

**CAUSE NO. 115738-CV**

JOHN THOMAS CHRISTIANA,

*Plaintiff*

v.

WINTER OWEN CALVERT, and  
TARGETED JUSTICE,

*Defendants*

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**IN THE DISTRICT COURT OF**

**BRAZORIA COUNTY, TEXAS**

\_\_\_\_\_ **JUDICIAL DISTRICT**

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**PLAINTIFF'S ORIGINAL PETITION**

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TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff John Thomas Christiana files this Original Petition, complaining of Winter Owen Calvert and Targeted Justice, and in support thereof would respectfully show the Court as follows:

**I.**

**SUMMARY OF THE CASE**

1. Defendant Winter Owen Calvert ("Calvert") using his both his real name, and also under an alias name Richard Lighthouse, has aggressively and repeatedly with malice, and also without diligence or care, published defamatory statements regarding Plaintiff John Thomas Christiana ("Plaintiff") including both libel through emails and websites, and slander through phone calls. Calvert has done this in his own name and alias, as well as through Targeted Justice, a business with Winter Owen Calvert as the Registered Agent. Christiana has warned Defendants that their statements are false and yet Defendants continue their defamation in oral statements, emails, and on websites on the internet. Defendants have stated as fact that Plaintiff is a convicted felon of a serious crime, that Plaintiff is not, and Defendants have made up statements as fact about Plaintiff's competence, that are completely untrue.

2. The purpose for Defendants defamation is to discredit Christiana because Christiana has

reported Defendants to law enforcement and the Federal Bureau of Investigation (“FBI”) for Defendants’ illegal threats to law enforcement officials and illegal threats to law enforcement families. Defendants further defame Plaintiff by stating it is legal to threaten and intimidate law enforcement – and imply that Christiana does not know how to read criminal code. Defendants want to make the public believe that it is legal to post home addresses of law enforcement while threatening or intimidating them. It is not legal. Defendants publish State of Texas police officers and law enforcement names, both local and federal, and their families’ names, and their home addresses, while stating they are liable for crimes to victims and sends this information to the victims. The purpose is to intimidate or threaten them. United States Code § 119, “Protection of individuals performing certain official provides that “Restricted personal information” including the “home address” may not be published to intimidate or threaten these protected officials. Defendants are libeling and slandering Christiana so Defendants can continue their threats to law enforcement and their families.

3. Another purpose for Defendants defamation is to discredit Christiana because Christiana has reported Defendants are also soliciting people to commit federal crimes related to terrorism. Defendants are soliciting people to submit false information to the FBI, namely to try to sabotage the FBI’s official terrorist watchlists. Defendants claim this is legal too. It is reported all Defendants support Winter Owen Calvert in his terrorist activities and are telling the public and common community that Defendants illegal threats to law enforcement, and terrorism related crimes are legal. If this Court thinks that Plaintiff might be exaggerating about defendants’ threats to law enforcement and crimes related to terrorism stated here, Plaintiff is not.

## II.

### THE PARTIES

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

5. Upon information and belief, Defendant Winter Owen Calvert is, and at relevant times, a resident of the County of Brazoria, State of Texas. Upon information and belief, Winter Owen Calvert is the sole person maintaining and posting on the Targeted Justice website, a Texas business registered in the City of Pearland, County of Brazoria, State of Texas.

6. Upon information and belief, Defendant Targeted Justice is, and at all relevant times, is a Texas business registered in the City of Pearland, County of Brazoria, State of Texas.

**III.**

**JURISDICTION AND VENUE**

7. The damages sought in this case exceed the jurisdictional limits of Brazoria County Courts.

8. Venue is proper in Brazoria County, Texas, because a suit for damages for libel, slander, or invasion of privacy shall be brought and can only be maintained in the county in which the plaintiff resided at the time of the accrual of the cause of action, or in the county in which the defendant resided at the time of filing suit, or in the county of the residence of defendants, or any of them, or the domicile of any corporate defendant, at the election of the plaintiff. Texas Civil Practice and Remedies Code - CIV PRAC & REM § 15.017. Libel, Slander, or Invasion of Privacy.

9. Venue is proper in Brazoria County, Texas because one or more of Defendants reside in Brazoria County, Texas. Venue is also proper because in a suit in which a plaintiff properly joins two or more claims or causes of action arising from the same transaction, occurrence, or series of transactions or occurrences, and one of the claims or causes of action is governed by the mandatory venue provisions of Subchapter B, 1 the suit shall be brought in the county required by the mandatory venue provision. Texas Civil Practice and Remedies Code - CIV PRAC & REM § 15.004. Mandatory Venue Provisions Governs Multiple Claims.

10. Pursuant to Rule 47 of the Texas Rules of Civil Procedure, Plaintiff is seeking monetary relief of \$250,000 or less and non-monetary relief.

**IV.**

**JURY DEMAND**

11. Plaintiff demands a trial by jury.

**V.**

**DISCOVERY LEVEL**

12. Plaintiff intends that discovery be conducted under Discovery Level 2.

**VI.**

**GENERAL ALLEGATIONS**

**Background - Reason for Defendants' Defamation**

13. In the fall of 2017, Plaintiff was invited by Doris Clause, using alias Midge Mathis,



(“Clause”) to join a non-profit civil rights organization. The inaugural meeting of about ten people, including Plaintiff and Defendants, was in Winnsboro, Texas. from about December 15, 2017 to December 18, 2017, where the mission and goals were discussed. The organization name was voted on and decided to be called “Targeted Justice.” Because Plaintiff had legal and law school experience, Plaintiff was asked to be the Targeted Justice Legal Director. Soon after, Plaintiff was put on the Board of Directors.

14. Throughout 2018, there were three in-person board meetings that Plaintiff attended, including Colorado Springs, Colorado area on March 30, 2018; Albuquerque, New Mexico on June 1, 2018; and Rockaway Beach, Oregon on December 1, 2018. Targeted Justice was active all year with close to a dozen board and team members, as well a membership list in the thousands, growing every day.

15. On January 25, 2019, as Legal Director, Plaintiff was informed that Winter Owen Calvert, using his alias Richard Lighthouse, that he is known by Targeted Justice, was involved in threats and intimidation to police officers and law enforcement. In addition, he was soliciting people to sabotage the official FBI terrorist watchlists. Mr. Calvert was doing this using the name Targeted Justice. Targeted Justice was a registered non-profit organization with legal consequences. Plaintiff called for an emergency board meeting. Plaintiff requested Defendant Calvert take down the threats and terrorism crimes. Mr. Calvert refused. Plaintiff said he will contact the FBI to protect the organization if he does not take it down. Mr. Calvert refused.

16. Plaintiff had a legal, fiduciary, and ethical duty to protect the members of Targeted Justice, not to be associated with terrorism. Not only was this hurting the United States of America, but also Targeted Justice members and innocent victims associated with Targeted Justice that would unknowingly be put on the terrorist watch list.

17. Therefore on January 31, 2019, Plaintiff contacted the FBI Houston office reporting this criminal behavior and crimes related to terrorism. Doris Clause was upset with Plaintiff because she thought it should have been a board decision. Doris Clause put Owen Calvert on the Board of Directors.

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

19. Plaintiff Christiana sued in an Arizona court, the Justice Court, for illegal termination and an injunction to force Calvert to stop these threats to law enforcement. The illegal termination tort was dismissed due to board members were not paid. The injunction claim was withdrawn by Plaintiff as the court informed Plaintiff that injunctions must be filed in the Superior Court.
20. Winter Owen Calvert moved the Targeted Justice headquarters to the State of Texas.
21. Plaintiff is now filing the Injunction and Declaratory relief in the Superior Court.
22. Defendants, mainly Winter Owen Calvert, but also using the name Targeted Justice, now in Texas, went on a rampage to defame Plaintiff, sending out emails, posting on websites, and making phone calls.
23. Plaintiff is now suing for this defamation.

**The Crimes and Threats to Police Officers, Law Enforcement and Their Families  
by Winter Owen Calvert and Targeted Justice**

**Naming them all by name and providing their Home Addresses.**

24. Defendants to this day and including the day of this filing are making threats to Texas police officers and law enforcement. Defendants started this in December of 2018 and again in 2019 accused law enforcement officials of crimes, based on their title. Then he sent emails and posted this on the Targeted Justice website and sent these emails to actual victims of which Defendants accused these law enforcement officials of the crimes being done to them. While accusing these officials, he would name the law enforcement names as well as their children, mom, dad, and family members while publishing their home address. Defendants would tell his audience that these government employees are responsible for crimes to them. Defendants further tells his followers that his conduct is legal, but it is not.

25. This is commonly known as doxing and is illegal by state law. The United States Code that is being violated is 18 U.S. Code § 119, "Protection of individuals performing certain official duties" which carries up to 5 years in prison for each court. Plaintiff estimates there are about 50 local, state, and federal law enforcement officials that he is doxing plus the family members that he names that live at the same address. The code states:

(a) In General.—Whoever knowingly makes restricted personal information about a covered person, or a member of the immediate family of that covered person, publicly available—



- (1) with the intent to threaten, intimidate, or incite the commission of a crime of violence against that covered person, or a member of the immediate family of that covered person;  
or  
(2) with the intent and knowledge that the restricted personal information will be used to threaten, intimidate, or facilitate the commission of a crime of violence against that covered person, or a member of the immediate family of that covered person,  
shall be fined under this title, imprisoned not more than 5 years, or both.

26. Defendants began these crimes in December of 2018 but to this day these threats are still on his websites. In fact, because undeterred, Defendant Calvert has published a second and third website committing these federal crimes against law enforcement and their families.

#### **Defendants Solicitation of False Information**

##### **To Submit and Sabotage the Official Govt. FBI Terrorist Watchlists**

27. Defendant Winter Owen Calvert using alias Richard Lighthouse solicits, on his website Rlighthouse, people both domestically and internationally to engage in federal crimes related to terrorism. Calvert solicits people to submit false information to the government - falsely representing themselves - to paralyze the official FBI terrorism watchlist that was started after the 9-11 terrorist attacks. There are two that Defendant Calvert is attacking. One is called the Terrorist Screening Center ("TSC") on the FBI website and the other is called the National Counterterrorism Center ("NCTC"). The NCTC is a United States government organization responsible for national and international counterterrorism efforts. The words that Defendant Calvert used were to make the TSC "useless and a joke." This is on public websites. This would violate state law and at a minimum United States Code § 1001.

28. There is no purpose except to hurt the fight against terrorism and also get innocent people to commit federal crimes related to terrorism, which of course could put them themselves on the terrorist watchlists. Calvert reports that the FBI terrorist watchlists are actually "intake" systems *for them*. Defendant Calvert has published on his website:

*In my opinion, the Targeted Individual Program can be shut down by paralyzing the intake system (new TI's) with a flood of bad information. The NCTC and the TSC hold the databases where the new entrants are catalogued.*

*Currently, the intake system for new TI's is done manually. Using the Standard Nomination Form, new entrants must be input manually into the system. ... To enter the system manually, someone must transfer the new information to a computer and manually enter it.*

*What is needed, are some friendly computer hackers on the Dark Web that can set up a computer bot network to send millions of new form entrants to the intake system. Given that China, Russia, Venezuela, Syria, North Korea, and many other governments hate the Deep State - this should be relatively easy.*

29. It would be very difficult to argue that this is not a federal crimes related to terrorism. This is dangerous not only to the United States but also to the people that listen to and follow Defendants Winter Owen Calvert, alias Richard Lighthouse, and Targeted Justice and its followers.

### **Defendants Defamation – both Libel and Slander**

#### **Because Plaintiff Reported Defendants Crimes and Terrorism to the FBI**

30. Defendants have committed defamation against Plaintiff because Plaintiff is protecting both victims of crimes as well as the United States. Because Plaintiff has been outspoken and warning people about Defendants threats to law enforcement, Defendants have been active to discredit Christiana for the purpose so Defendant's audience will believe Defendants actions are legal. They are not legal.

31. Defendants' have made statements that these crimes are legal and Defendants state that Christiana is misinforming the public and community - is defamation in itself.

32. Defendants have gone out of their way to publish lies to hurt Plaintiff's reputation, which is libel per se. Defendants do this to discredit Plaintiff and in effect this allows them to continue their terrorism crimes and threats to law enforcement. Defendants defamation includes emails, websites, phone calls and on talk shows.

#### **Defamation - E-mails**

33. Defendants have sent repeated emails to a massive group of people for the purpose to defame Christiana because Christiana is exposing Defendants' crimes and threats to police officers. Here is one such publication to a third party. Defendants wrote:

*Court records in California state that:*

- 1) John Thomas Christiana is a convicted arsonist, and was required to register with the local government where he lives.*
- 2) Christiana was declared mentally incompetent by 2 different courts in California, in approx. 2010 and 2019.*
- 3) Christiana's name appears on the official California Vexatious Litigant list. A Judge ruled that he filed at least 6 court cases, that were without merit."*



34. Here we have three defamatory statements, as clear as it gets. This is exactly why we have defamation codes. Court records or any records do not state this.

- 1) John Thomas Christiana is not a convicted arsonist. John Thomas Christiana is not required to or registered with the local government where he lives.
- 2) Christiana was not declared mentally incompetent by 2 different courts in California, in approx. 2010 and 2019.
- 3) A Judge did not rule that (Christiana) filed at least 6 court cases that were without merit.

35. Defendants have sent out numerous emails to hundreds of people both direct and blind copy.

#### **Defamation - Websites**

36. For the same reasons stated above for e-mails, Defendants have also libeled Plaintiff on the internet through their website, Targeted Justice. Four statements all untrue:

- 1) *According to California law, he filed at least 5 frivolous or meritless court cases.*
- 2) *Further, Christiana was declared mentally incompetent in two different court cases - one in 2010, and another in 2019.*
- 3) *In 2017, Christiana sued his sister - that case was also dismissed by a Judge in California, because it had no merit.*
- 4) *Due to his prior conviction on arson charges, the State of California requires that Christiana register locally as a convicted arsonist.*

37. These comments are all untrue and some made up in Defendants' heads. Defendants also have posted on their website a quote from an article where Defendants intentionally mislead: *"...The last two years involved reports of Christiana vandalizing cars in the Big Pine Creek area."*

38. Defendants intentionally omit the date of an article and make it appear that these accusations were the last two years.

39. Further defamation is the denial that Defendants terrorism related crimes and threats to law enforcement are legal. Defendants imply that Plaintiff is unintelligent and their crimes are not crimes, which is defamation in itself. This is even damaging to the public at large as the reader will believe Defendants actions are legal. They are not legal.

#### **Defamation - Oral Statements and Phone calls**

40. Defendants have made phone calls and lied to Plaintiff's friends. Defendants said

- 1) There are several lawsuits against Plaintiff. There are none.
- 2) Defendants said that Plaintiff is wanted for arson. Plaintiff was and is not.



## Defamation - E-mails – Websites – Oral Statements

41. Defendants have used all forms of communication to slander and libel Plaintiff. And to make matters worse, this is to discredit Plaintiff so to convince the unknowing public that it is legal to fraud the United States government to sabotage the official FBI terrorist watchlists and post home addresses of law enforcement which accusing them of crimes and sending this information to the very victims that Defendants are targeting.

### VII.

#### FIRST CAUSE OF ACTION

##### (Defamation – Defamation Per Se)

42. Plaintiff hereby realleges and incorporates by this reference the foregoing allegations as if fully set forth herein.

43. Plaintiff is informed and believes, and thereupon alleges that, in doing the things alleged
- herein in this cause of action and as alleged in the General Allegations above, Defendants committed libel by publishing communication of a false assertion of fact to a third-party, via emails;
  - committed libel by publishing communication of a false assertion of fact to a third-party, via the internet and websites to the general public;
  - committed slander to Plaintiff by publishing communication of a false assertion of fact to a third-party, via phone calls and talk shows,

which has caused damage and harm to Plaintiff, including his reputation.

44. Here is one such publication on an email to a third party. Defendants wrote:

*Court records in California state that:*

- 1) *John Thomas Christiana is a convicted arsonist, and was required to register with the local government where he lives.*
- 2) *Christiana was declared mentally incompetent by 2 different courts in California, in approx. 2010 and 2019.*
- 3) *Christiana's name appears on the official California Vexatious Litigant list. A Judge ruled that he filed at least 6 court cases, that were without merit."*

45. Here is one such publication on a website to a third party. Defendants wrote:

- 1) *According to California law, he filed at least 5 frivolous or meritless court cases.*
- 2) *Further, Christiana was declared mentally incompetent in two different court cases - one in 2010, and another in 2019.*
- 3) *In 2017, Christiana sued his sister - that case was also dismissed by a Judge in California, because it had no merit.*
- 4) *Due to his prior conviction on arson charges, the State of California requires that Christiana register locally as a convicted arsonist.*

46. Here is one such publication on a phone call to a third party. Defendants said:

- 1) There are several lawsuits against Plaintiff. (There are none).
- 2) Defendants said that Plaintiff is wanted for arson. (Plaintiff was and is not).

47. Defendants published false statements both in writing and oral. The foregoing statements made and published by Defendants were statements of fact that were false, both in their particular details and in the main point, essence, or gist in the context in which they were made.

48. The foregoing statements made and published by Defendants were libelous per se because they injured Plaintiff's reputation and thereby exposed Plaintiff to public hatred, contempt or ridicule, and financial injury.

49. The foregoing statements made and published by Defendants were libelous per se because they impeached Plaintiff's honesty, integrity, virtue, reputation, and good name.

50. The foregoing statements made and published by Defendants were libelous per se because they injured Mr. Christiana in his office, profession, and/or occupation.

51. The foregoing statements made and published by Defendants were libelous per se because to the extent they falsely charged Mr. Christiana to be a convicted arsonist.

52. Defendants published statements were published to a third-party.

53. Defendants published statements were intentionally made knowing the statements were false. Plaintiff had informed Defendants that the statements were false.

54. The foregoing statements made and published by Defendants directly and/or indirectly referred to Plaintiff John Thomas Christiana.

55. Plaintiff is considered a private individual and is neither a public official nor a public figure for any purpose.

56. Defendants are all non-media defendants.

57. Defendants committed defamation by implication.

58. Plaintiff has suffered non-pecuniary damages as a result of the statements.

59. Defendants are strictly liable for the damages caused by the libel and slander.

60. Defendants knew the foregoing defamatory statements were false or were reckless with regard to whether the statements of fact were false.

61. Defendants knew the offending material would be circulated as Defendants published.

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



Plaintiff. The issue is ripe as it is current and ongoing. There is no other remedy available.

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

64. Plaintiff is informed and believes, and thereupon alleges, that in performing the acts and performance herein alleged, Defendants, and each of them, acted in a conscious disregard of the truth and Mr. Christiana is entitled to recover nominal damages, general damages, special damages, and or exemplary damages.

## VIII.

### SECOND CAUSE OF ACTION

#### (Intentional Infliction of Emotional Distress)

65. Plaintiff hereby realleges and incorporates by this reference the foregoing allegations as if fully set forth herein.

66. 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 caused severe emotional distress.

67. The Defendant's conduct was extreme and outrageous. Defendants invited Plaintiff to join a civil rights organization, Targeted Justice, fighting for constitution, civil and human rights. 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 be associated with Defendants crimes and terrorism. Plaintiff protected himself and the organization that he is the Legal Director of. Then Defendants libel and slander Plaintiff. This is extreme and outrageous behavior to Plaintiff. This is certainly beyond all possible bounds of decency to basically set up Plaintiff. This conduct is atrocious and utterly intolerable in a civilized community. This conduct is dangerous. Plaintiff became a Legal Director after he left Targeted Justice and Defendants committed these actions to hurt Plaintiff's reputation in which hurts Plaintiff's life because he is fighting for human rights and needs credibility.

68. The Defendants either intended to cause emotional distress or acted with reckless disregard that such distress would result. Defendants had opportunity to remove the threats and terrorism related activity as Plaintiff made phone calls and sent emails addressing this.

Defendants refused to comply. This was intentional and reckless.

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

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

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

72. Plaintiff is informed and believes, and thereupon alleges, that in performing the acts and performance herein alleged, Defendants, and each of them, acted in a conscious disregard of the truth and Mr. Christiana is entitled to recover nominal damages, general damages, special damages, and or exemplary damages.

## IX.

### CLAIM FOR INJUNCTIVE RELIEF

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

73. Plaintiff hereby realleges and incorporates by this reference the foregoing allegations as if fully set forth herein.

74. This Injunctive Relief claim meets the requirements set forth what is needed for an Order under Texas Rule of Civil Procedure 683. Defendants conduct and actions are dangerous and a public nuisance. This Court should order Defendants to stop publishing home address of protected officials. This Court should order Defendants to stop their crimes related to terrorism. Defendants to this day, the day of this filing, December 2, 2021, continue these threats and terrorist activities. Defendants have not been deterred in their terrorist activities and threats to law enforcement. Defendants, at the present time, are involved in federal crimes publishing the home addresses of law enforcement officials while accusing them of crimes. This is obviously to intimidate and threaten them, and could not be a more obvious violation of both Arizona state law and United States Code §119, each occurrence punishable by five years in federal prison. In



addition, it is another five years in prison for each child, mother, father, or other relative living at that address, that Defendants name. Defendant Calvert is still involved directly in terrorist crimes

75. Because undeterred, Defendants have published a second and third website committing these federal crimes against law enforcement and their families.

76. Plaintiff asks this Court for an injunction to stop harassment of Plaintiff, the community at large, and the public, by publishing threats, or intimidating federal employees, and state employees associated with federal employees, accusing them of crimes without proof (not that that matters) while posting their families names and home addresses, and soliciting and encouraging crimes related to terrorism, thereby associating Plaintiff and members of Targeted Justice to the threats and crimes related to terrorism by Defendants Winter Owen Calvert (alias Richard Lighthouse) and Targeted Justice.

77. Not only is this a public nuisance to the police officers and law enforcement that Defendants target, but this is a public nuisance to the community and public because Defendants are reporting as fact that it is legal to do these threats while posting their home addresses of protected people and crimes related to terrorism.

78. Defendants are not only sending out emails to targeted people with this false information, but Defendants publish it on their websites which is a public nuisance.

79. Civil process of injunction, generally, may not be used to prevent persons from committing crime, but where crime is public nuisance, or affects interests of state, or those entitled to protection against its commission, injunction will lie.

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

## X.

### **CLAIM FOR DECLARATORY RELIEF**

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

81. Plaintiff hereby realleges and incorporates by this reference the foregoing allegations as if fully set forth herein.

82. Plaintiff asks this Court for declaratory relief from Defendants putting Plaintiff, the community, and public at risk. Further, Defendants are threatening the Plaintiff and community's reputations, freedoms, and livelihoods in danger by publishing these threats and terrorist crimes,

associating Plaintiff and the community to the threats and crimes related to terrorism by Defendants Winter Owen Calvert (alias Richard Lighthouse) and Targeted Justice.

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

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

## XI.

### DAMAGES

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

WHEREFORE, Plaintiff prays for judgment as follows:

#### ON THE FIRST CAUSE OF ACTION

1. For recovery of nominal damages, general damages, special damages, exemplary damages, compensatory, consequential damages and /or punitive damages as allowed by law or determined at trial, against Defendants.

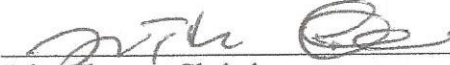
#### ON THE SECOND CAUSE OF ACTION

1. For recovery of nominal damages, general damages, special damages, exemplary damages, compensatory, consequential damages and /or punitive damages as allowed by law or determined at trial, against Defendants.

#### ON ALL CAUSES OF ACTION:

2. For reasonable costs incurred to the extent available by law;
3. For such other and further relief as the Court may deem just and proper.

DATED: December 2, 2021

  
John Thomas Christiana  
Plaintiff in Propria Persona