

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF VIRGINIA  
( 255 W. Main Street, Room 304, Charlottesville, VA 22902)**

3:22cv00009

Ronald Satish Emrit,  
Plaintiff (Pro Se)

v.

Central Intelligence Agency (CIA),  
950 Pennsylvania Ave NW,  
Washington, DC 20535  
(202) 324-3000  
Defendant

C. A. No.:

CLERK'S OFFICE U.S. DIST. COURT  
AT CHARLOTTESVILLE, VA  
FILED

MAR 03 2022

JULIA C. DUDLEY, CLERK  
BY:  DEPUTY CLERK

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**COMPLAINT**

COMES NOW, the plaintiff Ronald Satish Emrit, who is bringing forth this complaint against the sole governmental defendant for declaratory relief, injunctive relief, and pecuniary damages based on the intentional infliction of emotional distress (IIED) and other related dignitary torts related to the invasion of privacy through intrusion upon seclusion, false light, and misappropriation although not amounting to libel, slander, libel per se, slander per se, libel per quod, slander per quod, etc.. In addition, the plaintiff is filing this cause of action based on the wrongful institution of legal proceedings which is often referred to as malicious prosecution and the violations of various provisions of black-letter law such as the Civil Rights Act of 1964, 42 U.S.C. Section 1983, and the Americans with Disabilities Act of 1990 (ADA) enacted during the administration of George H.W.

Bush. In bringing forth this complaint, the plaintiff states, avers, and alleges the following:

**I.) NATURE OF THE CASE**

- 1.) Pursuant to Rule 201 of the Federal Rules of Evidence (FRE), the court should take judicial notice that the Honorable Judge James Cacheris of Eastern Virginia authorized service of process on December 29th of 2016 in the plaintiff's breach of contract case involving Continuum Legal, U.S. Department of Energy, and CACI, Inc. in which Continuum Legal was represented by the law firm of Paley Rothman and Rick Claxton in which a Roseboro Notice became the central issue.
- 2.) The plaintiff is seeking declaratory relief according to Rule 57 of the Federal Rules of Civil Procedure (FRCP) in the sense that the plaintiff is looking for the court to issue a statement of law regarding free speech and racial profiling as it relates to The World Factbook (CIA Almanac in the public domain), "There's Something Rotten in Denmark" (by Jeremy Kuzmarvov of Tulsa Community College and uploaded in digital commons of Florida International University (FIU), and **Bloodlines of Illuminati**, i.e. a book by Fritz Springmeier which is also in the public domain as protected free speech as it is available for sale on Amazon.
- 3.) The publication known as The World Factbook has been outsourced to the Government Publishing Office (GPO) which is an arm or political subdivision of Congress as the legislative branch and used to be known as the Government Printing Office (GPO) and is similar to the Office of Management and Budget (OMB) and Congressional Budget Office (CBO) in addition to the General Accountability Office (GAO).
- 4.) In addition, the publication known as The World Factbook has been outsourced to a private company "doing business as" (d/b/a) Skyhorse Publishing which reminds the plaintiff of the Horsehead Nebula, Cat's Eye

Nebula, Tarantula Nebula, and Crab Nebula which has a crab pulsar, i.e. a neutron star that is formed when a white dwarf star reaches its Chandrasekhar Limit of 1.4 solar masses and can no longer withstand gravity notwithstanding the electron degeneracy pressure keeping the star from collapsing. In the field of marine biology, a seahorse has been known to change its gender and the plaintiff had a seahorse screensaver on his computer in Bowie, Maryland around 2005.

- 5.) The trusted non-profit website Wikipedia (which takes donations) has mentioned quite succinctly and quite necessarily that nobody needs the permission of the Central Intelligence Agency (CIA) to either look at or disseminate the url links and/or web links of The World Factbook as the publication is in the public domain and is therefore not classified and is protected free speech under a broad interpretation of New York Times v. United States although not the free speech case of Snepp v. United States involving a constructive trust being imposed on a former CIA agent writing a book about his experiences in the Vietnam War. Wikipedia is presumably protected by Section 230 of the Communications Decency Act of 1996 in addition to the safe harbor provisions of the Digital Millennium Copyright Act (DMCA) ratified from provisions of the World Intellectual Property Organization (WIPO).
- 6.) The need to regulate free speech dates as far back as Justice Oliver Wendell Holmes of Boston, MA rendering an opinion in Schenck v. United States related to black-letter law legislation involving Espionage Act of 1917 and Alien and Sedition Acts although there would later be The Smith Act and Criminal Syndicalism Acts which would regulate free speech.
- 7.) The need to regulate free speech also dates back to Abrams v. United States in which pamphlets or brochures were circulated in Yiddish by anarchists who violated the "clear and present danger" standard established by Justice Oliver Wendell Holmes in Schenck v. United States, supra, around the year

1919 when there was conflict involving the Bolshevik Revolution in Russia (Nikola Lenn) and also World War I when Woodrow Wilson was dealing with the Zimmerman Telegram from Germany to Mexico (intercepted by the British like Alan Turing at Bletchley Park with the ENIGMA machine during World War II).

- 8.) The need to regulate free speech also dates back to the controversy surrounding Eugene V. Debs as a presidential candidate and representing unionized labor in the railway industry and to Supreme Court justice Daniel Chase trying to punish a farmer for treason simply because the farmer was a Republican political opponent of John Adams as a Federalist notwithstanding the fact that the farmer was ultimately pardoned by President John Adams whose outgoing Secretary of State John Marshall gave a presidential declaration to his brother to give to William Marbury making him a justice of the peace although Secretary of State John Marshall's brother forgot to give the presidential declaration to William Marbury causing William Marbury to file a lawsuit against the new Secretary of State James Madison (appointed by Thomas Jefferson) arguing that he should be entitled to a writ of mandamus appointing him as justice of the peace in the landmark 1803 case of Marbury v. Madison which established judicial review such that the Supreme Court could declare laws unconstitutional (the Secretary of State John Marshall was the Chief Justice who replaced John Jay of New York who was accustomed to "circuit riding" in the early days of the Supreme Court).
- 9.) The holding of the case Pollock v. Farmers' Loan Insurance addressed the issue of taxation according to the Constitution being levied as an apportionment according to census data or being levied according income bracket and status. Congress enacted the Sixteenth Amendment allowing the federal government to tax its citizens without addressing the apportionment issues which essentially overturned the decision of Pollock v. Farmers'

*Loan Insurance, supra* that held that the government must tax its citizens according to an apportionment and census data. The issues in this case are different from *Maryland v. McCulloch* which addressed the Necessary and Proper Cause as it related to a state bank levying taxes on a national bank in which the doctrine of federalism or preemption was most likely invoked.

- 10.) Because of the case of *Chisholm v. Georgia*, Congress passed the Eleventh Amendment giving sovereign immunity to the states because the executor of an estate for Robert Farquhar was trying to collect debt from the state of Georgia even though the executor of Robert Farquhar's estate was in Tennessee and sold wartime equipment to the state of Georgia. This case was also different from the case of *Fletcher v. Peck* involving the Yazoo land fraud in which the government of Georgia failed to rescind contracts for land that Chief Justice Marshall described as being "infected with fraud."

## II.) PARTIES TO THIS LITIGATION

- 11.) The plaintiff is an indigent, disabled, and unemployed resident of the state of Florida. His current mailing address is 6655 38th Lane East, Sarasota, FL 34243. His cell phone number is currently (703)936-3043 and his primary email address is [einsteinrockstar2@outlook.com](mailto:einsteinrockstar2@outlook.com). The plaintiff is filing this cause of action in the U.S. District Courts of Maryland, Eastern Virginia, and Western Virginia in Charlottesville because of the fact that the plaintiff does not know which location has exclusive, original or subject matter jurisdiction given that the plaintiff lives in Florida much of the time and lives in Maryland at some other times and the defendant has its principal place of business (ppb) and/or nerve center in either Langley, Virginia, at a nearby FARM, or in Washington, D.C. where there is an Office of Public Affairs and an Inspector General Robin Ashton located at the zip code 20505.
- 12.) The sole defendant is the Central Intelligence Agency (CIA). While the mailing address for the Office of Public Affairs (OPA as in Opa Locka,

Florida by Saint Thomas University School of Law where the plaintiff attended law school) is listed as Central Intelligence Agency (CIA) Office of Public Affairs, Washington, D.C. 20505, it is appropriate according to the Federal Rules of Civil Procedure (FRCP) to have the defendant CIA served with process at the Office of the Attorney General Merrick Garland and/or Secretary of State Antony Blinkin at 950 Pennsylvania Avenue in Washington, D.C. 20535.

### **III.) JURISDICTION AND VENUE**

13.) 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;"

14.) 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.

15.) Pursuant to 28 U.S.C.A. Section 1332, the U.S. District Court for the District of Maryland (as an Article III court) has jurisdiction over this matter because there is complete diversity of jurisdiction between the Plaintiff and the sole defendant.

16.) As an Article III court, the U.S. District Court for the District of Maryland 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.

17.) 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.

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

19.) Because the amount in controversy exceeds \$75,000 (i.e. \$80,000 is greater than \$75,000), this court also has jurisdiction with regards to that particular issue.

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

20.) In the year 2009, the plaintiff was very briefly working for Win Kelly Buick Pontiac GMC of Clarksville, Maryland (Howard County, Maryland in which Columbia, Maryland is the county seat and also where Fort Meade and NSA headquarters is located).

21.) Like the case of *West Coast Hotel v. Parrish* which ended the Lochner era of economic due process and laissez-faire economics, the plaintiff could not work very long for Win Kelly Buick Pontiac GMC due to the fact that he was being paid a “draw” or salary which was lower than the minimum wage and was only being paid according to commission without a base salary. The plaintiff could not work for the Central Payment Corporation of Larkspur and San Rafael, California for the same reason that he could not work for Win Kelly Buick Pontiac GMC, i.e. the plaintiff was considered to be an independent contractor or 1099 employee who was not paid a base salary and received no commission. Nevertheless, the plaintiff reached a settlement and/or stipulation with Central Payment Corporation on or around 2014. The Central Payment Corporation would sell Magtek Readers and other credit card processing equipment that would necessarily involve Magnetic Ink Character Recognition (MICR).

22.) The case of *Lochner v. New York* was in 1905 as the same year as Albert Einstein’s “Miracle Year” in his paper on the photoelectric effect and a year before the Alpha Phi Alpha Fraternity, Inc. was formed in upstate New York at Cornell University. The Lochner case of “economic due process” was often combined with the Slaughterhouse Cases involving a monopoly of butchers in Louisiana to form a Constitutional Law doctrine or dogma that involved the Fourteenth Amendment and Equal Protection Clause as it relates to workers and their freedom of contract notwithstanding the similar provisions of National Labor Relations Act (NLRA) or Wagner Act as “New Deal” legislation, collective bargaining agreements (CBA’s), yellow-dog contracts regulated by the Norris-La Guardia Act, and unfair labor practices or ulp’s (not to be confused with upl as unauthorized practice of law) which are grievances that could involve arbitration and the U.S. Department of



Labor National Labor Relations Board (NLRB), Administrative Law Judges or ALJ's, American Arbitration Association (AAA), Federal Arbitration Act of 1925 (FAA), and Alternative Dispute Resolution (ADR) such as in the case of Alex Garcia Enterprises, Inc. (AGE) v. Wells Fargo in U.S. District Court of Northern California.

23.) The plaintiff mailed a letter to Central Intelligence Agency (CIA) Office of Public Affairs while he was working for Win Kelly Buick Pontiac GMC in Clarksville, Maryland and the plaintiff also received an email from george10@ucia.gov about a plaintiff's inquiry about the role of CIA in building the Panama Canal.

24.) Because the CIA was formed in 1947 as Office of Strategic Services (OSS) during the administration of Harry Truman (33rd president and 33rd degree freemason), the response from this employee with the email address george10@ucia.gov was that the Panama Canal had been built before the CIA was formed in 1947.

25.) Accordingly, the Directorate of Operations (DO) for CIA would later become the National Clandestine Service (NCS). The plaintiff was at the Panama Canal in the year 2000 when he visited his girlfriend Edna Carrasco Caballero of Panama City, Panama who the plaintiff traveled with to Colon, Panama in addition to David and Chiriqui in the mountains. The plaintiff first met Edna Carrasco Caballero from "South of the Border" Introductions based in Clearwater, Florida

26.) The plaintiff was in Panama City, Panama as recently as 2015 where he met a woman named Carmen Miranda at the United States Embassy in Panama City, Panama.

27.) To clarify, the plaintiff had to go to the U.S. Embassy in Panama City, Panama because of the fact that he and his friend Edna Carrasco Caballero were having disagreements and Edna no longer wanted the plaintiff to stay at her apartment complex.

28.) With regards to his brief employment at Win Kelly Buick Pontiac GMC of Clarksville, Maryland, the plaintiff learned about the "Driver Information Center", chrome fascia, telescopic steering wheels, and bluetooth technology in which



nowadays many people are able to connect their smartphones (i.e. Androids with an operating system or iPhones with a cloud) to the audio speakers and/or subwoofers/amplifiers in their automobiles. Because basically nobody was buying a Buick Lucerne or Chevy Traverse, the plaintiff had to quit his job although it is more than just a coincidence that the plaintiff met **Kelly Clarkson** at Willard Hotel in Washington, D.C., and worked for Win **Kelly** in **Clarksville**, Maryland (Howard County like Howard Forman of Fort Lauderdale), was married in **Clark County, Nevada**, and there was someone named **Kelly Sabatino** (i.e. “White Sabine/Weird Science/Wayne Sterago/JAWS/Classic Pumps/Ethiopian”) in the plaintiff’s music video for “There She Goes Again” (quoting a Pharcyde song “Passing me by”) which was at Brown University and also featured the model Audrey Demick from Craigslist.

29.) Nevertheless, the plaintiff believes in “good faith” that he was racially-profiled as Al Qaeda as far back as 2001 and 2002 when his Admiralty Law professor looked in the plaintiff’s direction during class and made the comment about someone being “friends with Osama” which of course is a reference to Usama bin Laden of Pakistan who was found during the administration of President Barack Hussein Obama.

30.) In addition, a secretary or administrative assistant at Saint Thomas University School of Law in Miami Gardens, Florida (by Opa Locka Airport ad NW 29th Street and Carol City/Liberty City) was walking by the plaintiff on the law school campus and made a comment asking the plaintiff if he was “down with bin Laden.”

31.) The plaintiff argues that this kind of racism and racial profiling based off of phenotype is unacceptable in today’s world and even in the times of Fred Koermatsu who was a Japanese man that was racially-profiled during World War II and involved in the landmark case of **Korematsu v. United States**.

32.) In addition, to comparing my struggles with being racially-profiled by FBI and CIA to **Korematsu v. United States, supra**, I compare my struggles with these two organizations to the landmark case of **Dred Scott v. Sandford** which involved the 36-30 line and the Missouri Compromise drafted by Henry Clay.

33.) Chief Justice Roger Taney presided over the case of **Dred Scott v. Sandford, supra**, which affirmed the case of **Strader v. Ohio** eve though the military surgeon

Dr. Emerson traveled to Illinois and Wisconsin territory and perhaps emancipated Dred Scott by traveling to Illinois and Fort Snelling in Minnesota from the slave state of Missouri.

34.) History knows that Montgomery Blair argued the case for free for Dred Scott; the plaintiff went to Montgomery Blair High School in Silver Spring, Maryland. Like the landmark case of Roe v. Wade involving Junior Justice Blackmun's opinion, the decision of Dred Scott was also a 7-2 decision as maybe a plurality opinion, majority opinion, or per curiam.

35.) Around the year 2016, the plaintiff was told by his ex-girlfriend Shelly Renee Murray of Henderson, Nevada that he had been racially-profiled as ISIS/ISIL. More specifically, the plaintiff filled out or completed change-of-address cards and the U.S. postal inspector of Henderson, Nevada presumably thought that he had reasonable suspicion or probable cause to racially profile the plaintiff as ISIS/ISIL because his middle name "Satish" sounds Arabic even though the name "Satish" is Hindu and not Arabic. Needless to say, Hinduism is a completely different religion from Islam and Buddhism in which many employees at CIA and FBI characterize Sunni Muslims as the ones most likely to engage in "Jihad" as opposed to Shi'ite Muslims and Kurds. Presumably, they have Sharia Law which is a chauvinistic culture.

36.) Nevertheless, the plaintiff was baptized in the Catholic Church/Vatican even though he was born at a Jewish hospital in Boston, Massachusetts, i.e. Beth Israel Deaconess Hospital which the plaintiff filed a lawsuit against in U.S. District Court of Massachusetts because the plaintiff had Hepatitis C Virus (HCV) for which he was treated with Sovaldi and Ribapak according to a regimen created by Dr. David Liang who worked on Hualapei Road by Summerlin in Las Vegas, Nevada and who sent the plaintiff to Avella or Novella Pharmacy by UMC Medical Center in downtown Las Vegas.

37.) The plaintiff applied for a position of employment as a clandestine agent with Central Intelligence Agency (CIA) at Jacaranda Library in Venice, Florida in 2009 when the plaintiff was living at the Venetian Isles at Capri apartment community off of Capri Isles Boulevard in Venice, Florida.

38.) Although the plaintiff believes that the CIA never confirms or denies

employment, the court can take judicial notice pursuant to Rule 201 of the Federal Rules of Evidence (FRE) that the plaintiff was never formally offered a position of employment with the CIA, i.e. the sole defendant in this litigation.

39.) Furthermore, the plaintiff also applied for a position of employment with National Security Agency (NSA) and Federal Bureau of Investigation (FBI) online at this same library (Jacaranda) in which the plaintiff was trying to be an intelligence analyst or Special Agent with the FBI.

40.) The plaintiff has been to Fort Meade, Maryland as a guest of Allen Cole of the Coast Guard in 2007; Fort Meade is the location of the headquarters of National Security Agency (NSA). The court can take judicial notice pursuant to Rule 201 of Federal Rules of Evidence (FRE) that the plaintiff has communicated with the following email addresses about positions of employment and other matters with CIA and NSA: [kchogan@nsa.gov](mailto:kchogan@nsa.gov), [ljmcwee@nsa.gov](mailto:ljmcwee@nsa.gov), [hlwolfe@nsa.gov](mailto:hlwolfe@nsa.gov), [entertainmentliaison@ucia.gov](mailto:entertainmentliaison@ucia.gov).

41.) Accordingly, the plaintiff has also been to Offutt Air Force Base (AFB) in Omaha, Nebraska, Hill Air Force Base in Salt Lake City, Utah, Fort Riley in Kansas, and Wright-Patterson Air Force Base closer to Dayton and Columbus in Ohio.

42.) The plaintiff was on his way to an ACN convention with Allen Cole of the Coast Guard and his wife Sheila Curry who is the plaintiff's cousin. The plaintiff had been a "team trainer" with ACN and had also litigated against ACN in North Carolina claiming that this company based on the "pyramid sales model" like Amway was running a fraudulent ponzi scheme in which old investors are paid with the money from new investors, i.e. "Other People's Money" (OPM).

43.) Around the year 2003 or 2004, the plaintiff had a conversation with "Faye" from CIA on his way to a Barbri bar review class in Washington, D.C. in which "Faye" mentioned that she knew that the plaintiff was on his way to a bar review course for the Maryland bar examination scheduled at Martin's Crosswinds in Greenbelt, Maryland by Ora Glen Drive, Greenway Endocrinology, Eleanor Roosevelt High School (alma mater of Mya Harrison whom the plaintiff met at a WPGC coat drive in Bowie, Maryland), DuVal High School (alma mater of Karen Allem from "Raiders of the Lost Ark"), and Goddard Space Flight Center (GSFC)

which has a similar acronym to GSC for Girl Scout Cookies sold by attorney Nadine Girault of Tamarac, Florida.

44.) With regards to collateral estoppel and a separate but related issue, pursuant to Rule 201 of the Federal Rules of Evidence (FRE), the court should take judicial notice that the plaintiff is trying to obtain a design patent or utility patent for several ideas related to Dr. Stephen Hawking's quest to solve Unified Field Theory in addition to Grand Unification Theory (GUT) as in Greg Gutfeld of Fox News.

45.) In trying to obtain a design patent or utility patent from the United States Patent and Trademark Office (USPTO) under the Department of Commerce (Cabinet-level agency with former Rhode Island governor Gina Raimondo as Secretary of Commerce), the plaintiff will likely have to fill out a Request for Continued Examination (RCE) in addition to a Continued Prosecution Application (CPA) before obtaining a Notice of Allowance (NOA) not to be confused with the acronym NOAA for the National Oceanic and Atmospheric Administration also under the jurisdiction of the Department of Commerce as a political subdivision.

46.) Furthermore, the plaintiff is trying to submit an International Application (IA) to the World Intellectual Property Organization (WIPO) which oversees intellectual property issues according to the Patent Cooperation Treaty (PCT) and similar provisions of international law such as Trade Related Aspects of Intellectual Property (TRIPS), compulsory licensing of generic pharmaceuticals in Less Developed Countries (LDC's), and the General Agreement on Tariffs and Trade (GATT) as World Trade Organization (WTO) and Bretton Woods agreement and Hague-Visby Amendments.

47.) While obtaining a trademark involves the Lanham Act, obtaining a design patent or utility patent often involves the Office of Initial Patent Examination (OIPE) and Technology Center (TC) and perhaps the application of the landmark intellectual property case of *Diamond v. Chakrabarty* involving a Hindu scientist from General Electric (GE) and the Plant Variety Act or Plant Property Act.

48.) Accordingly, General Electric has been listed on the Dow Jones Industrial Average (DJIA) for over 100 years as the company started by Thomas Edison who

promoted direct current over Nikola Tesla's alternating current (AC) for the Niagara Falls contract involving George Westinghouse and patents ultimately transferred to JP Morgan, i.e. the banking tycoon or magnate who was disciplined by President Theodore Roosevelt who was known as a "trust-buster" by enforcing the Sherman Anti-Trust Act and he was a hero of The Battle of San Juan Hill in Cuba during the Spanish-American War. President Theodore Roosevelt also dismantled the oligopoly or monopoly of Standard Oil owned by John Rockefeller and Andrew Carnegie's steel company although not railroad industry promoted by Cornelius Vanderbilt or automobiles invented by Henry Ford.

49.) Furthermore, General Electric used to be the parent corporation to the subsidiary NBC which is now part of the family of companies such as Comcast, NBC Universal, CNBC, and MSNBC. The CEO of General Electric was Jeffrey Immelt such as Robert Iger and Michael Eisner were CEO's of Disney, i.e. the parent corporation to ESPN and ABC which has the soap opera General Hospital in which the plaintiff's cousin Jennifer Bransford played the role of "Carly."

50.) Nevertheless, the plaintiff is trying to get a design patent or utility patent for the idea that "black holes are connected to white holes by wormholes or Einstein-Rosen bridges" which is similar to Dr. Stephen Hawking's ideas but not quite the same (he declined the knighthood from Queen Elizabeth II of Windsor who is not related to George III who is also a part of American history even though the War of 1812 involved Napoleon Bonaparte).

51.) Furthermore, the plaintiff is trying to get a design patent or utility patent for the idea that all four forces in nature are unified at the gravitational singularity of the supermassive black hole in the region of Sagittarius A\* at the active galactic nucleus (AGN/ACN) at the center of the Milky Way Galaxy. The Earth and solar system are in the Perseus arm of the Milky Way Galaxy far from the active galactic nucleus of Sagittarius A\* in which the Milky Way is a barred spiral galaxy in the Hubble Sequence and Galaxy Morphological Scheme which includes lenticular galaxies and elliptical galaxies in addition to spiral galaxies (not barred) like the Sombrero Galaxy.

52.) Accordingly, the Milky Way, Triangulum Galaxy (Pinwheel Galaxy), and Andromeda (Messier 31) are all barred spiral galaxies that are part of the Local Group (LG like Lou Gossett, Junior and Latin Grammys hosted by Lucero at Madison Square Garden) which is apparently part of the Virgo Cluster, Virgo Supercluster, and Laniakea Supercluster which is connected to Lani Guinier of Harvard University, Local Area Network (LAN), Wide Area Network (WAN), National Intelligence Estimate (NIE), and Wannie Davis of Bradenton, Florida with whom the plaintiff would go to Bradenton Beach or Lido Beach by Saint Armand's Circle or Saint Armand's Key and with whom the plaintiff would go to the movie theater by Lockwood Ridge and University Drive in Sarasota, Florida on the opposite side of the Redbox located at the CVS and 7-11 at the corner of Lockwood Ridge and SR-70.

53.) The plaintiff is drawing a comparison between the intersection of Lockwood Ridge and SR-70 in Sarasota, Florida (Manatee County by Natalee Road in Braden River) to the intersection of Green Valley and Sunset in Henderson, Nevada where there is a Green Valley Library and an obelisk as a Masonic symbol and perhaps a compression member substantially similar to Trajan's Column and Washington Monument in terms of architecture and civil engineering.

54.) The plaintiff is also comparing these intersections i Sarasota, Florida and Henderson, Nevada to Red Light Management since the plaintiff is a fan of Amy Lee of Evanescence and she is managed by Red Light Management.

55.) Furthermore, the plaintiff is comparing the intersection of Halfway Boulevard and Lincoln Road in Hagerstown, Maryland to the Church of Hagia Sophia (GNostic Sophia/Mary Magdalene/Athena Goddess of Wisdom/Demiurge/Irenaeus/Nag Hammadi Library/Gospel of Thomas/Apocalypse of Peter) in Istanbul, Turkey which used to be the ancient cities of Constantinople (founded by Constantine the Great son of COnstantius Chlorus who ended the Tetrarchy by defeating Maxentius son of Maximian at the Battle of Milvian Bridge) and Byzantium connected to the Byzantine Empire and Holy Roman Empire of Hapsburgs in Austria. During the Tetrarchy of Constantine, Galerius, Licinius, and Maxebtius, Constantine the Great formed th Edict of Milan for religious toleration of Christians connected to Shroud of Turin, Italy. The Roman



Tetrarchy was started by Diocletian and was completely different from “Year of the Four Emperors” involving Nerva and Galba after the Flavian Dynasty of Titus, Domitian, and Vespasian which followed the Julio-Claudian Dynasty of Octavian (Augustus), Tiberius, Claudius, Nero (sociopath and megalomaniac who tortured Christians), and Caligula (sociopath and megalomaniac). Octavian was the first emperor of Rome as “Augustus” by defeating Cleopatra and Mark Antony at Battle of Actium in which Cleopatra was part of the Ptolemaic Dynasty of Greeks in Egypt as descendants of Alexander the Great in the same manner that the plaintiff is a descendant of John A. Moss, i.e. the Captain of the Battle of Gettysburg as a runaway slave from Fauquier County, Virginia.

56.) There is a legendary account according to historians (not Herodotus or Manetho) that Cleopatra was hiding in a “magic carpet” or perhaps a Persian rug when she visited Julius Caesar who was part of the Triumvirate with Pompey and Crassus and who William Shakespeare described as being opposed by Brutus and Cassius of the Roman Senate before the Roman Empire, Praetorian Guard, and Praetorian Prefect.

57.) After the Battle of Actium, Cleopatra was captured and paraded before Rome by Augustus and she was able to hide a venomous snake as an asp (not a King Cobra, rattlesnake, crait, or inland taipan of Australia) in her prison cell where she was being held.

58.) The plaintiff believes that Cleopatra is connected to the phrase “COLE WMA” mentioned by Judge Michael Anello of Southern California in his final opinion in the plaintiff’s litigation against Wells Fargo Bank in Southern California which is also similar to the plaintiff’s Northern Texas litigation against Wells Fargo Bank.

59.) The plaintiff believes that Cleopatra is connected to the phrase “COLE WMA” because of the fact that “COLE” is an anagram of “CLEO” as in Miss Cleo of Jamaican ancestry or Cleopatra and that “COLE WMA” is an acronym for “Concentrate on Leaving Earth with me Again” similar to “ET Phone Home” from Stephen Spielberg’s famous movie; he was also the director for Amistad (based off of the Naval capture of “The Antelope” in 1825) and Indiana Jones movies which



ae featured at Disney World in Orlando, Florida and Disney Land in Anaheim, California.

60.) The determinant of a Jacobian Matrix refers to the intersection of Halfway Boulevard and Lincoln Avenue in Hagerstown, Maryland where there is a Walgreen's on one corner, a PNC Bank on another corner, a BB&T Bank (now Truist) on a third corner, and a Catholic church on a fourth corner which is down the street from a corn field (crop circles) connected to corn field in Iowa City, Iowa.

61.) Warren Moon is the determinant of a Jacobian Matrix involving the following four quarterbacks, the 39-yard line at Fedex Field and RFK Stadium; and November 18th of 1985: Joe Theisman, Alex Smith, Michael Vick (Atlanta Falcons/Birdhead/Larry Birkhead), and Lamar Jackson (Baltimore Ravens/Birdhead/Larry Birkhead)

**V.) COUNT ONE: INTENTIONAL INFLECTION OF EMOTIONAL  
DISTRESS (IIED)**

62.) The plaintiff argues that the sole defendant CIA committed the intentional infliction of emotional distress (IIED) by racially-profiling the plaintiff as Al Qaeda and ISIS/ISIL without any reasonable suspicion or probable cause other than the fact that the plaintiff's middle name is "Satish" which is Hindu and not Arabic. Furthermore, the plaintiff argues that the Exclusionary Rule, Fourth Amendment, Fruit-of-the-Poisonous-Tree Doctrine, and Attenuation DOctrine preclude the CIA, NSA, or FBI from racially-profiling the plaintiff any further after this litigation seeking a declaratory judgment.

**VI.) COUNT TWO: INVASION OF PRIVACY THROUGH INTRUSION  
UPON SECLUSION**

63.) The plaintiff argues that the sole defendant CIA committed the invasion of privacy through intrusion upon seclusion by racially-profiling the plaintiff as Al Qaeda and ISIS/ISIL without any reasonable suspicion or probable cause other than the fact that the plaintiff's middle name is "Satish" which is Hindu and not

Arabic. Furthermore, the plaintiff argues that the Exclusionary Rule, Fourth Amendment, Fruit-of-the-Poisonous-Tree Doctrine, and Attenuation Doctrine preclude the CIA, NSA, or FBI from racially-profiling the plaintiff any further after this litigation seeking a declaratory judgment.

**VII.) COUNT THREE: INVASION OF PRIVACY THROUGH MISAPPROPRIATION**

64.) The plaintiff argues that the sole defendant CIA committed the invasion of privacy through misappropriation by racially-profiling the plaintiff as Al Qaeda and ISIS/ISIL without any reasonable suspicion or probable cause other than the fact that the plaintiff's middle name is "Satish" which is Hindu and not Arabic. Furthermore, the plaintiff argues that the Exclusionary Rule, Fourth Amendment, Fruit-of-the-Poisonous-Tree Doctrine, and Attenuation Doctrine preclude the CIA, NSA, or FBI from racially-profiling the plaintiff any further after this litigation seeking a declaratory judgment.

**VIII.) COUNT FOUR: INVASION OF PRIVACY THROUGH FALSE LIGHT**

65.) The plaintiff argues that the sole defendant CIA committed the invasion of privacy through "false light" by racially-profiling the plaintiff as Al Qaeda and ISIS/ISIL without any reasonable suspicion or probable cause other than the fact that the plaintiff's middle name is "Satish" which is Hindu and not Arabic. Furthermore, the plaintiff argues that the Exclusionary Rule, Fourth Amendment, Fruit-of-the-Poisonous-Tree Doctrine, and Attenuation Doctrine preclude the CIA, NSA, or FBI from racially-profiling the plaintiff any further after this litigation seeking a declaratory judgment.

**IX.) COUNT FIVE: NEGLIGENCE**

66.) The plaintiff argues that the sole defendant CIA committed negligence by racially-profiling the plaintiff as Al Qaeda and ISIS/ISIL without any reasonable suspicion or probable cause other than the fact that the plaintiff's middle name is

“Satish” which is Hindu and not Arabic. Furthermore, the plaintiff argues that the Exclusionary Rule, Fourth Amendment, Fruit-of-the-Poisonous-Tree Doctrine, and Attenuation DOctrine preclude the CIA, NSA, or FBI from racially-profiling the plaintiff any further after this litigation seeking a declaratory judgment.

**X.) COUNT SIX: THE WRONGFUL INSTITUTION OF LEGAL PROCEEDINGS/MALICIOUS PROSECUTION**

67.) While this cause of action is being brought in Washington, D.C., it should be stated with substantial certainty that the tort laws are very similar in all 50 states and Washington, D.C.. As such, it should be noted that the state of Arizona first recognized a claim for civil malicious prosecution in 1932. See Ackerman v. Kaufman, 41 Ariz. 110, 112-114, 15 P.2d 966, 967 (1932).

68.) While often called malicious prosecution, that term actually applies to the criminal context, and the proper term in the civil context is the wrongful institution (or use) of legal proceedings. See Bradshaw v. State Farm Mut. Auto. Ins. Co., 157 Ariz. 411, 414 n.1, 758 P.2d 1313, 1316 n.1(1988); Smith v. Lucia, 173 Ariz. 290, 291 n.1, 842 P.2d 1303, 1304 n.1 (Ct. App. 1992).

69.) The wrongful institution of legal proceedings “is a cause of action not favored by the law.” Nataros v. Superior Court, 113 Ariz. 498, 500, 557 P.2d 1055, 1057 (1976).

70.) To prove a claim for wrongful institution of civil proceedings, the plaintiff must prove the defendant: (1) instituted a civil action (2) without probable cause (3) that was motivated by malice, (4) terminated in the plaintiff’s favor, and (5) damaged the plaintiff. See Bradshaw, 157 Ariz. at 416-17, 758 P.2d at 1318-19 (citing Carroll v. Kalar, 112 Ariz. 595, 596, 525 P.2d 411, 412 (1976)). See also RAJI (Civil), 5th Intentional Torts 19 (Malicious Prosecution) (citations omitted).

71.) Because of the fact that the plaintiff is African-American, it can be stated with substantial certainty that he is a member of a suspect classification of discrete and

insular minorities which have suffered invidious discrimination within the context of American jurisprudence.

72.) As such, any federal, state, or local laws/regulations (restricting the plaintiff from being on the ballot in this particular state for the primary and general election (assuming that the CIA plays a large role in monitoring the election process in 2020 and beyond) and profiling the plaintiff as an Arab, Middle Easterner, or Muslim) must pass a strict scrutiny test as opposed to an intermediate scrutiny test or rational basis test.

73.) More specifically, the burden of proof and persuasion rests squarely with the sole defendant CIA to show by a preponderance of the evidence that any federal, state, or local laws (restricting the plaintiff from being placed on the primary and general election ballot in this state (and assuming the FBI plays a large role in monitoring the elections process in 2020 and beyond) and racially-profiling the plaintiff as an Arab, Middle Easterner, or Muslim) applying to the plaintiff must be “narrowly-tailored to a compelling government objective.” (rather than the lower level of being “rationally-related to a legitimate government objective in which the burden of proof and persuasion rests squarely with the plaintiff).

74.) The plaintiff argues that the sole defendant CIA committed the wrongful institution of legal proceedings and/or malicious prosecution by racially profiling the plaintiff as an Arab, Middle Easterner, or Muslim around 2001 when the plaintiff is a Catholic, African-American from the Washington, D.C. area. Furthermore, it would also be an Equal Protection violation to subject the plaintiff to counterintelligence or COINTELPRO or get a FISA warrant simply because the

plaintiff had a Cuban fiance in 1999 named Rachel Garcia or to consider the plaintiff to be a “person of interest” in the same investigation involving Steven Hatfill’s harassment lawsuit against the FBI when the plaintiff was merely an apprentice or intern at NIH/NHLBI/DHVD working under the supervision of Dr. Cynthia Dunbar and Dr. John Tisdale. The court can take judicial notice that the plaintiff does not mind or is not offended by the possible prospect of being an “intelligence subject” to at least one American intelligence agency such as CIA, DIA, NSA, or NRO. The court can also take judicial notice that the plaintiff can not prove with substantial certainty or by a preponderance of the evidence that he is in fact an “intelligence subject” as such a burden of proof and/or persuasion would be almost insurmountable whereby a scintilla of evidence would seem to be sufficient and/or clear and convincing evidence if not evidence beyond a reasonable doubt.

75.) The plaintiff argues that the sole defendant has committed the wrongful institution of legal proceedings or malicious prosecution even though the plaintiff has never been indicted before a grand jury or by information by a U.S. attorney, district attorney, or attorney general because of the fact that “racial profiling” a black man as an Arab or Muslim is enough to commence an action for the tort of the wrongful institution of legal proceedings and/or malicious prosecution.

#### **XIV.) PRAYER FOR RELIEF**

WHEREFORE, it is absolutely essential that the plaintiff communicate to the court in the present case at bar that he is first and foremost seeking declaratory relief and/or a declaratory decree in which the court simply clarify for PACER and

CM/ECF what the legal issues are regarding the facts that the plaintiff has alleged. To clarify, the plaintiff has been declared to be a vexatious litigant or perhaps “eggshell plaintiff” in a few jurisdictions nationwide which the plaintiff believes is an inaccurate portrayal of his desire to be a zealous advocate on behalf of his own Civil Rights and to be an outstanding law-abiding citizen. However, both the Honorable Virginia Hernandez-Covington (of the U.S. District Court of Middle Florida) and the Honorable Judge Robin Rosenbaum of the Eleventh Circuit Court of Appeals in Atlanta, Georgia (sitting en banc with at least two other judges) have characterized the plaintiff’s pleadings as “quintessential shotgun pleadings” and the Honorable Judge Thomas Barber of Tampa, Florida has declared the plaintiff to be a vexatious litigant (who supposedly files frivolous litigation) in that jurisdiction. In addition to seeking a declaratory judgment/decree from the court in the present case at bar, the plaintiff is also requesting a remedy at law in the form of a judgment in the amount of \$80,000 (eighty thousand dollars). This remedy at law would be appropriate considering the fact that the sole defendant Central Intelligence Agency (CIA) and its previous directors have committed the wrongful institution of legal proceedings/malicious prosecution, gross negligence, the intentional infliction of emotional distress (IIED), and invasion of privacy through “intrusion upon seclusion” and “false light.” Moreover, the sole defendant Central Intelligence Agency (CIA) committed a violation of the following “black-letter law” provisions of federal law: 42 U.S.C. Section 1983, Title VII of the Civil

Rights Act of 1964, and the Americans with Disabilities Act of 1990 (ADA).

Furthermore, the sole defendant Central Intelligence Agency (CIA acting on behalf of the executive branch of the federal government and its previous directors including the Director of National Intelligence (DNI)) has violated the Equal Protection Clause and Due Process Clause of the Fifth and Fourteenth Amendments to the U.S Constitution in addition to having violated the Privileges and Immunities Clause of Article IV, Section 2, Clause 1 of the U.S. Constitution, the Fourth Amendment rights to a “reasonable expectation of privacy” (see Katz v. United States, supra) and perhaps invoking a broad assertion and interpretation of the Eighth Amendment right to be free from cruel and unusual punishment. In asserting this “prayer for relief,” the plaintiff states, avers, and alleges the following:

A.) The remedy at law in the form of a judgment in the amount of \$80,000 (eighty thousand dollars) would also be appropriately considered to be punitive, compensatory, treble, actual, presumed, and special damages for the defendants’ commission of the wrongful institution of legal proceedings/malicious prosecution, negligence (or negligence per se) in addition to a violation of the following “black-letter law” provisions of federal law: 42 U.S.C. Section 1983, Title VII of the Civil Rights Act of 1964, and the Americans with Disabilities Act of 1990 (ADA).



B.) The remedy at law in the form of a judgment in the amount of \$80,000 would also be considered appropriate given that it has been proved that the sole defendant Central Intelligence Agency (CIA) has violated the plaintiff's rights with regards to the Equal Protection Clause and Due Process Clause (inherent from the Fifth and Fourteenth Amendments) and the Privileges and Immunities Clause (of Article IV, Section 2, Clause 1) in addition to the Fourth Amendment right to a reasonable expectation of privacy and perhaps the Eighth Amendment right to be free from cruel and unusual punishment.

C.) The plaintiff is also requesting the equitable remedy of an injunction or specific performance mandating that the defendant Central Intelligence Agency (CIA) have to "cease and desist" conducting surveillance and/or COINTELPRO on the plaintiff given that he is a Catholic, African-American from Washington, D.C. who was merely an intern and/or apprentice at NIH/NHLBI/Division of Hematology (under Dr. Cynthia Dunbar and Dr. John Tisdale) and that the plaintiff is not a Middle Easterner, Arab, or Muslim from a foreign country such as Saudi Arabia, Qatar, Iraq, Syria, Iran, Oman, and is certainly not involved in any crisis involving Houthis who are involved in a conflict between Saudi Arabia and Iran and is not associated with the Palestinian Liberation Organization (PLO) led by Mahmoud Abbas or any similar organizations such as Hezbollah or Hamas.

D.) With regards to the plaintiff requesting the equitable remedy of an injunction or specific performance mandating that the defendant Central Intelligence Agency

(CIA) have to “cease and desist” conducting surveillance and/or COINTELPRO on the plaintiff given that he is a Catholic, African-American from Washington, D.C. who was merely an intern and/or apprentice at NIH/NHLBI/Division of Hematology (under Dr. Cynthia Dunbar and Dr. John Tisdale), the court should take judicial notice that even though the plaintiff does not mind the possibility of being an “intelligence subject” with at least one American intelligence agency, the whole idea that a FISA warrant should be issued against plaintiff is preposterous given that the plaintiff no longer has a Cuban fiance named Rachel Garcia or Magna Gargallo Perez and also because neither Rachel Garcia nor Magna Perez are “intelligence assets” for CIA, DIA, NSA, etc. (indicating that they are merely normal civilians who had to endure the intense restrictions of the Cuban government of Fidel and now Raul Castro).

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ronald Satish Emrit". The signature is fluid and cursive, with the first name "Ronald" being the most prominent.

Ronald Satish Emrit

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