

Procedure (FRCP) regarding the commission of certain dignitary torts of defamation and false light of President Donald John Trump and William Jefferson Clinton for publishing false, libelous, and slanderous material about both William Jefferson Clinton and Donald John Trump as being friends and perhaps business partners or clients of Jeffrey Epstein and Ghislain Maxwell. In bringing forth this complaint, the plaintiff states, avers, and alleges the following

I.) NATURE OF THE CASE

- 1.) While most people do not know who Erin Burnett of CNN is, almost everyone knows who Stephen Curry and Ayeshia Curry. In the plaintiff's opinion, Steph Curry does not get enough credit being the greatest basketball player in the history of the NBA surpassing both Michael Jordan and LeBron James. On around 2015 (about 10 years ago), the plaintiff heard Erin Burnett of CNN say that she thinks that Riley Curry is "annoying."
- 2.) Pursuant to Rule 201 of Federal Rules of Evidence (FRE), the court should take judicial notice that Riley Curry is the first daughter of Steph and Ayeshia Curry.
- 3.) Because the plaintiff was a fan of Steph and Ayeshia Curry on or around 2015 (like the Beyonce "Beyhive"), the plaintiff was offended that a journalist on CNN would refer to a black or African-American child as being "annoying."
- 4.) As such, the plaintiff believed at the time and perhaps believes now that Erin Burnett of CNN is racist against black children such as Riley Curry as the daughter of Steph and Ayeshia Curry.
- 5.) While Erin Burnett of CNN has the freedom of speech and the freedom of the press to state her opinion about Riley Curry as daughter of Steph and Ayeshia Curry, the plaintiff also has the freedom of speech to criticize Erin Burnett as a public figure as a journalist on the 24-hour news cycle.

- 6.) The plaintiff could file a complaint about Erin Burnett's racist comments towards Riley Curry as being annoying to Federal Communications Commission (FCC), Better Business Bureau (BBB) and/or Federal Trade Commission (FTC), although the plaintiff thinks it is more effective to file a lawsuit complaint and the provide a copy of that complaint and/or judgment to the above-referenced agencies.
- 7.) Nevertheless, the plaintiff is only seeking the equitable remedy of an injunction in this case pursuant to Rule 65 of Federal Rules of Civil Procedure (FRCP) and/or a declaratory judgment pursuant to Rule 57 of Federal Rules of Civil Procedure (FRCP).
- 8.) As such, the plaintiff is not seeking punitive, compensatory, and/or treble damages as the statute of limitations may have run out on such a claim and could be an affirmative defense notwithstanding the fact that plaintiff argues that statute of limitations should be equitably tolled and/or extended given the egregious nature of the racist and condescending comments by Erin Burnett of CNN.
- 9.) In addition, regarding a separate claim as a supporter of President Donald J. Trump, the plaintiff argues that he has standing, causation, and redressability to bring this lawsuit as **Presidential Candidate # P60005535** recognized by the federal government of the United States (Federal Election Commission) on Constitution Avenue. The following website proves that the plaintiff is recognized by the executive branch of the federal government of United States.

<https://www.fec.gov/data/candidate/P60005535/?cycle=2016>

<https://www.fec.gov/data/committee/C00569897/?cycle=2016>

- 10.) The following website proves that the government of the state of Florida was the very first state to recognize the plaintiff's presidential campaign

back in 2015 from the Secretary of State Ken Detzner's office at RA Gray Building in Tallahassee from a letter sent to the plaintiff by Kristi Reid Bronson from the Bureau of Election Records

<https://dos.elections.myflorida.com/candidates/CanDetail.asp?account=64680>

- 11.) If the federal court in New Jersey decides that the plaintiff does not have standing, causation, and redressability to bring a cause of action against the defendants for defamation/false light as a presidential candidate who supports both Donald J. Trump and William Jefferson Clinton, then the plaintiff respectfully requests that there be a joinder of acting USA attorney Alina Haba of New Jersey as a necessary and indispensable party pursuant to Rule 19 of Federal Rules of Civil Procedure (FRCP) as a plaintiff in addition to US attorney Jeanine Pirro of Washington, DC both of whom would have standing, causation, and redressability to bring a defamation lawsuit against the defendants under the parent corporation of AT&T and Time Warner against which the plaintiff has litigated in Northern Georgia, Northern Texas, and Southern New York presided over by Judge Thomas Thrash in Northern Georgia and former Chief Judge Loretta Preska in Southern New York (SDNY).

II.) PARTIES TO THIS LITIGATION

- 12.) The plaintiff is an indigent, disabled, and unemployed resident of the state of Nevada and Maryland. His current mailing address is 5108 Cornelias Prospect Drive, Bowie, Maryland 20720. His cell phone number is currently (703)936-3043 and his primary email address is einsteinrockstar2@outlook.com.
- 13.) The first defendant is the journalist Erin Burnett of Outfront on Cable News Network (CNN)
- 14.) The second defendant is Jason Carroll who appears on the Erin Burnett show
- 15.) Andrew Kaczynski of K-File who also appears on the Erin Burnett show

- 16.) The fourth defendant is Manu Raju who also appears on the Erin Burnett show
- 17.) The fifth defendant is Dr. Sanjay Gupta who also appears on the Erin Burnett show
- 18.) The sixth defendant is Jake Tapper who has his own show before the Erin Burnett show at 6:00 pm Eastern Standard Time (EST)
- 19.) The seventh defendant is , Lawrence O' Donnell of The Last Word on MSNBC whose show appears at 10:00 pm on MSNBC
- 20.) The eighth defendant is BMW Cars of North America which advertises its automotive company during many of these shows.
- 21.) The ninth defendant is Nancy Mace of South Carolina as Congresswoman

III.) JURISDICTION AND VENUE

- 22.) According to Federal Rules of Civil Procedure 8(a)(1), Plaintiff is required to provide "a short and plain statement of the grounds for the court's jurisdiction, unless the court already has jurisdiction and the claim needs no new jurisdictional support;"
- 23.) Because the court does not already have personal or subject matter jurisdiction over this issue, it is necessary to engage in a brief discussion of the court's jurisdiction so that the defendants can not move to dismiss this case based on procedural grounds involving a lack of proper jurisdiction.
- 24.) Pursuant to 28 U.S.C.A. Section 1332, the U.S. District Court for the District of New Jersey (as an Article III court) has jurisdiction over this matter because there is complete diversity of jurisdiction between the Plaintiff and the four defendants given that the plaintiff lives in Sarasota, Florida and no longer in Fort Worth, Texas.
- 25.) As an Article III court, the U.S. District Court for the District of New Jersey also has subject matter jurisdiction over the present case at bar because this proceeding involves a discussion of Title VII of the Civil Rights Act of 1964, Americans with Disabilities Act of 1990, Equal Protection Clause, Due Process Clause, Fourth Amendment, and Privileges and Immunities Clause.

- 26.) Therefore, a federal question is presented by the implication of the black-letter law of the aforementioned federal statutes in addition to the discussion of Constitutional Law provisions.
- 27.) Venue in this jurisdiction is also proper pursuant to 28 U.S.C.A. Sections 1391 and 1400.
- 28.) Because the amount in controversy does exceeds \$75,000 (i.e. \$45,000,000 (45 million dollars) is more than \$75,000), this court has jurisdiction on the grounds of diversity and a federal question presented.

IV.) STATEMENT OF FACTS

- 29.) The plaintiff argues that the Central Intelligence Agency (CIA) desperately latches onto CNN as its propaganda outlet in addition to the British Secret Service or MI5/MI6
- 30.) The administration of Donald J. Trump is currently investigating both John Brennan and John Bolton in which JohnnBrennan is the former CIA director and JOhn Bolton is the former national security advisor.
<https://apnews.com/article/fbi-bolton-trump-justice-department-search-investigation-0c49586ea608a80bc738dca5c4cbc6ea>

<https://www.nbcnews.com/politics/justice-department/trump-administration-targets-comey-brennan-new-investigation-rcna217713>

<https://www.youtube.com/watch?v=v3GiAg1CAD8>
- 31.) The administration of Donald J. Trump is also investigating Letitia James as the attorney general of the state of Ne York in addition to Lisa Cook as a Federal Reserve Bank board member.
- 32.) The administration of Donald J. Trump is also investigating Beyonce Knowles and Oprah Winfrey for unknown reasons and President Barack Obama for the Russian collusion hoax as announced by Director of National Intelligence (DNI) Tulsi Gabbard who is also a “democrat for Trump” like the plaintiff.
- 33.) Because the plaintiff is a “democrat for Trump” like Tulsi Gabbard, he supports Attorney Geneal Pam Bondi, FBI director Kash Patel, and FBI Deputy Director Dan Bongino as former Secret Service agent all of whom refer to James Comey and JOhn Brennan as part of “deep state.”

- 34.) Pursuant to Rule 201 of Federal Rules of Evidence (FRE), the court should take judicial notice that the CIA did not even know the plaintiff's grandfather Clarence I. Smith (CIS) had his own holiday in Lumberton, North Carolina by starting the first Catholic school for black children with Marie Moss Smith and being the first dentist there.
- 35.) During the Bush Administration in 2002, both Mayor Raymond Pennington and City Clerk Laney Sapp honored Clarence I. Smith by declaring that Cinco de Mayo or May 5th is Clarence Smith day in North Carolina as the following website proves this with an image of the proclamation in the plaintiff's position in his basement.
<https://www.pinterest.com/pin/943433821941208371/>
<https://www.pinterest.com/pin/943433821941208021/>
<https://www.pinterest.com/pin/943433821941208005/>
- 36.) In addition, the CIA did not know that the plaintiff was baptized in the Catholic church by a United States park police officer named William Morris who also served in the Army who is in the following image on social media.
<https://www.pinterest.com/pin/352054895880985246/>
- 37.) Furthermore, the CIA did not know that the plaintiff's relative John A. Moss was the Captain of the Battle of Gettysburg according to Washington, DC history and was the first black judicial officer in Washington, DC after being appointed by Presidents Rutherford B. Hayes, Grover Cleveland, and James Garfield in addition to being awarded a gold cane in a museum for defending a white police officer in the post-slavery era in which he practiced law in Anacostia in SE Washington, DC.
<https://www.pinterest.com/pin/352054895880985325/>
- 38.) As if this were not enough circumstantial evidence to prove the material fact that the plaintiff is both Catholic and African-American, this Washington Post article proves the material fact that the plaintiff's relative William Benjamin started the first opera in Washington, DC for African-Americans.
<https://www.washingtonpost.com/archive/lifestyle/2007/02/24/from-church-to-stage-black-opera-company-was-the-citys-first/96410f26-6427-400a-8ea7-8715a1c2bd05/>

39.) In addition, the first black graduate of the U.S. Naval Academy Wesley A. Brown and his wife Crystal Brown attended the plaintiff's law school graduation party in the Stonegate neighborhood of Silver Spring, Maryland and told the plaintiff that if there was movie about his life as first black graduate of U.S. Naval Academy (like Antawn Fisher), then he would want the plaintiff to play the role of him in that movie.

<https://www.pinterest.com/pin/352054895880985240/>

40.) The plaintiff believes that CIA utilizes commercials on CNN and with BMW to communicate meaningless and annoying subliminal messages to the plaintiff which constitute harassment and Civil Rights violations such as "YAN SOG" as an anagram of the plaintiff's song SAY NO TO DRUGS (track # 5 on Unleash the Beast) which would ne connected to the name of Dr. Sanjay Gupta who is not the plaintiff's favorite neuroscientist as Dr; Ben Carson is a black man who is better and smarter than Dr. Sanjay Gupta.

<https://www.youtube.com/watch?v=aqOAFxZyReo>

41.) The CIA is also very insecure about the fact that the plaintiff got married to Sabine Jules in 2002 while the plaintiff was being racially-profiled by the Bush Administration as being Arabic and Muslim when he is clearly a Catholic black man. Judge Rodolfo Ruiz presided over the Southern Florida case against Sabine Jules to obtain an annulment arguing the stare decisis of *Loving v. Virginia*.

<https://www.casemine.com/judgement/us/63ca1905c607d741f64ce112>

https://www.youtube.com/watch?v=INnJBzUY5_Y&t=211s

https://www.youtube.com/watch?v=TXJRF_Ho5NY&t=568s

[https://www.pacermonitor.com/public/case/2943716/Emrit v Scott et al](https://www.pacermonitor.com/public/case/2943716/Emrit_v_Scott_et_al)

42.) The plaintiff was divorced from Sabine JULES in 2006 by order of Judge Susan Greenhawt of Fort Lauderdale, Florida and his parental rights were ended in 2009 declaring that the plaintiff has not been recognized as being a father for 16 years now.

1.) The plaintiff also believes that both CIA and CNN communicate messages connected to freemasonry and the number "33" like Larry Bird with the acronym of YAN STU (YOu are not Special to us) or YAN SOG as in YOu are not successful or glorious. These subliminal messages have little meaning to someone who is Catholic and a recording artists on YouTube that wants nothing to do with CIA as Presidential Candidate # P60005535.

2.) Furthermore, the plaintiff's lawsuit last year against Republic of Cuba before the "Hunter Biden Judge" Mary Ellen NOreika confirms that the plaintiff has only been to Cuba ONE time over 20 yeas ago in 1999 with his friend Damond Ford of Silver Spring, Maryland to visit a medical student (rachel Barreiro Garcia) and her friend (Marena Linares) both of whom were over obviously over 18 years old.

<https://dockets.justia.com/docket/delaware/dedce/1:2024cv00290/85120>

https://www.pacermonitor.com/public/case/52593246/Emrit_v_The_Republic_of_Cuba_et_al

3.) As such, traveling tio Cuba ONE time to visit a friend is not sufficient grounds for a FISA warrant which is a preposterous ans ridiculous idea given that thousands of Americans travel to Cuba every year through third countries such as the famous Michael Moore for his movie "Sicko"

<https://www.youtube.com/watch?v=j7cME3ICdwE&t=7s>

4.) To clarify, Americans do not get jailed and very few are fined for traveling to Cuba which is under the jurisdiction of the U.S. Treasury Department Office of Foreign Assets Control (OFAC) and not CIA and Americans are also free to contact foreign embassies or consulates to make travel arrangements which in that case would involve Cuban Embassy at 2630 16th Street, NW Washington, DC 20009 as this website proves that State Department directs American citizens to contact the Cuban Embassy in Washington, DC for travel arrangements

<https://cu.usembassy.gov/services/traveling-to-cuba/>

<https://cu.usembassy.gov/services/traveling-to-cuba/>

<https://cu.usembassy.gov/services/traveling-to-cuba/>

<https://cu.usembassy.gov/>

<https://travel.state.gov/content/travel/en/consularnotification/ConsularNotificationandAccess/Cuba.html>

https://en.wikipedia.org/wiki/Embassy_of_the_United_States,_Havana

<https://www.pinterest.com/pin/943433821944188936/>

<https://www.pinterest.com/pin/943433821944188949/>

<https://www.pinterest.com/pin/943433821944188917/>

<https://www.pinterest.com/pin/943433821944188929/>

<https://www.pinterest.com/pin/943433821944188970/>

5.) Accordingly, the plaintiff had also communicated through email and mail with the United States Embassies in Warsaw, Poland and Kyiv, Ukraine to obtain a fiance visa for Maria Cherniavska from Kharkiv, Ukraine and Warsaw, Poland

https://en.wikipedia.org/wiki/Embassy_of_the_United_States,_Warsaw

https://en.wikipedia.org/wiki/Embassy_of_the_United_States,_Kyiv

V.) COUNT ONE: NEGLIGENCE

6.) The defendants have been particularly negligent in protecting valuable programs such as Medicaid and Medicare from the “Crazy MAGA Republicans” in Congress

VI.) COUNT TWO: TORTIOUS INTERFERENCE WITH BUSINESS RELATIONS

7.) The defendants are interfering with the plaintiff’s business relations/contracts by not offering him a job or position of employment at any of the Maryland colleges or universities as a disabled professor of entertainment law

8.) The elements of the tort can vary by state but generally include the following:

A.) A business relationship exists between the plaintiff and a third party that affords the plaintiff some legal right.

B.) The defendant has knowledge of that relationship.

C.) The defendant has the requisite intent to interfere with the relationship between the third party and the plaintiff.

D.) The defendant lacks justification to interfere with that relationship.

E.) The breach causes damages to the plaintiff.

VII.) COUNT THREE: TORTIOUS INTERFERENCE WITH FAMILY RELATIONS

9.) The defendants are interfering with the plaintiff's family relations by not providing him with a Section 8 housing voucher (HCV) Based off of the Fair Housing Act (FHA) and Americans with Disabilities Act of 1990 (ADA)

VIII.) COUNT FOUR: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (IIED)

10.) The defendants are committing the intentional infliction of emotional distress (IIED) by not providing him with a Section 8 housing voucher (HCV) Based off of the Fair Housing Act (FHA) and Americans with Disabilities Act of 1990 (ADA)

IX.) COUNT FIVE: VIOLATION OF EQUAL PROTECTION CLAUSE

11.) The defendants are violating the Equal Protection Clause by not providing him with a Section 8 housing voucher (HCV) Based off of the Fair Housing Act (FHA) and Americans with Disabilities Act of 1990 (ADA)

X.) COUNT SIX: VIOLATION OF DUE PROCESS CLAUSE

12.) The defendants are violating the Due Process Clause (substantive and procedural) by not providing him with a Section 8 housing voucher (HCV) Based off of the Fair Housing Act (FHA) and Americans with Disabilities Act of 1990 (ADA)

XI.) COUNT SEVEN: VIOLATION OF THE PRIVILEGES AND IMMUNITIES CLAUSE

- 13.) The defendants are violating the Privileges and Immunities Clause by not providing him with a Section 8 housing voucher (HCV) Based off of the Fair Housing Act (FHA) and Americans with Disabilities Act of 1990 (ADA)

VI.) PRAYER FOR RELIEF

WHEREFORE, the plaintiff is not any seeking punitive, compensatory, and treble damages through joint and several liability whereby the defendants would presumably seek contribution and indemnity from each other through the filing of cross-claims. The plaintiff is also seeking the equitable remedy of an injunction and/or declaratory judgment. In asserting this “prayer for relief,” the plaintiff states, avers, and alleges the following:

A.) Pursuant to **Rule 57 of Federal Rules of Civil Procedure (FRCP)**, the plaintiff is seeking a declaratory judgment declaring that the comments by Erin Burnett and CNN through vicarious liability and/or doctrine of respondeat superior are defamatory, libelous, and slanderous towards President Donald J. trump as the plaintiff is a supporter of President Donald J Trump.

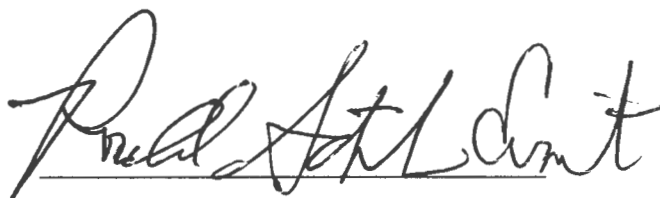
B.) Pursuant to **Rule 65 of Federal Rules of Civil Procedure (FRCP)**, the plaintiff is seeking a preliminary injunction precluding and/or enjoining CNN or any of its employees from defaming President Donald J. Trump with false, libelous, or slanderous material.

C.) Since the plaintiff is not seeking punitive, compensatory, or treble damages for the commission of the dignitary tory of defamation (libel and/or slander), the

plaintiff is also seeking an injunction requiring that CNN apologize for the racist and condescending comments towards Riley Curry as the daughter of Steph and Ayeshia Curry.

D.) If the issue of venue and/or forum non conveniens is relevant, the plaintiff respectfully requests that this case not be transferred to USA District Court of Maryland pursuant to **28 U.S.C. Section 1406** to have this case presided over by the “Abrego Garcia judges” who have been on the wrong side of due process and habeas corpus rights in which USA Supreme Court at One First Street, NE Washington, DC 20543 said that the return of Abrego Garcia must be facilitated by the current administration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ronald Satish Emrit". The signature is written in a cursive style with a horizontal line underneath the name.

Ronald Satish Emrit

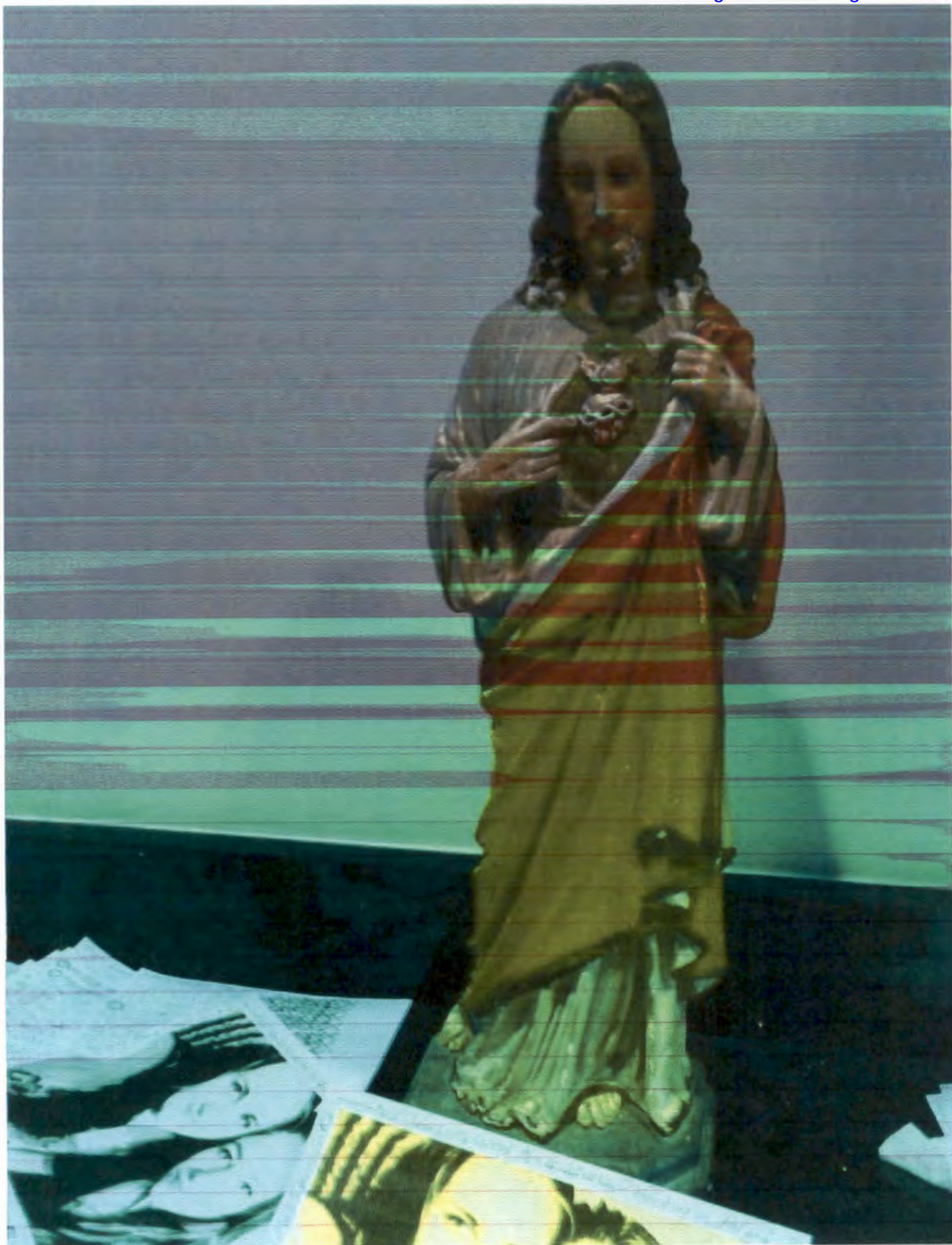
6655 38th Lane East

Sarasota, Florida 34243

(703)936-3043

einsteinrockstar@hotmail.com

einsteinrockstar2@outlook.com







**Lakeland Airside
Center Tenant
PARKING PERMIT**

ISSUED TO: _____

APPROVED: Laura Vaughn

AREA: SNF Operations AREA #: 104

PERMIT MUST BE FILLED OUT COMPLETELY AND THIS SIDE MUST BE VISIBLE IN LOWER LEFT WINDSHIELD.

**** SAFETY FIRST ****

AIRPLANES & PEDESTRIANS HAVE RIGHT OF WAY!

AUTHORIZES THIS VEHICLE TO PASS THROUGH SECURITY POST AT GATE 29 AND PROCEED TO LAKELAND AIRSIDE CENTER TENANT PARKING ALONG AIRPORT ACCESS ROAD. NO ACCESS IS PERMITTED PAST GATE 31.

This pass DOES NOT authorize Convention Site / Core Exhibit Area Access

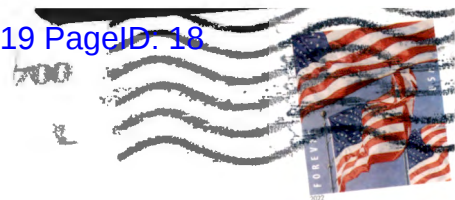
U.S. Department of Justice

*United States Marshals Service
Eastern District of Louisiana*

*500 Poydras St., SUITE 740
New Orleans, LA 70130-3310*

Official Business
Penalty for Private Use \$300

10 MAY 2025 AM 1



Ronald Satish Emmit
6655 38th Lane East
Sarasota, FL 34243

34243-796255



U.S. Department of Justice

*United States Marshals Service
Eastern District of Louisiana*

*500 Poydras St., SUITE 740
New Orleans, LA 70130-3310*

Official Business
Penalty for Private Use \$300

NEW ORLEANS LA 700

28 JUN 2025 AM 2 L



Ronald Satish Emrit
6655 38th Lane East
Sarasota, FL 34243

339 N7E 1 425C0207/10/25
NOTIFY SENDER OF NEW ADDRESS
EMRIT SATISH
5108 CORNELIAS PROSPECT DR
BOWIE MD 20720-3375

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FWD

BC: 20720337508 *2374-04822-10-19

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