to preserve evidence, the record and safeguard the public at large.

Due to this court acting to remove these evidentiary blogs and allowing Plaintiff Marc Randazza to change the content. All links to blogs contained herein are fully incorporated by reference to the URL with all links and evidence within the main url. Each URL and all sublinks within each URL must be fully printed as well.

List of Blogs, Sites to be Printed by this Court and enter in as Evidence in their Entirety.

www.CrystalCox.com

<http://www.leonsimson.blogspot.com/>

ethicscomplaint.com, ethicscomplaint.blogspot.com

<http://www.bankruptcycorruption.com/>, <http://bankruptcycorruptionblog.blogspot.com/>

<http://www.judgemarcohernandez.com/>

<http://www.obsidianvcox.com/>

<http://www.crystalcoxcase.com/>

<http://www.obsidianfinancesucks.com/>

<http://obsidianfinancesucks.blogspot.com/>

<http://www.kevinpadrick.com/>

<http://www.objectiontofees.com/>

<http://kevinpadrickobsidianfinance.blogspot.com/>

<http://www.patriciawhittington.com/>

<http://www.leonsimson.blogspot.com/>

<http://www.stevenhedberg.com/>

<http://obsidianfinancesucks.blogspot.com/>

www.WhistleblowerMedia.com

<http://www.obsidianfinancesucks.com/>

<http://www.davidcarrsucks.com/>

<http://www.iviewit.tv/>

<http://pornnewstoday.com/pnt/>

<http://foxxmediagroup.com/>

<http://www.stevedowling.com/>

<http://www.deniedpatent.com/>

<http://www.stevenhedberg.blogspot.com/>

<http://www.stevenhedberg.com/>

<http://www.summit1031bkjustice.com/>

<http://www.obsidianfinancesucks.com/>

<http://obsidiansucks.blogspot.com/>

<http://www.defamationdefense.com/>

<http://www.allenfagin.com/>

<http://www.anticorruptionmedia.com/>

<http://www.investigativeblogger.com/>

<http://investigativeblogger.blogspot.com/>

<http://www.industrywhistleblower.com/>

<http://industry-whistleblower.blogspot.com/>

<http://hamiltonmontananews.blogspot.com/>

<http://www.eurekamontananews.com/>

<http://eurekamontananews.blogspot.com/>

<http://www.kaigroenke.com/>

<http://www.eurekamontananews.com/>

<http://libbymontananews.blogspot.com/>

<http://www.allenfagin.com/>

<http://www.josephleccese.com/>

<http://www.greggmashberg.com/>

<http://www.exposekennethwhite.com/>

<http://www.brownwhitenehousesucks.com/>

<http://www.proskauerfraud.com/>

<http://www.proskauersucks.com/>

<http://www.proskauerrosesucks.com/>

<http://judgerobinclute.blogspot.com/>

<http://www.berniecassidy.com/>

<http://montanacorruption.blogspot.com/>

<http://www.tedlympus.com/>

<http://www.daddysworm.com/>

<http://www.alexisdevane.com/>

<http://www.alanpineschi.com/>

<http://www.davidcarrsucks.com/>

<http://tonkontorp.blogspot.com/>

<http://www.attorneycorruption.com/>

<http://www.crystalcoxmedia.com/>

<http://www.crystalcoxnews.com/>

<http://crystalcoxnews.blogspot.com/>

<http://www.crystalcox.tv/>

<http://www.crystalcox.net/>

<http://www.griznews.com/>

<http://www.northwesttribune.com/>

<http://www.patriciawhittington.blogspot.com/>

<http://www.millernashsucks.blogspot.com/>

<http://www.millernashsucks.com/>

<http://pacificcorpsucks.blogspot.com/>

<http://www.blackcapproject.com/>

<http://www.obsidianrenewablessucks.com/>

<http://www.michealdunn.com/>

<http://www.bloggersrights.com/>

<http://www.federalshieldlaw.com/>

<http://www.philipfalcone.com/>

<http://www.beneliason.com/>

www.summit1031bkjustice.com

<http://www.criminalendangerment.com/>

<http://unconstitutionalattorney.blogspot.com/>

<http://www.franklincable.com/>

<http://www.seangarnett.com/>

<http://www.dtoddgregory.com/>

<http://kevinpadrickobsidianfinance.blogspot.com/>

<http://pacificcorpsucks.blogspot.com/>

<http://obsidianrenewablessucks.blogspot.com/>

<http://attorneyviolatedmylegalrights.blogspot.com/>

<http://douglaschey.blogspot.com/>

<http://www.scottsherr.com/>

<http://www.toddoutten.com/>

<http://www.iviewit.tv/>

<http://iviewit.tv/wordpress/>

<http://www.deniedpatent.com/>

<http://intelcorruption.blogspot.com/>

<http://www.eliotbernstein.com/>

<http://www.alexisdevane.com/>

Was Kenneth Rubenstein.com, Alexis Devane is with MPEG LA, they pooled the iViewit Technology illegally within other patents.

<http://www.allenfagin.com/>

Allen Fagin Proskauer Rose

<http://www.josephleccese.com/>

Joseph Leccese Proskauer Rose Law Firm

<http://www.greggmashberg.com/>

Gregg Mashberg Proskauer Rose

<http://jorgelabarga.blogspot.com/>

Formerly JorgeLabarga.com

<http://raymondjoao.blogspot.com/>

Formerly Ramond Joao.com

<http://stevenckecker.blogspot.com/>

Formerly StevenCbecker.com

<http://www.toddoutten.com/>

<http://intelcorruption.blogspot.com/>

Formerly **BruceSewell.com**

<http://maryshapiro.blogspot.com/>

Formerly MaryShapiro.net

<http://www.foley-lardner.com/>

<http://www.greenbergtraurigsucks.com/>

<http://www.proskauerlawfirm.com/>

<http://royreardon.blogspot.com/>

Formerly RoyReardon.com

<http://www.stevedowling.com/>

<http://www.wimsweldens.com/>

<http://www.cubeantenna.com/>

<http://www.massiveshareholderfraud.com/>

<http://www.seconddepartment.com/>

<http://www.petersivere.com/>

<http://christophercwheeler.blogspot.com/>

Formerly ChristopherCwheeler.com

<http://www.teresarea.com/>

<http://artieminson.blogspot.com/>

Formerly ArtiMinson.com

<http://www.robinpainter.com/>

<http://www.jeffmarwil.com/>

<http://www.jamespelzer.com/>

<http://lesliebanderson.blogspot.com/>

Formerly LeslieBanderson.com

<http://ritaadler.blogspot.com/>

Formerly RitaAdler.com

<http://www.paulcrotty.com/>

<http://maryjunck.blogspot.com/>

Formerly maryjunck.com

<http://www.gregveon.com/>

<http://www.leeenterprisessucks.com/>

<http://www.marynewill.com/>

<http://www.philipfalcone.com/>

Philip Falcone Lightsquared

<http://www.sanjivahuja.com/>

<http://www.mssspectrum.com/>

<http://www.philliphumm.com/>

<http://kenboehm.blogspot.com/>

Formerly KenBoem.com

<http://www.peterjenson.com/>

<http://www.jeffreycarlisle.com/>

<http://www.davidmaura.com/>

<http://www.omarasali.com/>

<http://fredfesta.blogspot.com/>

Formerly Fred Festa .com

<http://www.perrybackus.com/>

<http://www.nansuroddy.com/>

<http://www.georgecorn.com/>

<http://www.robinclute.com/>

<http://www.berniecassidy.com/>

<http://www.robybowe.com/>

<http://www.richardchimberg.com/>

<http://www.thomassjoblom.com/>

<http://www.seungchong.com/>

<http://www.ronaldmeisburg.com/>

<http://matthewtriggscom.blogspot.com/>

<http://marckirschner.blogspot.com/>

Formerly Marc Kirschner.com

<http://www.hughrovit.com/>

<http://johnstankeyblog.blogspot.com/>

Formerly JohnStankey.com

Formerly www.randywhitestone.com/

<http://randywhitestone.blogspot.com/>

<http://larrystrickling.blogspot.com/>

Formerly Larry Strickling.com

<http://cascadiaproject.blogspot.com/>

<http://www.obsidianrenewablessucks.com/>

<http://www.kevinpadrick.com/>

<http://www.objectiontofees.com/>

<http://www.objectiontofees.com/>

<http://www.patriciawhittington.com/>

<http://www.sussmanshanksucks.com/>

<http://www.millernashsucks.com/>

<http://tonkontorp.blogspot.com/>

Formerly TonkonTorpSucks.com

<http://ceoraydavis.blogspot.com/>

Formerly CeoRayDavis.com

<http://www.jimdiegel.com/>

<http://www.anniebuell.com/>

<http://www.stevenhedberg.com/>

<http://lyingtrolllegalgroupsucks.blogspot.com/>

<http://unethicalscumattorney.blogspot.com/>

<http://whistleblowermedia.blogspot.com/>

<http://www.proofofcorruption.com/>

<http://www.josephstilwell.com/>

<http://seniornewstv.blogspot.com/>

<http://www.realestateindustrywhistleblower.com/>

<http://federalricolawsuit.blogspot.com/>

<http://millernash.blogspot.com/>

<http://obsidianfinancesucks.blogspot.com/search/label/David%20W.%20Brown>

<http://anniebuell.blogspot.com/>

<http://douglaschey.blogspot.com/>

<http://www.toddoutten.com/>

<http://www.scottsherr.com/>

<http://petersivere.blogspot.com/>

<http://www.paulcrotty.com/>

<http://ritaadler.blogspot.com/>

<http://jonmadonna.blogspot.com/>

<http://www.leeenterprisessucks.com/>

<http://portlandoregonanti-corruption.blogspot.com/>

<http://hypocriteattorney.blogspot.com/>

<http://www.janinerobben.com/>

<http://duanebosworth.blogspot.com/>

<http://www.stephenlamont.com/>

<http://intelcorruption.blogspot.com/>

<http://whistleblowermedia.blogspot.com/>

<http://www.garystachlowski.com/>

<http://www.lesbiannewspaper.com/>

<http://www.davidsaman.blogspot.com/>

<http://womanhatingrabidlawyer.blogspot.com/>

<http://obsidianfinancesucks.blogspot.com/>

<http://www.actsofmedia.com/>

<http://www.kalispellmontananews.com/>

<http://www.whitefishmontananews.com/>

<http://crystalcoxnews.blogspot.com/>

<http://exposecorruptionblog.blogspot.com/>

<http://stevenhedberg.blogspot.com/>

<http://bankruptcycorruptionblog.blogspot.com/>

<http://www.exposeevil.com/>

<http://www.daddysworm.com/>

<http://www.conniebedwell.com/>

<http://www.exposechildmolesters.com/>

<http://www.thomassjoblom.com/>

<http://montanamoxy.blogspot.com/>

<http://ronaldmeisburg.blogspot.com/>

<http://www.michaelspreadbury.com/>

<http://www.georgecorn.com/>

<http://www.royceengstrom.com/>

<http://www.francisgurry.com/>

<http://intelcorruption.blogspot.com/>

<http://www.investigativejournalist.net/>

<http://www.gailmackie.com/>

<http://www.dylanenergysucks.com/>

<http://martincainchp.blogspot.com/>

<http://randywhitestone.blogspot.com/>

<http://suppressthetruth.blogspot.com/>

<http://www.exposecourtcorruption.com/>

<http://www.oregoniansucks.com/>

<http://www.ancerhaggerty.com/>

<http://kevinpadrickobsidianfinance.blogspot.com//>

<http://michaelgrenier.blogspot.com/>

www.ShelleyLubben.com

<http://hookersforjesus.net/>

<http://www.iamsecond.com/>

<http://www.mssspectrum.com/>

PornNewsToday.com, MonicaAtHome.com, ChristianPornStar.com, PornWorthWatching.com, MonicaF.com, PornStarHookerAlert.com, FoxxMediaGroup.com, AmericanSatanism.com, PornInTheValley.com, MomsAgainstMedia.org, PornPimpingPolitics.com, and are hereby included as evidence into this case in their entirety.

<http://www.shelleylubben.com/>

I, Pro Se Defendant Crystal Cox demand that this court print out archives of blogs this court allowed Marc Randazza to Remove

<http://marcrandazzaegomaniac.blogspot.com/>

<http://www.marcrandazzasucks.com/>

<http://trollmarcrandazza.com/>

<http://www.crystalcoxmarcrandazza.com/>

<http://www.hypocritemarcrandazza.com/>

<http://www.fuckmarcrandazza.com/>

<http://marc-randazza.blogspot.com/>

<http://markrandazza.blogspot.com/>

<http://www.exposemarcrandazza.com/>

www.MarcRandazza.com

www.Markrandazza.blogspot.com

www.Marcrandazzaparody.com

<http://www.fuckmarcrandazza.com/>

<http://marcrandazzafreespeech.blogspot.com/>

<http://www.marcrandazzasucks.com/>

marcrandazzaviolatedmylegalrights.blogspot.com

<http://www.bloggersrights.com/2012/03/marc-randazza-defends-rush-limbaugh-in.html>

<http://ethicscomplaint.blogspot.com/2012/06/marc-j-randazza-randazza-legal-group.html>

<http://www.defamationdefense.com/search/label/Marc%20Randazza>

<http://marcrandazzaegomaniac.blogspot.com/>

<http://marcrandazza.blogspot.com/>

<http://marcrandazzaliedaboutcrystalcox.blogspot.com/>

MarcRandazza.com

RandazzaLegalGroupSucks.com

www.CrystalCoxMarcRandazz.com

www.marcjrandazza.com

www.marcjohnrandazza.com

www.marcrandazza.info

www.marcrandazza.biz

www.marcrandazza.org

marc-randazza.blogspot.com

marcrandazzaviolatedmylegalrights.blogspot.com

www.MarcRandazzasALyingAsshole.com

I, Pro Se Defendant Crystal Cox respectfully state that all of the below listed documents have pertinent and important information regarding this case and the reasons Plaintiff filed this case, and I request that ALL prior documents be considered as included in this Court Ordered Amended Complaint Answer

I, Pro Se Defendant Crystal Cox respectfully Re-Submit / Re-Allege in FULL all following paragraphs, statements, documents of this case thus far with this Complaint Answer and with it I Reallege all I, Pro Se Defendant Crystal Cox / Pro Se Counter Plaintiff stated in ALL prior motions in this lawsuit, included and not limited to my Original Complaint Answer, My Motion in Opposition of Ex Parte Motion, My Motion for Removal / Reclusal / Disqualification of Judge Gloria Navarro, My Motion Requesting a Protective Order, My Motion to Notify Auditors, My REPLY to Response to 2 MOTION for Temporary Restraining Order, My MOTION to Request This Court Investigate Plaintiff Marc Randazza,

Also; my Original Counter Claim, my Amended Counter Claim, my RESPONSE to 2 MOTION for Temporary Restraining Order, my MOTION Motion Requesting Plaintiff Inform Insurance Providers of Liability, Seek Outside Counsel, and Disclosing Malpractice Issues, regarding Plaintiff Randazzas Ex-Client Defendant Crystal Cox, and case related issues, my REPLY to Response to 47 MOTION for Protective Order filed by Counter Claimant Crystal L Cox,

Also; Counter Defendant Crystal L Cox, ADDENDUM to REPLY to Response to 47 MOTION for Protective Order, my Court Notice of Emergency Notice to Court of Violent Actions of Counter Defendant Ari Bass aKa Michael Whiteacre and Sean Tompkins. Protective Ordered Requested, my MOTION/APPLICATION for Leave to Proceed in forma pauperis, 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, my Motion for Summary Judgement against Plaintiff, Memorandum to my Summary Judgement against Plaintiff, Motion to File In Forma Paupus, Reply to Opposition of Forma Paupus, Motion to Sanction Marc J. Randazza and Ronald D. Green, Reply to Response to Motion to Sanction, Counter Complaint, Amended, and all motions, addendums and exhibits previously filed in this case, as they have lots of factual, pertinent, relevant information in my defense and in this case as a whole.

Note To 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, 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 statues 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 a in a criminal complaint, forthcoming.

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.

Judge Gloria Navarro refuses to disqualify herself and has conflict with the Plaintiff. Judge Gloria Navarro consistently gives Plaintiff unconstitutional Preliminary Injunctions. The Righthaven case, Liberty Media V. Magnus, and Viaview are recent cases where Judge Gloria Navarro has favored Plaintiff.

Plaintiff is a Nevada Attorney and is believed to have mafia connections. Judge Gloria Navarro has violated my rights and has not treated me fairly or equal under the law or the Constitution of the United States.

I once again request that Judge Gloria Navarro and all making decision in this case sign a Conflict of Interest Disclosure admitting or denying conflict. It is the law and it is my legal and constitutional right. I have a lawful right to an impartial judge.

Defendant Crystal Cox has a right to be heard and a right to due process of law. This court continues to deny my lawful and constitutional rights. I have the right of a Defense, and of a counter claim and my intellectual property, blogs, domain names and voice have Been taken by this court, repeatedly. This court has allowed my life to put in danger and has taken all my rights.

It is an unlawful, unconstitutional violation of my right to due process to strike my counter claim, and my summary judgement be ignored, while the Plaintiff files whatever version of the facts he wants and Judge Gloria Navarro hears him as fact, and strikes my motions as irrelevant, unrelated, derogatory, non-comprehensive. Judge Gloria Navarro has not treated me, Pro Se Litigant Crystal Cox Fairly in District of Nevada

I, Pro Se Defendant Crystal Cox specifically Invoke the following laws, statutes, and constitutional amendments in my Defense in this case.

Laws Specifically Invoked by Defendant Crystal Cox in Her Defense.

Defendant Crystal Cox Specifically Invokes Anti-Slapp Laws, Nevada SLAPP Statutes. This Lawsuit was filed frivolously and has cost taxpayer and defendants.

Defendant Crystal Cox Specifically Invokes the First Amendment of the United States Constitution. can be seized, blogs deleted, links broken, and intellectual property taken, irreparable damage caused. The First Amendment Rights at issue in this case must be Adjudicated before domain names.

Defendant Crystal Cox Specifically Invokes the Fourteenth Amendment of the United States Constitution.

Defendant Crystal Cox Specifically Invokes Anti-Trust Laws, the Sherman Act, Fair Competition Laws, as Plaintiff is interfering with fair competition with search engine results.

Defendant Crystal Cox Specifically Invokes The Fair Competition Act (FCA), The Sherman Antitrust Act (1890), Antitrust Policy and Competition.

Defendant Crystal Cox Specifically Invokes all Freedom of Speech Laws. Freedom of speech is the political right to communicate one's opinions and ideas.

The right to freedom of expression is recognized as a human right under Article 19 of the Universal Declaration of Human Rights and recognized in international human rights law in the International Covenant on Civil and Political Rights (ICCPR). Article 19 of the ICCPR states that "[e]veryone shall have the right to hold opinions without interference" and "everyone shall have the right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or through any other media of his choice".

Defendant Crystal Cox Specifically Invokes Nevada Retraction Laws in her Defense. As Plaintiff did not ask for a retraction before filing a frivolous and costly lawsuit.

Defendant Crystal Cox Specifically Invokes ALL Malpractice Laws as Plaintiff was Defendants Attorney in related matters.

**I, Defendant Crystal Cox Declare the following Cases Connected to This Case
(this is important for any future RICO Legal Action and the Public at Large)**

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

AND

Circuit Court of Oregon Multnomah County Case No. 121215329 and Ninth Circuit Appeal Case: 12-35319.

AND

Supreme Court of the State of New York; County of New York, Case Number 105573-2011 (Rakofsky v. The Interne) with same Defendants involved. Manwin V. Nicholas Bulgin, Central California 2:12-cv-02484-GW-SH

AND

iViewit SEC Complaint, Dated Feb. 12 2010, Filed by Eliot Bernstein, United States District Court Southern District of New Youk, 07-CIV-11196 (SAS) and 07-CIV-9599

All case dockets, documents, exhibits are hereby included in this case as evidence of criminal and civil conspiracy, in their entirety..

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

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing on: **On March 4th, 2013**

VIA Electronic Service to the District of Nevada Court

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