

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA**  
**(Max Rosenn U.S. Courthouse, 197 South Main Street, Wilkes-Barre,  
PA 18701 )**

)  
 Presidential Candidate Number P60005535 )  
 "also known as" (aka) Ronald Satish Emrit, )  
 & Presidential Committee/Political Action )  
 Committee/Separate Segregated Fund (SSF) )  
 Number C00569897 d/b/a United )  
 Emrits of America )  
 Plaintiffs (Pro Se) )  
 v. )  
 )  
 Kim Kardashian, The Creation of Adam )  
 Painted by Michaelangelo, The Sistine )  
 Chapel, Pope Sixtus IV, The Bering Strait )  
 Connecting Alaska and Russian, Greenland, )  
 Denmark, The Copenhagen Interpretation of )  
 Quantum Physics/Mechanics, Schrodinger's )  
 Cat, Erin Burnett Outfront of Cable News )  
 Network (CNN), Sabine Aisha Jules, )  
 Maria Cherniavska of Warsaw, Poland, )  
 Jeffrey Rodriguez, Gregory Legagneur, )  
 Alexandra Legagneur, Daryl Christopher )  
 Brooks "also known as" Crooks, )  
 ALDI Grocery Store, ETSY Online Shopping, )  
 Kelly Clarkson, Kelly Ripa, Ryan Seacrest, )  
 Dancing with the Stars (DWTS), A\$AP Rocky, )  
 Robin Rihanna Fenty, Ye West, City of Key )  
 West, Florida, The Blair Witch (Moll Dyer) )  
 of Leonardtown, Maryland in Saint )

C. A. No.: 3:25-cv-02436

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PER OC DEPUTY CLERK

Mary's County and not Burkittsville, )  
Maryland in Frederick Count, Opus Dei (OD) )  
of Vatican City, Governor Oden Bowie )  
of Collington, Maryland, The Mythical Priory )  
of Sion Started by Pierre Plantard of France )  
in 1956 )  
Defendants, )  
 )  
 )

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### **COMPLAINT**

COMES NOW, the plaintiff Ronald Satish Emrit, who is bringing forth this complaint for 0 dollars and only looking for the equitable remedy of an injunction and/or declaratory judgment pursuant to **Rules 65 and 57 of Federal Rules of Civil Procedure (FRCP)** regarding the commission of the torts of public nuisance, industrial espionage, intentional infliction of emotional distress (IIED), and tortious interference with business relations/contracts all of which involves federal question pursuant to **28 U.S.C. Section 1331** by involving **Federal Tort Claims Act (FTCA) and diversity of jurisdiction**. In bringing forth this complaint, the plaintiff states, avers, and alleges the following

#### **I.) NATURE OF THE CASE**

- 1.) Although the plaintiff has a law degree (JD) from Saint Thomas University School of Law in Miami Gardens, Florida, the plaintiff is held to a less stringent standard than attorneys pursuant to the stare decisis and/or persuasive precedent of *Erickson v. Pardus* and *Eldridge v. Block*
- 1.) Pursuant to **Rule 201 of Federal Rules of Evidence (FRE)**, the court in the present case at bar should take judicial notice that all across the world, people are working on a theory of immortality, traveling backwards in time, and reversing the aging process.

- 2.) Although Albert Einstein's theory of special relativity does not allow for backwards time travel, the general theory of relativity involving the curvature of **Minkowski spacetime** into a **Riemannian manifold** as a **non-Euclidean geometry** does allow for some form of travel backwards in time despite the **grandfather paradox** involving complicated issues of causality and cause-and-effect relationships as opposed to correlations as part of **fractals in Chaos Theory** where subsequent conditions are very sensitive to initial conditions as with weather patterns all over the globe.
- 3.) In the plaintiff's humble opinion, eternal salvation and obtaining immortality is a two-fold process encompassing the first process of **having faith in Jesus Christ as the Lord and Saviour from the New Testament** with a New Covenant and then having the gnosis or wisdom of what occurred at the moment of creation from **The Book of Genesis in the Old Testament**.
- 4.) An existentialist with free will can choose to have faith in Jesus Christ as theology and philosophy do not negate each other although the existentialist does have to reject the Greek mythology concert of the Oedipus Complex which had also been highlighted by **Freudian psychology** involving "**puppets on a string**" and fate as an unavoidable consequence also like Sisyphus pushing a boulder up a hill despite the inevitable fate of the boulder being pushed back down the hill in which the existentialist Albert Camus described the struggle of Sisyphus as making him happy despite the unavoidable fate of the boulder being rolled back down the hill as what Oedipus Rex tried to avoid in the myth involving Lyus and Jocasta.
- 5.) Accordingly, the **Creation of Adam painted by Michaelangelo** on the Sistine Chapel at Vatican City named after Pope Sixtus IV is inherently connected to the **Bering Strait connecting Alaska to Russia** in which the plaintiff has attached an exhibit to illustrate this principle.
- 6.) Because Denmark owns the country of Greenland, the plaintiff also believes that the **Copenhagen Interpretation of Quantum Mechanics/Physics** is inherently connected to Bering Strait and Creation of Adam since Russia, Greenland, Alaska, and Denmark are all closer to the Northern Hemisphere and Scandinavia (Norway, Sweden, and Finland) rather than the Southern Hemisphere and Antarctica.
- 7.) Furthermore, the plaintiff believes that his former fiance Maria Cherniavska of Warsaw, Poland and original Kharkiv, Ukraine is connected to the **Mary**

**Magdalene from the painting of The Last Supper** by Leonardo Da Vinci also during the Renaissance as with Michaelangelo and The Creation of Adam.

- 8.) According to the Da Vinci Code by Ron Brown, the **V-shaped chalice** between Jesus Christ and Mary Magdalene in The Last Supper painting represents the Holy Grail as the lineage of Jesus Christ and Mary Magdalene according to the mythical secret society Priory of Sion started in 1956 by Pierre Plantard of France as the polar opposite of **Opus Dei** as ultra-conservative part of The Vatican trying to hide the secret of the lineage of Jesus Christ and Mary Magdalene involving **Sangreal** and sarcophagus of Mary Magdalene at **Roseline Chapel**.
- 9.) In The Book of Genesis, the time of the Big Bang was referred to as the **Planck Epoch** in which there was a **quark-gluon plasma** of free electrons that scattered photons about in the quark-gluon plasma.
- 10.) When the electrons were finally captured by the nuclei, they emitted the cosmic microwave background radiation which was discovered by Arno Penzias and Robert Wilson at **Bell Laboratories in Holmdel, New Jersey** on or around 1964 or 1965 as the same time that Peter Higgs had the idea of the Higgs Boson.
- 11.) To clarify, the problem with **Yang-Mills Theory** and the **gauge symmetry** is that they predict massless gauge bosons which is true for the photon and gluon as charge carriers for the electromagnetic and strong force but this does not account for the large mass of the **W and Z bosons** as charge carriers for the weak force (nuclear fission involving enriched uranium as isotopes of **U-238** and/or **U-235**).
- 12.) In order to account for the large mass of the W and Z bosons as gauge bosons for the weak force, the Yang-Mills Theory and gauge symmetry must be accompanied by a discussion of Spontaneous Symmetry Breaking, the Higgs Mechanism, the Higgs Field, the Higgs Boson and the **Mexican Hat energy potential distribution**.
- 13.) More specifically, gauge bosons like the W and Z bosons gain mass by interacting with the Higgs Field in the same manner that quarks and leptons gain mass by interacting with the Higgs Field although the strong force and gluons bind three quarks together to form nucleons, baryons, and/or hadrons

in the form of protons and neutrons discovered by **James Chadwick** as the quark was discovered by **Murray Gell-Mann**.

14.) According to **Spontaneous Symmetry Breaking**, there was one unified force in the Planck Epoch in which gravity was the very first force to separate followed by the strong force and ultimately with the electroweak force separating into electromagnetic and weak force which were unified by **Sheldon Glashow** of Harvard University who shared the Nobel Prize with Weinberg and Salam.

## **II.) PARTIES TO THIS LITIGATION**

- 15.) 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](mailto:einsteinrockstar2@outlook.com).
- 16.) The first defendant is Kim Kardashian,
- 17.) The second defendant is The Creation of Adam Painted by Michaelangelo,
- 18.) The third defendant is The Sistine Chapel,
- 19.) The fourth defendant is Pope Sixtus IV,
- 20.) The fifth defendant is the Bering Strait Connecting Alaska and Russia,
- 21.) The sixth defendant is the country and territory of Greenland,
- 22.) The seventh defendant is the country of Denmark,
- 23.) The eighth defendant is The Copenhagen Interpretation of
- 24.) Quantum Physics/Mechanics,
- 25.) The ninth defendant is Schrodinger's Cat,
- 26.) The tenth defendant is Erin Burnett Outfront of Cable News Network (CNN),
- 28.) The eleventh defendant is Sabine Aisha Jules of Fort Lauderdale, Florida
- 29.) The twelfth defendant is Maria Cherniavska of Warsaw, Poland,
- 30.) The thirteenth defendant is Jeffrey Rodriguez as husband of Sabine Aisha Jules,

- 31.) The fourteenth defendant is Gregory Legagneur as brother of Sabine Aisha Jules
- 32.) The fifteenth defendant is Alexandra Legagneur who is somehow connected to Library and Lighthouse of Alexandria as lost wonders of the world and perhaps Blair Witch of Leonardtown, Maryland,
- 33.) The sixteenth defendant is Daryl Christopher Brooks "also known as" Crooks who unfortunately is the nephew of the plaintiff and lives right next to plaintiff in the basement at 5108 Cornelias Prospect Drive and is a nuisance to the plaintiff with his unwelcome guests and trap music
- 34.) The seventeenth defendant is ALDI Grocery Store,
- 35.) The eighteenth defendant is ETSY Online Shopping,
- 36.) The nineteenth defendant is Kelly Clarkson whom the plaintiff briefly met at GRammy on the Hill at Willard Intercontinental Hotel off of Pennsylvania Avenue in Washington, DC in 2006
- 37.) The twentieth defendant is Kelly Ripa,
- 38.) The 21st defendant is the annoying Ryan Seacrest of The Grammys and American Idol
- 39.) The 22nd defendant is the annoying Dancing with the Stars (DWTS), A\$AP Rocky
- 40.) The 23rd defendant is Robin Rihanna Fenty,
- 41.) The 24th defendant is Ye West,
- 42.) The 25th defendant is City of Key West, Florida
- 43.) The 26th defendant is The Blair Witch (Moll Dyer) of Leonardtown, Maryland in Saint Mary's County and not Burkittsville, Maryland in Frederick County
- 44.) The 27th defendant is Opus Dei (OD) of Vatican City,
- 45.) The 28th defendant is Governor Oden Bowie of Collington, Maryland, The Mythical Priory of Sion Started by Pierre Plantard of France in 1956

### III.) JURISDICTION AND VENUE

- 46.) 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;"

47.) 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.

48.) Pursuant to **28 U.S.C.A. Section 1332**, the U.S. District Court for the District of Alaska (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.

49.) As an **Article III court**, the U.S. District Court for the District of Alaska 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.

50.) 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.

51.) Venue in this jurisdiction is also proper pursuant to **28 U.S.C.A. Sections 1391 and 1400**.

52.) Because the amount in controversy does not exceeds \$75,000 (i.e. \$0 is less than \$75,000), this court does not have jurisdiction based on the amount in controversy.

#### **IV.) STATEMENT OF FACTS**

53.) The plaintiff met the defendant Sabine Aisha Jules at the **Samba Room off of Las Olas Boulevard in Fort Lauderdale, Florida**.

54.) The plaintiff was introduced to Sabine Aisha Jules by his cousin Rhonda Sinondon who now lives in **Fayetteville, North Carolina close to Fort Bragg (Special Forces) and Pope AFB**.

55.) Apparently, Rhonda Sinondon attended nursing school at **Broward Community College (BCC)** in Fort Lauderdale along with Sabine Aisha Jules who is now a registered nurse (RN) as Kelly Jean Sabatino is a nurse who was in the music video for "**There She Goes Again**" at Brown

University directed by Indrayudh Shome who won an award in Hong Kong for his amazing work as a videographer and/or music video producer from Brown University like the plaintiff's former promoters Thomas Hart and Stanley "Skip" Kelly of **On the Potomac in Washington, DC** and Thomas Hart was the attorney for both LL Cool J (James Todd Smith) and Gloria Estefan at Holland and Knight off of Pennsylvania Avenue in Washington, DC..

- 56.) The plaintiff got into an argument with defendant Sabine Aisha Jules at the Hooters restaurant in Fort Lauderdale at the corner of **A1A and Las Olas Boulevard** not far from the **Quarterdeck Grill (QG)** where the plaintiff also went to a restaurant with defendant Sabine Aisha Jules and was reading a document from **Screen Actors' Guild (SAG)** in a notebook binder having something to do with a "ghost" and **Ogmios from Celtic legend in Great Britain**.
- 57.) The Hooters restaurant at A1A and Las Olas in Fort Lauderdale by the beach has something to do with **cancer cells, oncogenes, retroviruses, and doll eyes (oo)** referring to the movie "Annabelle" in the Conjuring series scarring both **Patrick Wilson and Vera Farmiga as "The Warrens"** as experts in demonology and witchcraft.
- 58.) This Hooters restaurant is also connected to the **Hoover Dam** in Nevada dividing Arizona from Nevada which was where Salma Hayek gave birth in the movie "Fools Rush In" starring Matthew Perry connected to the **Matthew Perry Courthouse in Columbia, South Carolina** where the Magistrate Judge Shiva Hodges (SH) presides over a similar case that the plaintiff has against Erin Burnett of CNN for defamation (libel and slander).
- 59.) The journalist by the name of **Margaret Hoover (MH) has the same initials as Mya Harrison (MH) of Greenbelt, Maryland** who attended Eleanor Roosevelt High School in Greenbelt, Maryland and who appeared at a Northeastersers event at **Martin's Crosswinds in Greenbelt, Maryland** where the plaintiff took the 2004 Maryland state bar examination and saw his former classmate **Elaine Orozco (EO) from the Philippines** who attended **Cannon Road elementary school off of New Hampshire Avenue in Silver Spring, Maryland**.
- 60.) Accordingly, the plaintiff believes that the phrase **“electron orbitals”(EO) is connected to Elaine Orozco and the movie “Captain**

**EO” at the Epcot Center in Orlando, Florida** featuring Michael Jackson in which the audience had to wear 3-d glasses to watch this Michael Jackson movie “Captain EO.”

- 61.) The electron orbitals (EO) are referred to as **Sommerfield orbitals (s,p,d,f)** and are in the form of an electron wave even though electrons have a wave-particle duality.
- 62.) The electrons in orbit obey the laws of quantum mechanics as opposed to classical mechanics which means that the electrons do not “crash” or collide with the nucleus unless there is something referred to as electron capture whereby a proton captures an electron and becomes a neutron discovered by **James Chadwick**.
- 63.) According to the concept of **Larmor frequency and/or power**, an accelerating electron should release a photon and move to a lower energy state that is quantized in discrete and specific amounts in which the lowest state is the 1s orbital as the ground state and the highest energy state of electrons would be the valence electrons as in the 6s orbital for the element **cesium which has an atomic number of 55** and is referred to as atomic clocks in **GPS satellites or Global Positioning System** (in geostationary or geosynchronous orbit above the equator) which experience a travel to the future by a fraction of a second as clocks tick slower in higher gravity which means that clocks tick faster in less gravity at **International Space Station (ISS)** for example according to Einstein’s laws of special relativity in which space and time are the same entity.
- 64.) However, the electron does not release a photon or lose energy even though it is changing its position around the nucleus when it orbits according to idea of **Larmor frequency or power**.
- 65.) Because the plaintiff is a supporter of President Donald J. Trump and is a Presidential Candidate with the number of **P60005535** provided by the Federal Election Commission (FEC) on Constitution Avenue in Washington, DC, he argues that he has standing, causation, and redressability to bring this lawsuit as an ardent and avid Trump supporter.
- 66.) About ten years ago, the plaintiff heard Erin Burnett of CNN refer to Riley Curry as the daughter of Steph and Ayesha Curry as being “annoying.”

67.) When a *white women who is a journalist refers to a black girl as being annoying*, that can be viewed as being a racist comment like Don Imus refer to black basketball players as being “nappy-headed.”

68.) While the Federal Communications Commission (FCC) and CNN overlooked this racist comment by Erin Burnett of CNN and decided not to apologize or change their programming, the plaintiff argues that it is more effective to bring a lawsuit rather than complain to the FCC or CNN neither of which control the federal judiciary.

69.) The statute of limitations probably ran out regarding any ability to complain about comments made ten years ago referring to Riley Curry as annoying, and so the statute of limitations could be raised as an affirmative defense.

70.) However, even after making these controversial comments about ten years ago, now it appears as if Erin Burnett of CNN is defaming both President William Jefferson Clinton and Donald John Trump by insinuating that the both of them are on a client list maintained by either Jeffrey Epstein or Ghislain Maxwell.

71.) The defendant Erin Burnett of CNN apparently interviews the Ukrainian president Volodymyr Zelenskyy without realizing that Riley Curry as a black American woman is more important to America and Americans than the Ukrainian president.

72.) Regarding a separate **transaction or occurrence (t/o)**, the plaintiff was in communication with someone named Maria Cherniavskaya who deactivated her WhatsApp account earlier this year.

73.) Back in the year 2022, the plaintiff sent about 300 Euros through a company d/b/a WISE to the **International Banking Account Number (IBAN)** of Maria Cherniavskaya in a **SWIFT transaction** so that the Ukrainian military could transport her from Kharkiv, Ukraine to Warsaw, Poland.

74.) Also in the year 2022, the plaintiff began communicating with Darya Ignateva of Kyiv, Ukraine who apparently refers to herself as a dentist but could perhaps be **artificial intelligence (AI)**.

75.) Nevertheless, the plaintiff argues that the first defendant Erin Burnett of CNN spends way too much time covering stories about Alexei Navalny and

Volodymyr Zelenskyy when CNN should be focused on stories featuring African-Americans.

#### **V.) COUNT ONE: PUBLIC NUISANCE**

76.) As a supporter of President Donald J. Trump and Secretary of Defense Pete Hegseth, the plaintiff believes that many of the liberals who oppose their administration are motivated by socialites who promote feminist agenda that emasculates weak males like **Bruce Jenner, Kanye West, Lamar Odom, and Travis Scott** and even **Reggie Bush who was ridiculed by Ray-J as the brother of Brandy** as being in love with a woman who is not considered to be wifey material based on a reputation from the world of adult entertainment in which men like Reggie Bush get ridiculed if their girlfriends or wives are considered to be too promiscuous in which public figures are subject to the standards of **New York Times v. Sullivan** and **Hustler v. Falwell** as it pertains to defamation in which there has to be a “**knowing falsity and reckless disregard for the truth**” whereby truth is defense to defamation in which a public figure like Kim Kardashian is often referred to as being too promiscuous to be a respectable woman in civilized society. This is the perfect song to describe Kim Kardashian’s mentality

[https://www.youtube.com/watch?v=1h\\_ExqClcz8&list=RDGMEMHDXYb1 DDSgDsobPsOFxpA&start\\_radio=1&rv=aQIEnyurC4c](https://www.youtube.com/watch?v=1h_ExqClcz8&list=RDGMEMHDXYb1 DDSgDsobPsOFxpA&start_radio=1&rv=aQIEnyurC4c)

77.) The plaintiff is not completely sure how the current president was brainwashed by Kim Kardashian to help a thug escape prosecution in Sweden named **A\$AP Rocky** who is currently dating Rihanna, but the **MAGA Republicans certainly do not support thugs from the hip hop or trap movement such as the disgusting thug in Charlotte, North Carolina involving a Ukrainian refugee on the subway.**

78.) We are no longer in the “hip hop era” controlled by thugs like **Tupac Amaru Shakur** and **Sean “P. Diddy” Combs**. Rather, we are in a different music era where reggaeton and electronic dance music (EDM) is considered

to be more stylish than hip hop and trap artists like **A\$AP ROcky, 2 Chains, and Travis Scott**. This is the kind of music which is in style right now

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

<https://www.youtube.com/watch?v=90RLzVUuXe4>

<https://www.youtube.com/watch?v=kTJczUoc26U>

79.) Kim Kardashian was able to become popular because of the socialite movement started by Paris Hilton and Nicole Richie around 2003, but her eyes and hair are too dark for those who prefer the blonde looks of **Marilyn Monroe and Madonna**

<https://www.youtube.com/watch?v=f2OGhJoypPw>

<https://www.youtube.com/watch?v=6p-1DYPR2P8>

<https://www.youtube.com/watch?v=9oqIZ0bv618>

<https://www.youtube.com/watch?v=s4QLFJb3krQ>

80.) They say Beauty is in the eye of the Beholder and according to the plaintiff's opinion, **the model Ashton P. in the music video Three-Car Garage is at least 100 times more beautiful and glamorous than any of the Kardashians or Jenners**

<https://www.youtube.com/watch?v=As8GMnZ5RTE>

81.) In addition, both Kelly Sabatino and Audrey Demick from Rhode Island are both at least 1,000 times more beautiful than any of the Kardashians or Jenners

<https://www.youtube.com/watch?v=1Wfh65eS2Oc>

82.) These are the embarrassing men who have been emasculated by the Kardashians and Jenners

<https://www.youtube.com/watch?v=G5iEniUb33w>

<https://www.youtube.com/watch?v=Co0tTeuUVhU>

<https://www.youtube.com/watch?v=aOIEnyurC4c>

[https://www.youtube.com/shorts/IECSJ05Pm\\_Q](https://www.youtube.com/shorts/IECSJ05Pm_Q)

83.)

#### **VI.) COUNT TWO: INDUSTRIAL ESPIONAGE**

- 84.) The defendant Erin Burnett of CNN has committed the tort of the invasion of privacy through false light by insinuating that both Presidents William Jefferson Clinton and Donald J. Trump are on the client list provided by either Jeffrey Epstein or Ghislain Maxwell.
- 85.) The tort of the invasion of privacy through false light is substantially similar to that of the dignitary tort of defamation which could be slander per se, slander per quod, libel per se, or libel per quod.
- 86.) The freedom of speech regarding some of these ideas was involved in cases in the early 1900s such as *Abrams v. United States, Dennis v. United States, Gitlow v. New York, Chaplinsky v. New Hampshire* in which many of these cases involved the Alien and Sedition Acts, Espionage Act of 1917, and/or The Smith Act especially involving the presidency of Woodrow Wilson during World War I who was awarded the Nobel Peace Prize and known for his Fourteen Points.

#### **VII.) COUNT THREE: INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS (IIED)**

- 87.) The defendant Erin Burnett of CNN has committed extreme and outrageous conduct by insinuating that both Presidents William Jefferson

Clinton and Donald J. Trump are on this client list provided by either Jeffrey Epstein or Ghislain Maxwell.

- 88.) The plaintiff argues that all supporters of Donald J. Trump are negatively affected in terms of the media's relentless and nonstop coverage of this defamatory publications about both Jeffrey Epstein and Ghislain Maxwell.
- 89.) As such, perhaps the doctrine of transferred intent would be an appropriate argument to establish that supporters of Donald J. Trump and William Jefferson Clinton would have standing, causation, and redressability to bring a case that they have also been negatively affected by the media's relentless defamation of their hero President Donald J. Trump.
- 90.) The defendant Maria Cherniavska of Warsaw, Poland has committed the intentional infliction of emotional distress IIED by deactivating her Whatsapp account without informing the plaintiff.

**COUNT FOUR: TORTIOUS INTERFERENCE WITH BUSINESS  
RELATIONS/CONTRACTS**

- 91.) The plaintiff argues that Kim Kardashian has committed the tortious interference with business relations/contracts by creating a culture in Hollywood that actively tries to emasculate weak males like Bruce Jenner, Lamar, Odom, Reggie Bush, Ye West, Travis Scott, and A\$AP Rocky most of whom are black males desperate to be accepted by rich socialites in Hollywood,

**VI.) PRAYER FOR RELIEF**

WHEREFORE, the plaintiff is not 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 fluid and cursive, with "Ronald" and "Emrit" being the most distinct parts.

Ronald Satish Emrit

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PER \_\_\_\_\_



Attn: Clerk of the Court  
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