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6 By: John Thomas Christiana, Pro Se

7 SUPERIOR COURT OF THE STATE OF ARIZONA  
8 FOR THE COUNTY OF MARICOPA

9 JOHN THOMAS CHRISTIANA,

10 Plaintiff,

11 vs.

12 WINTER OWEN CALVERT, TARGETED  
13 JUSTICE, DORIS CLAUSE, AND DOES 1  
14 THROUGH 10 INCLUSIVE,

15 Defendants.

) CASE NO.: CC2020024852-RC  
) [Honorable Judge Craig Wismer]

) FIRST AMENDED COMPLAINT FOR  
) DAMAGES AND INJUNCTIVE RELIEF

1. BREACH OF BOARD OF DIRECTOR DUTY.
2. DEFAMATION.
3. UNLAWFUL TERMINATION.
4. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (IIED).
5. NEGLIGENCE.
6. INJUNCTIVE RELIEF TO STOP DEFENDANTS' THREATS AND CRIMES RELATED TO TERRORISM.
7. DECLARATORY RELIEF TO STOP DEFENDANTS' THREATS AND CRIMES RELATED TO TERRORISM

) [Filed Concurrently with Notice of Motion and  
) Motion for Leave to File First Amended  
) Complaint]

) COMPLAINT FILED: Feb. 6, 2020  
) TRIAL DATE: None Set  
) PRETRIAL CONFERENCE: June 18, 2020  
) TIME: 10:00 AM

) DEMAND FOR JURY TRIAL

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24 NOW COMES PLAINTIFF John Thomas Christiana with his First Amended Complaint and  
25 alleges information and belief as follows:

26 I.

27 INTRODUCTION

- 28 1. Plaintiff John Thomas Christiana (hereinafter "Plaintiff") hereby submits this First

1 Amended Complaint against Defendants' Winter Owen Calvert, Doris Clause, and Targeted  
2 Justice, (collectively "Defendants") for Breach of Board of Director Duty, Defamation, Unlawful  
3 Termination, Intentional Infliction of Emotional Distress (IIED), Negligence, Declaratory Relief  
4 to Stop Defendants crimes related to terrorism, and an Injunction Order to stop Harassment by  
5 Association of Defendants Threats and Crimes related to terrorism.

6 2. Winter Owen Calvert commonly uses the alias Richard Lighthouse. Doris Clause  
7 commonly uses the alias Midge Mathis.

8 3. Defendant Winter Owen Calvert ("Defendant Calvert"), using alias Richard Lighthouse,  
9 of Targeted Justice posts on the internet soliciting his audience to engage in federal crimes  
10 related to terrorism. Then he tells his audience that they are on the Federal Bureau of  
11 Investigation ("FBI") terrorist watchlists including the "Terrorist Screening Center" ("TSC") and  
12 National Counterterrorism Center ("NCTC"). These Targeted Justice members and innocent  
13 victims that call themselves "Targeted Individuals" that are associated with Targeted Justice are  
14 likely unknowingly putting themselves on the terrorist watch list by their association with  
15 Targeted Justice.

16 4. Defendant Calvert targets his audience (Targeted Individuals) trying to get them to do  
17 crimes related to terrorism (and putting them on the terrorist watchlist) by telling them the FBI  
18 terrorist watchlists are actually "intake" systems *for them* (Targeted Individuals). Defendant  
19 Calvert wrote to his targeted audience:

20 "the Targeted Individual (TI) Program can be shut down by paralyzing the intake  
21 system (new TI's) with a flood of bad information. The NCTC and the TSC hold the  
22 databases where the new entrants are catalogued." "The FBI is apparently anxious to  
23 receive new TI's. The FBI and DHS even have groups with "production quotas."  
24 It would be very difficult to argue that this is not a federal crimes related to terrorism.  
25 This is dangerous not only to the United States but also to the people that listen to and  
26 follow Defendants Owen Calvert, alias Richard Lighthouse, and Targeted Justice.

27 5. If that was not enough for Defendants to discredit its members and the community, in  
28 addition, Defendants Owen Calvert, alias Richard Lighthouse, and Targeted Justice are also  
threatening and intimidating government employees by posting their home addresses and telling  
his listeners these government employees are responsible for crimes to them. Defendants have  
repeatedly told their listeners and followers that this conduct is legal, but it is not. Defendant  
Calvert tells his listeners that posting home addresses is legal, but fails to tell them the second  
part of the sentence, that it is not legal if you do it to threaten or intimidate the government



1 employee. It is a win-win for Defendants to hurt everyone, but it is a lose-lose for both  
2 government employees and the Targeted Justice members. Everyone is a victim to Defendants'  
3 targeting their victims with misinformation. Defendants also list the family names including  
4 children, mothers, fathers, sisters and brothers.

5 6. If anyone had to stand up to Defendants, that would be the Legal Director and member on  
6 the Board of Directors. That was Plaintiff Christiana. Plaintiff did not want Targeted Justice, a  
7 civil rights organization, associated with criminal threats for obvious legal and appearance  
8 reasons. Defendant Calvert has posted this information on multiple websites including Targeted  
9 Justice. Defendant Clause (Using alias Midge Mathis) supports Calvert and goes on radio talk  
10 shows to peddle these crimes and praises Calvert (alias Lighthouse) to whoever will listen.

11 7. Whoever follows or heeds the recommendations of Defendants Calvert, Clause, and  
12 Targeted Justice can not only get in criminal trouble, but they are discredited. Defendants also  
13 further discredit the community with disinformation, unproven research and bad advice, making  
14 Targeted Justice a risky organization and discrediting Targeted Justice to the courts, law firms,  
15 politicians, the media, and the public at large. Who would make a donation to a non-profit  
16 organization like this, or want to work with or help an organization that is intimidating or  
17 threatening families, and also involved with or associated with crimes related to terrorism? This  
18 was a Breach of Board of Director duty.

19 8. This behavior by Defendants was making it more difficult for Plaintiff Christiana and the  
20 rest of the team to get donations, find attorneys to work with, get meetings with politicians, and  
21 get positive media coverage. This behavior by Defendants could put Plaintiff and the members of  
22 Targeted Justice on a terrorist watchlist or another watchlist. This is Intentional Infliction of  
23 Emotional Distress and Negligence.

24 9. Plaintiff Christiana wrote many emails to the Targeted Justice team and board of  
25 directors advising them of the risk being presented. Plaintiff Christiana then wrote multiple  
26 "official memos" to the team and board of directors advising them of the risk being presented.  
27 Defendants' risky and criminal behavior only got worse. Defendant Clause in fact rewarded  
28 Defendant Calvert for his unacceptable conduct and was not happy with Plaintiff Christiana  
addressing these issues. The relationship between Plaintiff and Defendants was terminated by  
Defendants. This was unlawful termination.

10. Plaintiff Christiana, as the Legal Director and on the Board of Directors, protected the

1 rest of the Targeted Justice Board of Directors, team, members and community from being put  
2 on a terrorist watchlist or some other watchlist and fulfilled his legal and ethical duty by  
3 reporting this behavior to law enforcement.

4 11. Then weeks later Plaintiff Christiana, fulfilled his fiduciary and ethical duty by reporting  
5 this behavior to the Targeted Justice members and community. Defendants, wanting to continue  
6 targeting and hurting the community, responded by publishing to the public and community that  
7 Plaintiff is wrong and misrepresenting Defendants. This impeached Plaintiff's honesty, integrity,  
8 and reputation and is libelous per se. Defendants have continued and are continuing this behavior  
9 of libel, threats, and crimes related terrorism, up to the date of this writing, May 15, 2020.

## 10 II.

### 11 THE PARTIES

12 12. Plaintiff John Thomas Christiana is, and at relevant times, a resident of the County of San  
13 Bernardino, State of California.

14 13. Upon information and belief, Defendant Winter Owen Calvert was, and at relevant times,  
15 on the Board of Directors of Targeted Justice, an Arizona non-profit corporation located in the  
16 City of Peoria, County of Maricopa, State of Arizona.

17 14. Upon information and belief, Defendant Targeted Justice is, and at relevant times, an  
18 Arizona non-profit corporation located in the City of Peoria, County of Maricopa, State of  
19 Arizona.

20 15. Upon information and belief, Defendant Doris Clause is, and at relevant times, on the  
21 Board of Directors of Targeted Justice, an Arizona non-profit corporation located in the City of  
22 Peoria, County of Maricopa, State of Arizona.

23 16. The true names and capacities of defendants sued in this Complaint as Does 1 through 10,  
24 inclusive, and therefore sues these defendants by fictitious names.

25 17. Plaintiff is informed and believes, and on that basis alleges, that each defendant was in  
26 some manner responsible for the acts and damages alleged herein, and/or are indebted to Plaintiff  
27 as alleged herein, and that each defendant participated in the acts alleged herein.

## 28 III.

### JURISDICTION AND VENUE

18. This Court has jurisdiction over all causes of action and claims for relief asserted herein



1 because all causes of action and claims for relief asserted herein arise out of the conduct  
2 undertook by Defendants residing in the County of Maricopa, State of Arizona or were on the  
3 Board of Directors of a corporation registered in the County of Maricopa, State of Arizona,  
4 under the laws of the State of Arizona, and at least one of the Defendants resides in the County  
5 of Maricopa, State of Arizona. Each Defendant has sufficient minimum contacts with the State of  
6 Arizona, is a citizen of the State of Arizona, or otherwise intentionally availed itself of the State  
7 of Arizona so as to render the exercise of jurisdiction over it by the State of Arizona courts  
8 consistent with traditional notions of fair play and substantial justice. In Arizona, personal  
9 jurisdiction may be granted under their long-arm statute because libel and defamation torts “are  
generally held to occur wherever the offending material is circulated.”

10 19. Venue is proper in this Court under the Arizona Revised Statutes §12-401 because  
11 Defendants reside in the County of Maricopa, State of Arizona, or meet an exception to have this  
12 complaint filed in the County of Maricopa, State of Arizona because the injury and liabilities to  
13 which Defendants are subject arise in County of Maricopa, State of Arizona. As two Defendants  
14 reside in the County of Maricopa, State of Arizona, then Arizona Revised Statutes §12-401  
15 includes “When there are several defendants residing in different counties, action may be  
16 brought in the county in which any of the defendants reside” and “When the foundation of the  
17 action is a crime, offense or trespass for which an action in damages may lie, the action may be  
18 brought in the county in which the crime, offense or trespass was committed or in the county in  
which the defendant or any of the several defendants reside or may be found.”

#### 19 IV.

#### 20 TIME FOR ACTION

21 20. Plaintiff timely filed the initial complaint on February 6, 2020 within the one year statute  
22 of limitations. All causes of action have a one year or longer statute of limitations. Per Arizona  
23 Justice Court Civil Procedure Rule 115, “In calculating any period of time specified or allowed  
24 by these rules, by any local rules, by order of a court, or by any applicable statute, the day of the  
25 act or default from which the designated period of time begins to run is not included.” All causes  
26 of action are within one year. In filing the First Amended Complaint, Arizona Justice Court  
27 Rules of Civil Procedure Rule 119 states that “upon a party's motion, the court may permit the  
28 filing of an amended pleading at any stage of the proceeding and on terms that are just. Leave to  
amend must be freely given when justice requires.” Further, the Rules of Civil Procedure for the

1 Superior Courts of Arizona Rule 15(a)(2) also allows for amended pleadings stating that leave to  
2 amend must be freely given when justice requires.

3 **V.**

4 **STATEMENT OF FACTS**

5 21. In the fall of 2017, Plaintiff was invited by Doris Clause, also known as Midge Mathis,  
6 (“Defendant Clause”) to join a non-profit civil rights organization. The inaugural meeting of  
7 about ten people, including Plaintiff and Defendants, was in Winnsboro, Texas from about  
8 December 15, 2017 to December 18, 2017, where the mission and goals were discussed. The  
9 organization name was voted on and decided to be called “Targeted Justice.” Because Plaintiff  
10 had legal and law school experience, Plaintiff was asked to be the Targeted Justice Legal  
11 Director. Soon after, Plaintiff was put on the Board of Directors.

12 22. Throughout 2018, the Targeted Justice team communicated by phone, e-mail, Facebook  
13 and messenger. Christiana and Clause would speak on the phone almost every day. The second  
14 in-person team meeting was March 30, 2018 to April 3, 2018 near Colorado Springs, Colorado.  
15 Plaintiff felt the entire team should be in attendance, but was outvoted by Defendants so the rest  
16 of the team and board of directors were not invited. Only three people attended this meeting -  
17 that were considered the core of Targeted Justice - Plaintiff Christiana and Defendants Calvert  
18 and Clause. Plaintiff said he will advise the rest of the team but Defendant Calvert said he would  
19 do so it, but he did not.

20 23. The third team meeting was June 1, 2018 to June 6, 2018 near Albuquerque, New  
21 Mexico. Again, most of the team and board of directors were not invited as that was the decision  
22 of Defendants. Here only four people attended - that were considered the core - Plaintiff  
23 Christiana and Defendants Calvert and Clause – and one other attended this meeting.

24 24. The fourth team meeting was from December 1, 2018 to December 4, 2018 on the coast  
25 in Rockaway Beach, Oregon. This time team members were invited but Defendant Clause was  
26 not happy with Defendant Calvert so Calvert was not invited nor was he informed there would be  
27 a team meeting. This likely angered Defendant Winter Owen Calvert as his behavior changed.

28 25. In addition, there was a huge development that happened at this team meeting. On  
December 4, 2018, the majority of the Targeted Justice Board of Directors, present in quorum,  
voted to deny Defendant Calvert’s (alias Richard Lighthouse) request to involve Targeted Justice  
with a “demand letter” that Calvert wanted to write to General John W. Raymond, commander of



1 the Air Force Space Command, headquartered in Colorado Springs, Colorado. The reason for the  
2 denial was that Defendant Calvert had written an e-book titled "Treason at the Air Force Space  
3 Command" with General John W. Raymond's picture on the cover and this e-book has upwards  
4 to 30 federal felonies in it. Defendant Calvert accused and stated as fact that about 14 air force  
5 officers are guilty of crimes to them - his audience - and he lists the air force officers' home  
6 addresses and family names including children, mothers, fathers, sisters and brothers. This is a  
7 violation of federal law, 18 U.S. Code § 119, "Protection of individuals performing certain  
8 official." This was of timely importance as there were recent talk shows where this particular e-  
9 book was being promoted, and Plaintiff Christiana, as Legal Director and on the Board of  
10 Directors, did not want Targeted Justice, a civil rights organization, associated with criminal  
11 threats for obvious legal and appearance reasons. This e-book was and is readily available on the  
12 internet at Defendant Calvert's personal website, RLighthouse.com, his Amazon account, and his  
13 Smashwords account, although Smashwords, an online publishing organization, has since taken  
14 Defendant Calvert's account down.

15 26. In defiance of the Board vote, Defendant Calvert sent the demand letter anyway.  
16 Defendant Calvert's postings on the Targeted Justice website were now more scrutinized and it  
17 was now more readily apparent of the disinformation, unproven research and risky, bad advice  
18 that Defendant Calvert was posting in the name of Targeted Justice. Defendant Calvert was  
19 posting on the Targeted Justice website and sending out e-mails of unproven information that he  
20 called "research." It should be noted Defendant Calvert's "eBooks" have three chapters: 1)  
21 Introduction; 2) Conclusions; and 3) References, which are loaded with links from his websites.  
22 Calvert made unfounded claims that further discredited Targeted Justice, its board of directors,  
23 and members. When Plaintiff Christiana and others asked Defendant Calvert for the research or  
24 patents, Calvert responded by belittling and mocking the person that asked, without providing  
25 any research that was requested.

26 27. Plaintiff Christiana was now advising the Targeted Justice Board of Directors and team  
27 about these concerns and was trying to return Targeted Justice back to respectability. It appeared  
28 that Defendant Calvert was making Targeted Justice a risky organization and discrediting  
Targeted Justice to the courts, law firms, politicians, the media, and the public at large. This  
behavior by Defendants was making it more difficult to get donations, find attorneys to work  
with, get meetings with politicians, and get positive media coverage.

1 28. As the legal director, Plaintiff sent out three - official – emails on January 6, 2019,  
2 January 10, 2019, and on January 16, 2019 to the Targeted Justice board and team advising them  
3 of the risk being presented to the Targeted Justice organization and its members.

4 29. But it got worse, much worse. Then the criminal activity of Defendant Winter Owen  
5 Calvert, under his pseudonym Richard Lighthouse, upped to terrorism level on January 25, 2019.  
6 Plaintiff Christiana was advised of an email and e-book by Defendant Calvert where Calvert was  
7 publically advising the viewer to submit false information to the government - falsely  
8 representing themselves - to paralyze the official FBI terrorism watchlist that was started after  
9 the 9-11 terrorist attacks. There are two that Defendant Calvert is attacking. One is called the  
10 Terrorist Screening Center (TSC) on the FBI website and the other is called the National  
11 Counterterrorism Center (NCTC). The NCTC is a United States government organization  
12 responsible for national and international counterterrorism efforts. The words that Defendant  
13 Calvert used were to make the TSC “useless and a joke.” This is on public websites. How could  
14 this not be considered a federal crime related to terrorism?

15 30. Plaintiff Christiana was outraged by Defendant Calvert’s criminal conduct as well as  
16 associating Targeted Justice with this conduct, and further, compromising Targeted Justice and  
17 its members. Hours after learning about this recent activity related to terrorism by Defendant  
18 Calvert, on January 25, 2019, Plaintiff Christiana sent an email to the Targeted Justice Board of  
19 Directors and said:

20 **“I am requesting an EMERGENCY Targeted Justice Board of Directors**  
21 **meeting.** TODAY. Must be today. This is not just bad for the character and reputation of  
22 Targeted Justice – and each one of us especially on the Board of Directors, this is  
23 criminal. This is very dangerous.”

24 31. The language above is verbatim including verbatim capital letters, bold and underline.  
25 Then Plaintiff asked Defendants by phone and email to remove this information off the internet  
26 or Plaintiff will contact the FBI and law enforcement. Defendant Owen Calvert responded a day  
27 later that he refuses. Defendant Owen Calvert said he will continue. Plaintiff asked again by  
28 email to Defendants (and copied the Board of Directors and team) that Plaintiff will contact the  
FBI and law enforcement if Defendant Calvert does not take these threats and crimes off the

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1 internet. Defendants did not respond. On January 31, 2019<sup>1</sup>, Plaintiff called the Federal Bureau  
2 of Investigations (“FBI”) to report this activity.

3 32. It was very clear that Defendants were not planning to remove the criminal conduct off  
4 the public internet and Defendants were going to continue this conduct and likely further this  
5 conduct. Not only was this hurting the United States of America, but also Targeted Justice  
6 members and innocent victims associated with Targeted Justice that would unknowingly be put  
7 on the terrorist watch list. Therefore on February 6, 2019, Plaintiff then followed up and sent an  
8 email to the FBI offices reporting this alleged criminal behavior and crimes related to terrorism.

9 33. On February 6, 2019, Defendants sent Plaintiff an email that he needs to be removed off  
10 the Targeted Justice Board of Directors specifically stating the reason and the only reason was  
11 due to Plaintiff reporting Defendant Winter Owen Calvert, alias Richard Lighthouse, to the FBI.

12 34. On February 26, 2019, Plaintiff fulfilled his ethical, legal, and fiduciary duty by sending a  
13 letter to the community describing what had transpired over the last several months between  
14 himself and Defendants.

15 35. Defendant Calvert responded days later and libeled Plaintiff with postings on the  
16 Targeted Justice website discussing the letter that Plaintiff authored. Defendants published  
17 communication of a false assertion of fact to the public on the internet. One such publication:

18 “A letter has been circulating in the T.I. community regarding my published  
19 ebooks. I am the sole author of my ebooks, and my name is clearly shown on the book  
20 cover. It is truly unfortunate when one individual, finds it necessary to misrepresent what  
21 I have published. I will continue to express my opinions, which are protected under the  
22 U.S. Constitution. Any real lawyer can confirm this - Opinions are protected speech. It  
23 is perfectly legal to publish my opinions on any subject. The Board of Directors at  
24 Targeted Justice has informed me, they fully support my efforts.”

25 36. Plaintiff did not misrepresent what Defendants published. Defendants felt the need to lie  
26 to the community in order to continue their harmful actions to the community.

27 37. Later in 2019, Defendant’s postings continued to damage Plaintiff. On July 10, 2019, in  
28 the case of *Christiana v. City of Laguna Beach, et al.* (Case No. 2018-00975317-CU-NP-CJC),  
Defendant County of Orange (Orange County) wrote a motion and was trying to discredit  
Plaintiff with organizations that he is associated with. Despite Plaintiff actively and currently

<sup>1</sup>This is the correct date of January 31, 2019. Plaintiff made a typo in original complaint stating that he called the FBI on January 25, 2019. Plaintiff has documented evidence of the correct date by way of his February 6, 2019 email to the FBI.

1 being involved as a leader on four civil rights organizations and on the board of directors,  
2 County of Orange did not even mention those organizations. Instead they tried to associate  
3 Plaintiff with “Targeted Justice” and even attached one of Defendant Calvert’s crazy looking  
4 graphs.

5 38. On August 15, 2019, Plaintiff filed an “Opposition” to the motion along with “Request  
6 for Judicial Notice” of supporting documentation noting that Plaintiff would not be with such an  
7 organization that is associated with federal crimes related to terrorism. Then in an unusual move,  
8 the August 28, 2019 hearing for the motion was continued. Then before the new hearing, again  
9 in a very unusual move, the County of Orange filed a “Withdrawal of Motion.” Luckily for  
10 Plaintiff, he was no longer associated with Targeted Justice and had the documentation to prove  
11 it. This proves in an actual court case, litigators and professions will use Targeted Justice to  
12 discredit anyone that is associated with Targeted Justice.

13 39. On December 20, 2019, a lieutenant with the Intelligence Branch of the Homeland  
14 Security Bureau, D.C. Metropolitan Police Department called Plaintiff asking for information  
15 and later emailed plaintiff thanking him for the information. Then later on February 13, 2020,  
16 Plaintiff was contacted and informed that the D.C. Metropolitan Police Department are doing an  
17 “active investigation” due to the conduct of Defendants Calvert, Clause, and Targeted Justice.

## 18 VI.

### 19 FIRST CAUSE OF ACTION

#### 20 (Breach of Board of Director Duty – Against all Defendants)

21 40. Plaintiff hereby realleges and incorporates by this reference, as though set forth in full  
22 herein, the allegations in paragraphs 1 through 39, inclusive.

23 41. Plaintiff is informed and believes, and thereupon alleges that, in doing the things alleged  
24 herein and in this cause of action, all above named Defendants (collectively, “Defendants”), and  
25 each of them breached and violated their duty of care as a director.

26 42. Defendant Winter Owen Calvert was on the Board of Directors.

27 43. Defendant Doris Clause was on the Board of Directors.

28 44. Plaintiff John Thomas Christiana was on the Board of Directors.

45. Defendants committed and engaged a willful violation of the duty imposed by law with  
direct participation in tortious and criminal acts of threatening or intimidating federal employees.

46. Defendants committed and engaged a willful violation of the duty imposed by law with



1 direct participation in tortious and criminal acts of crimes related to terrorism.

2 47. Defendants have violated the Targeted Justice Bylaws.

3 48. Defendants have mismanaged their duties causing damage to the character of the  
4 corporation, the board of directors including Plaintiff, the team, and its members.

5 49. The organization is currently under investigation by law enforcement, at last known  
6 correspondence.

7 50. Defendants have breached their fiduciary duty of loyalty, not acting in the best interests  
8 of the corporation and its collective members or shareholders.

9 51. There is an actual dispute between Plaintiff and Defendants and there is a duty owed. The  
10 issue is ripe and there is no other remedy available to Plaintiff.

11 52. As a direct and proximate result of said wrongful conduct by Defendants, and each of  
12 them, Plaintiff has suffered damages in an amount to be proven at trial.

13 53. Plaintiff is informed and believes, and thereupon alleges, that in performing the acts and  
14 performance herein alleged, Defendants, and each of them, acted in a conscious disregard of the  
15 rights of Plaintiff, the Board of Directors, the organization and its members. As a direct and  
16 proximate result of Defendants' collective and individual acts, Plaintiff is entitled to punitive  
17 damages against Defendants in an amount to be determined at trial.

## 18 VII.

### 19 SECOND CAUSE OF ACTION

#### 20 **(Breach of Board of Director Duty – Against Only Defendant Winter Owen Calvert)**

21 54. Plaintiff hereby realleges and incorporates by this reference, as though set forth in full  
22 herein, the allegations in paragraphs 1 through 53, inclusive.

23 55. Defendant Winter Owen Calvert is using Targeted Justice to promote his own website  
24 and self-dealing his own e-Books for profit. Defendant Calvert is interested in this self-dealing as  
25 he is making a personal profit from transaction dealing with a corporation.

26 56. There is an actual dispute between Plaintiff and Defendants and there is a duty owed. The  
27 issue is ripe and there is no other remedy available to Plaintiff.

28 57. As a direct and proximate result of said wrongful conduct by Defendants, and each of  
29 them, Plaintiff has suffered damages in an amount to be proven at trial.

58. Plaintiff is informed and believes, and thereupon alleges, that in performing the acts and

1 performance herein alleged, Defendants, and each of them, acted in a conscious disregard of the  
2 rights of Plaintiff, the Board of Directors, the organization and its members. As a direct and  
3 proximate result of Defendants' collective and individual acts, Plaintiff is entitled to punitive  
4 damages against Defendants in an amount to be determined at trial.

5 **VIII.**

6 **THIRD CAUSE OF ACTION**

7 **(Defamation – Against all Defendants)**

8 59. Plaintiff hereby realleges and incorporates by this reference, as though set forth in full,  
9 the allegations in paragraphs 1 through 58, inclusive.

10 60. Plaintiff is informed and believes, and thereupon alleges that, in doing the things alleged  
11 herein and in this cause of action, Defendants committed libel by publishing communication of a  
12 false assertion of fact to a third-party, the public at large on the internet, which has caused  
13 damage and harm to Plaintiff's reputation.

14 61. Defendants published statements were false.

15 62. Defendants published statements were defamatory and brought Plaintiff into disrepute,  
16 contempt, or ridicule, and impeached his honesty, integrity, virtue, and reputation.

17 63. Defendants published statements were published to a third-party.

18 64. Defendants published statements were intentionally made knowing the statements were  
19 false.

20 65. Plaintiff has suffered non-pecuniary damages as a result of the statement. Arizona  
21 defamation law considers a publication which impeaches honesty, integrity, or reputation of a  
22 person to be libelous per se.

23 66. Plaintiff, as a law student and victims to hire him, published that Defendants are violating  
24 the law. Defendants published that Plaintiff is wrong and implied Plaintiff does not understand  
25 the law, injuring Plaintiff in his trade.

26 67. Plaintiff is considered a private figure.

27 68. Defendants committed defamation by implication.

28 69. Defendants knew the offending material would be circulated as Defendants published  
them.

70. There is an actual dispute between Plaintiff and Defendants and there is a duty owed to



1 Plaintiff. The issue is ripe as it is current and ongoing. There is no other remedy available to  
2 Plaintiff aside from an injunction or award from this Court.

3 71. As a direct and proximate result of said wrongful conduct by Defendants, and each of  
4 them named in this cause, Plaintiff has suffered damages in an amount to be proven at trial.

5 72. Plaintiff is informed and believes, and thereupon alleges, that in performing the acts and  
6 performance herein alleged, Defendants, and each of them, acted in a conscious disregard of the  
7 rights of Plaintiff. As a direct and proximate result of Defendants' collective and individual acts,  
8 Plaintiff is entitled to punitive damages against Defendants in an amount to be determined at  
9 trial.

### 10 IX.

#### 11 FOURTH CAUSE OF ACTION

##### 12 (Wrongful Termination Against all Defendants)

13 73. Plaintiff hereby realleges and incorporates by this reference, as though set forth in full,  
14 the allegations in paragraphs 1 through 72, inclusive.

15 74. Defendants Winter Owen Calvert, Doris Clause, and Targeted Justice wrongfully and  
16 illegally terminated Plaintiff off the board of directors of Targeted Justice for reporting  
17 Defendants to the FBI for criminal behavior by Defendants. This behavior by Defendants put the  
18 non-profit in a compromising situation and discredited the organization, the board of directors,  
19 the team, and its members.

20 75. On February 6, 2019, Defendants sent Plaintiff an email that he needs to resign and be  
21 removed off the Targeted Justice Board of Directors.

22 76. The reason for the termination was because Plaintiff reported Defendant Winter Owen  
23 Calvert, alias Richard Lighthouse, to the FBI for soliciting crimes related to terrorism. That is a  
24 violation of federal law, namely 18 U.S. Code § 1513, which states:

25 "Whoever knowingly, with the intent to retaliate, takes any action harmful to any  
26 person, including interference with the lawful employment or livelihood of any person,  
27 for providing to a law enforcement officer any truthful information relating to the  
28 commission or possible commission of any Federal offense shall be fined under this title  
or imprisoned not more than 10 years, or both."

77. The termination was also a violation of Arizona state law and an exception to the at-will  
employment doctrine. The State of Arizona's Whistleblower Protection Act states that an  
employee may not be discharged in retaliation for disclosing that he has information (or a

1 reasonable belief) that the employer has violated, is violating, or will violate an Arizona statute  
2 or constitutional provision. Threatening or intimidating is usually charged as class 1  
3 misdemeanor. The Arizona Revised Statutes have been updated to include the revised sections  
4 including false reporting of terrorism.

5 78. Under the Employment Protection Act (EPA), including non-profit corporations,  
6 Plaintiffs have three avenues of relief for claims on the theory of wrongful discharge," one of  
7 which is when "the discharge violated a statute of this state."

8 79. There is an actual dispute between Plaintiff and Defendants and there is a duty owed to  
9 Plaintiff. The issue is ripe as it is current and ongoing. There is no other remedy available to  
10 Plaintiff aside from an injunction or award from this Court.

11 80. As a direct and proximate result of said wrongful conduct by Defendants, and each of  
12 them named in this cause, Plaintiff has suffered damages in an amount to be proven at trial.

13 81. Plaintiff is informed and believes, and thereupon alleges, that in performing the acts and  
14 performance herein alleged, Defendants, and each of them, acted in a conscious disregard of the  
15 rights of Plaintiff. As a direct and proximate result of Defendants' collective and individual acts,  
16 Plaintiff is entitled to punitive damages against Defendants in an amount to be determined at  
17 trial.

## 18 X.

### 19 FIFTH CAUSE OF ACTION

#### 20 (Intentional Infliction of Emotional Distress)

21 82. Plaintiff hereby realleges and incorporates by this reference, as though set forth in full,  
22 the allegations in paragraphs 1 through 81, inclusive.

23 83. Plaintiff is informed and believes, and thereupon alleges that, in doing the things alleged  
24 herein and in this cause of action, all above named Defendants (collectively, "Defendants"), and  
25 each of them caused severe emotional distress.

26 84. The Defendant's conduct was extreme and outrageous. Defendants invited Plaintiff to  
27 join a civil rights organization, Targeted Justice, fighting for constitution, civil and human rights.  
28 Then Defendants associated the organization, Targeted Justice, either directly or indirectly with  
federal crimes threatening or intimidating federal employees, and Defendants also associated this  
civil rights organization with federal crimes related to terrorism. Plaintiff was the Legal Director  
and on the Board of Directors. Plaintiff is fighting for his own civil rights and does not need to



1 be associated with Defendants crimes and terrorism. If this is not extreme and outrageous,  
2 nothing is. This is certainly beyond all possible bounds of decency to basically set up Plaintiff  
3 and the rest of the board of directors, team, and members. This conduct is atrocious and utterly  
4 intolerable in a civilized community.

5 85. The Defendants either intended to cause emotional distress or acted with reckless  
6 disregard that such distress would result. Defendants had opportunity to remove the threats and  
7 terrorism related activity as Plaintiff made phone calls and sent emails addressing this.  
8 Defendants refused to comply. This was intentional and reckless.

9 86. Plaintiff suffered severe emotional distress as a result. Plaintiff has had to deal with this  
10 association – and Defendants continue - and it is hurting Plaintiff as Plaintiff is trying to show  
11 that the civil rights organizations that Plaintiff is associated with are lawful and the leaders and  
12 members are the actual victims fighting for human rights, civil rights, freedom, the rule of law,  
13 humanity, and the future of the United States of America. Defendants are hurting this fight and  
14 are continuing to hurt this fight.

15 87. There is an actual dispute between Plaintiff and Defendants and there is a duty owed. The  
16 issue is ripe and there is no other remedy available to Plaintiff.

17 88. As a direct and proximate result of said wrongful conduct by Defendants, and each of  
18 them, Plaintiff has suffered damages in an amount to be proven at trial.

19 89. Plaintiff is informed and believes, and thereupon alleges, that in performing the acts and  
20 performance herein alleged, Defendants, and each of them, acted in a conscious disregard of the  
21 rights of Plaintiff, the Board of Directors, the organization and its members. As a direct and  
22 proximate result of Defendants' collective and individual acts, Plaintiff is entitled to punitive  
23 damages against Defendants in an amount to be determined at trial.

## 24 XI.

### 25 SIXTH CAUSE OF ACTION

#### 26 (Negligence)

27 90. Plaintiff hereby realleges and incorporates by this reference, as though set forth in full,  
28 the allegations in paragraphs 1 through 89, inclusive.

91. Plaintiff is informed and believes, and thereupon alleges that, in doing the things alleged  
herein and in this cause of action, all above named Defendants (collectively, "Defendants"), and  
each of them are liable for Negligence.

1 92. The Defendant's conduct was negligent. Defendants had a duty to conform to a certain  
2 standard of care, as directors of a non-profit civil rights organization.

3 93. Defendants breached that standard, for reasons stated in above section.

4 94. There was a causal connection between Defendant's conduct and the resulting injury, for  
5 reasons stated in above section.

6 95. There were actual damages, for reasons stated in above section.

7 96. There is an actual dispute between Plaintiff and Defendants and there is a duty owed. The  
8 issue is ripe and there is no other remedy available to Plaintiff.

9 97. As a direct and proximate result of said wrongful conduct by Defendants, and each of  
10 them, Plaintiff has suffered damages in an amount to be proven at trial.

11 98. Plaintiff is informed and believes, and thereupon alleges, that in performing the acts and  
12 performance herein alleged, Defendants, and each of them, acted in a conscious disregard of the  
13 rights of Plaintiff, the Board of Directors, the organization and its members. As a direct and  
14 proximate result of Defendants' collective and individual acts, Plaintiff is entitled to punitive  
15 damages against Defendants in an amount to be determined at trial.

## 16 XII.

### 17 CLAIM FOR INJUNCTIVE RELIEF

#### 18 (Stop Defendants' Threats and Crimes Related to Terrorism)

19 99. Plaintiff hereby realleges and incorporates by this reference, as though set forth in full,  
20 the allegations in paragraphs 1 through 98, inclusive.

21 100. Plaintiff asks this Court for an injunction to stop harassment of Plaintiff, the  
22 members of Targeted Justice, and public by publishing threats, or intimidating federal  
23 employees, and state employees associated with federal employees, accusing them of crimes  
24 without proof (not that that matters) while posting their families names and home addresses, and  
25 soliciting and encouraging crimes related to terrorism, thereby associating Plaintiff and members  
26 of Targeted Justice to the threats and crimes related to terrorism by Defendants Winter Owen  
27 Calvert (alias Richard Lighthouse) and Doris Clause (alias Midge Mathis).

28 101. Publishing these crimes and crimes related to terrorism on the Targeted Justice website



1 and other websites and emails is a public nuisance. Civil process of injunction, generally, may  
2 not be used to prevent persons from committing crime, but where crime is public nuisance, or  
3 affects interests of state, or those entitled to protection against its commission, injunction will lie.

4 102. There is no other remedy available to Plaintiff aside from an injunction from this Court to  
5 order Defendants to stop harassment and to follow the laws of the State of Arizona and the  
6 United States of America.

### 7 XIII.

#### 8 CLAIM FOR DECLARATORY RELIEF

#### 9 (Stop Defendants' Threats and Crimes Related to Terrorism)

10 103. Plaintiff hereby realleges and incorporates by this reference, as though set forth in full,  
11 the allegations in paragraphs 1 through 102, inclusive.

12 104. Plaintiff asks this Court for declaratory relief from Defendants putting Plaintiff, the  
13 members of Targeted Justice, and public's reputations, freedoms, and livelihoods in danger by  
14 publishing threats to federal employees and state employees associated with federal employees  
15 while posting their families names and home addresses, and soliciting and encouraging crimes  
16 related to terrorism, thereby associating Plaintiff and members of Targeted Justice to the threats  
17 and crimes related to terrorism by Defendants Winter Owen Calvert (alias Richard Lighthouse)  
18 and Doris Clause (alias Midge Mathis).

19 105. A justiciable controversy exists. Plaintiff has asserted a right, status, or legal relation  
20 against Defendants in which Plaintiff has a definite interest and a denial of it by the opposing  
21 party. Defendants claim posting addresses of federal employees (and their families) and local law  
22 enforcement employees working with federal employees – while accusing them of atrocious  
23 crimes - to the very audience that Defendants are targeting.

24 106. There is no other remedy available to Plaintiff aside from declaratory relief from this  
25 Court to order Defendants to stop harassment and to follow the laws of the State of Arizona and  
26 the United States of America.

27 WHEREFORE, Plaintiff prays for judgment as follows:

#### 28 ON THE FIRST CAUSE OF ACTION

1. For compensatory, general, special, and consequential damages against Defendants, and

1 each of them, in an amount to be proven at trial, plus pre and post judgment interest at the  
2 maximum rate allowed by law;

3 2. For exemplary and punitive damages against Defendants, and each of them, in an amount  
4 to be determined at trial;

5 **ON THE SECOND CAUSE OF ACTION**

6 3. For compensatory, general, special, and consequential damages against Defendants, and  
7 each of them, in an amount to be proven at trial, plus pre and post judgment interest at the  
8 maximum rate allowed by law;

9 4. For exemplary and punitive damages against Defendants, and each of them, in an amount  
10 to be determined at trial;

11 **ON THE THIRD CAUSE OF ACTION**

12 5. For compensatory, general, special, and consequential damages against Defendants, and  
13 each of them, in an amount to be proven at trial, plus pre and post judgment interest at the  
14 maximum rate allowed by law;

15 6. For exemplary and punitive damages against Defendants, and each of them, in an amount  
16 to be determined at trial;

17 **ON THE FOURTH CAUSE OF ACTION**

18 7. For compensatory, general, special, and consequential damages against Defendants, and  
19 each of them, in an amount to be proven at trial, plus pre and post judgment interest at the  
20 maximum rate allowed by law;

21 8. For exemplary and punitive damages against Defendants, and each of them, in an amount  
22 to be determined at trial;

23 **ON THE FIFTH CAUSE OF ACTION**

24 9. For compensatory, general, special, and consequential damages against Defendants, and  
25 each of them, in an amount to be proven at trial, plus pre and post judgment interest at the  
26 maximum rate allowed by law;

27 10. For exemplary and punitive damages against Defendants, and each of them, in an amount  
28 to be determined at trial;

**ON THE SIXTH CAUSE OF ACTION**

11. For compensatory, general, special, and consequential damages against Defendants, and



1 each of them, in an amount to be proven at trial, plus pre and post judgment interest at the  
2 maximum rate allowed by law;

3 12. For exemplary and punitive damages against Defendants, and each of them, in an amount  
4 to be determined at trial;

5 **ON THE CLAIM FOR INJUNCTIVE RELIEF**

6 13. To be granted and enforced.

7 **ON THE CLAIM FOR DECLARATORY RELIEF**

8 14. To be granted.

9 **ON ALL CAUSES OF ACTION:**

10 15. For reasonable costs incurred to the extent available by law;

11 16. For such other and further relief as the Court may deem just and proper.

12 **DEMAND FOR JURY TRIAL**

13 Plaintiff hereby demands trial by jury on all issues triable by jury.

14  
15 DATED: May 15, 2020

16   
17 John Thomas Christiana  
18 Plaintiff in Propria Persona  
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PROOF OF SERVICE

I, [REDACTED], declare that I am 18 years old or older, a resident of San Bernardino County, California, and am not a party to this action. My address is [REDACTED] [REDACTED], California 92327.

On May 15, 2020, I served the attached documents described as: FIRST AMENDED COMPLAINT by placing a true copy in the mail enclosed in a sealed envelope with postage fully prepaid, addressed as follows:

Waldron Evans PLC  
Robert C. Brown  
9590 E. Ironwood Square Drive, Suite 105  
Scottsdale, AZ 85258

Doris Clause  
[REDACTED]


I declare under penalty of perjury under the laws of the State of Arizona and the State of California that the foregoing is true and correct and this declaration was executed at Daggett, California.

Dated: May 15, 2020

[REDACTED]

I, John Christiana, declare under penalty of perjury, declare that a copy was placed in the mail enclosed in a sealed envelope with postage fully prepaid, addressed as above.

Dated: May 15, 2020

  
John Christiana