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IN THE IOWA DISTRICT COURT IN AND FOR SAC COUNTY

(Magistrate Division)

IN THE MATTER OF AN APPLICATION  
FOR A SEARCH WARRANT FOR THE  
RESIDENCE AT 4221 155<sup>TH</sup> STREET,  
URBANDALE, IOWA 50323

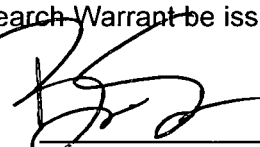
SEARCH WARRANT APPLICATION

COMES NOW, the State of Iowa, through Sac County Attorney (SCA) Ben Smith, and being duly sworn on oath, states the following:

That at 4221 155<sup>TH</sup> STREET, URBANDALE, IOWA 50323, the residence of ANNA RICHTER, at which there are computers and other electronic storage devices that contain information / documents (digital media) all of which are identified in Attachments A and B to this Search Warrant Application and / or were used to facilitate / commit the crimes listed in the Affidavit.

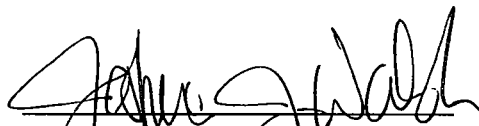
That said property / information is relevant and material as evidence in a criminal prosecution. That the facts establishing the foregoing ground(s) for issuance of a search warrant are as set forth in the affidavit and attachments, which, by this reference, are made by part of this Search Warrant Application.

WHEREFORE, the undersigned asks that a Search Warrant be issued.



BEN SMITH  
SAC COUNTY ATTORNEY

Subscribed and sworn to before me July 7<sup>th</sup> 2014.



MAGISTRATE / JUDGE

IN THE IOWA DISTRICT COURT IN AND FOR SAC COUNTY

(Magistrate Division)

IN THE MATTER OF AN APPLICATION  
FOR A SEARCH WARRANT FOR THE  
RESIDENCE AT 4221 155<sup>TH</sup> STREET,  
URBANDALE, IOWA 50323

SEARCH WARRANT APPLICATION:  
AFFIDAVIT

COMES NOW, Sac County Attorney (SCA) Ben Smith, and being duly sworn on oath, states the following:

Your applicant has been the elected prosecutor in Sac County, Iowa, for close to four years. The Iowa Supreme Court has found that the County Attorney can apply for a search warrant. State v. Jensen, 189 N.W.2d 919 (1971) Three years prior, your applicant worked for the Iowa Attorney General's Office as an Assistant Attorney General (AAG) assigned to represent the State of Iowa's Child Support Recovery Unit. In the last three years, your applicant has drafted numerous search warrants, and has conducted numerous county attorney investigations per Rule 2.5(6), including, two "cold case" homicide / murder investigations, both of which resulted in arrests being made. The investigation into these matters began in April 2012, when your affiant was first contacted by Laguna Beach, California, resident DARREN MITCHELL MEADE (DOB: January 3, 1967).

During this investigation, your applicant listened to hundreds of hours of recorded phone conversations between TRACEY RICHTER and her friends and family, which made from either the Sac County Jail in Sac City, Iowa, or the Iowa Women's Prison in Mitchellville, Iowa, as well as audio recordings of conversations between TRACEY RICHTER and her family and friends during their prison visits. Additionally, your applicant has issued over 100 Rule 2.5(6) County Attorney Investigatory Subpoenas Duces Tecum in furtherance of this investigation and has obtained and reviewed thousands of documents, and has spoken with numerous witnesses. In total, your applicant has spent well over 1,500 hours investigating / working on this case.

The facts alleged and information contained in this affidavit come from your affiants personal observations, training, experience, and research, as well as the same from other law enforcement officials / investigators and licensed private investigators. The facts alleged and information contained herein are made and set forth to the best of my ability with the information available to me at the time. Your applicant has given his best efforts to ensure the information contained in this application is accurate and reliable, however, considering the incredible complexities and the general subject matter of the case, it is possible for there

to be inadvertent, factual inaccuracies. Lastly, this affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and DOES NOT set forth all of my knowledge about this matter.

Your applicant is actively investigating the following crimes: Ongoing Criminal Conduct, a Class "B" Felony (IOWA CODE § 706A.2); Conspiracy, a Class "D" Felony (IOWA CODE § 706.1); Solicitation, a Class "D" Felony; Extortion (IOWA CODE § 705.1), a Class "D" Felony (IOWA CODE § 711.4); and Witness Tampering, an Aggravated Misdemeanor (IOWA CODE § 720.4), Facilitation of A Criminal Network By Attempting To Induce A Witness" commits a Class "B" Felony. IOWA CODE § 706A.2 (2013)

I make this affidavit in support of an application for a search warrant for the items and information set forth in Attachments A and B to this Search Warrant Application.

IMPORTANT NOTE ABOUT THE CHRONOLOGY OF EVENTS AS OUTLINED IN THIS AFFIDAVIT: Where possible, the events described herein are laid out in strict chronological order. However, due to the complexity of the case, and the number of different timeline arcs, in some instances, a series of related events that extend over long periods of time are nested together so as to improve comprehension and readability; thereafter, the normal timeline will resume. Consequently, the last incident described in a nested event may be for a date that comes after the next incident described in the general timeline.

Unless specifically stated otherwise, all conversations referenced herein, to which TRACEY RICHTER is a party, were initiated by TRACEY RICHTER from a prison phone at the Iowa women's prison in Mitchellville, Iowa.

TRACEY RICHTER and Dr. John Pitman were married on or around August 14, 1988. On February 1, 1990, TRACEY RICHTER (then Tracey Pitman) gave birth to Dr. John Pitman's son, BERT PITMAN. On or around June 1992 not long after Dr. John Pitman believed TRACEY RICHTER tried to kill him for the second time, the two separated. Shortly after their separation, TRACEY RICHTER filed for divorce from Dr. John Pitman. Not long into their divorce proceedings, TRACEY RICHTER, accused Dr. John Pitman of molesting their son, BERT PITMAN. Soon after TRACEY RICHTER made this accusation, flyers were placed on most of the cars at Northwestern Memorial Hospital, the hospital Dr. John Pitman was working for at the time, which stated that Dr. John Pitman had been found to be a child molester. TRACEY RICHTER later said she did not place the flyers on the car, but the person who did was someone with whom she was close.

TRACEY RICHTER and Dr. John Pitman's divorce proceedings lasted close to six years. During the proceedings, Dr. John Pitman was able to prove, among many other things, that a signature purporting to be his that was affixed to an insurance policy taken out on his life

was forged. Later in these proceedings it was proven that TRACEY RICHTER had falsely accused Dr. John Pitman of molesting BERT PITMAN. Despite the foregoing, when the divorce / custody matters were finalized, the two stipulated that they would split joint legal custody, that TRACEY RICHTER would be the primary physical caretaker, and that Dr. John Pitman would get liberal visitation rights.

TRACEY RICHTER and Michael Roberts were married in Australia in 1996. Michael Roberts, an Australian, moved to the United States (Chicago, Illinois) after he married TRACEY RICHTER. Two children, N.R. and M.R., were born to their marriage. N.R. and M.R. are dual citizens of the United States and Australia.

In 1998, TRACEY RICHTER, Michael Roberts, BERT PITMAN, and N.R. moved from Chicago, Illinois, to Early, Iowa (Sac County).

In 2000, TRACEY RICHTER again accused Dr. John Pitman of molesting BERT PITMAN. Dr. John Pitman responded by asking the courts for full custody of BERT PITMAN. Following a thorough investigation, it was determined that TRACEY RICHTER's new sex abuse allegation against Dr. John Pitman was unfounded, possibly fabricated.

On December 13, 2001, days before the custody modification proceedings were set to begin, TRACEY RICHTER shot and killed 20-year-old Dustin Wehde after she was allegedly attacked in her home by Dustin Wehde and an unknown second intruder who escaped (although, when law enforcement first arrived at the scene, TRACEY RICHTER told them there had been three intruders).

The evidence recovered at the scene indicated TRACEY RICHTER, using two different pistols, fired eleven shots at Dustin Wehde, nine of which struck him. The autopsy of Dustin Wehde's body revealed three of these nine shots entered through the back of his head in a tightly grouped pattern. A blood spatter expert would later testify the last of the three shots fired into the back of Dustin Wehde's head was fired fifteen minutes after the first two while his head was resting on the ground. Hours after this incident, law enforcement found a pink spiral notebook in Dustin Wehde's car. The notebook contained what appeared to be a journal or diary in Dustin Wehde's handwriting, in which Dustin Wehde had written that he was hired by Dr. John Pitman and Dr. John Pitman's divorce / custody attorney, Stephen Komie, to stalk, harass, and ultimately murder TRACEY RICHTER, BERT PITMAN, as well as other bits of information that suggested Dr. John Pitman was ultimately responsible for this (alleged) home invasion / attempt on TRACEY RICHTER's life. Additionally, notebook contained a series of numbers.

The few law enforcement officials who knew of the notebook's existence, decided not to disclose its existence to anyone, including TRACEY RICHTER.

About two months after she shot and killed Dustin Wehde, TRACEY RICHTER told her then-friend, Mary Higgins, that law enforcement had told her (TRACEY RICHTER) it found a notebook in Dustin Wehde's car that proved Dr. John Pitman was behind the attack, and that Dr. John Pitman was going to be arrested soon.

Dr. John Pitman was never arrested, and law enforcement did not publicly disclose the notebook's existence until after TRACEY RICHTER was arrested for murdering Dustin Wehde. However, as discussed below, in the ten years between Dustin Wehde's murder and TRACEY RICHTER's arrest for his murder, TRACEY RICHTER would openly discuss the notebook and its contents.

On February 13, 2002, TRACEY RICHTER sent a letter to Lieutenant Dennis Cessford, the Sac County Sheriff's Deputy ("LT Cessford") assigned to investigate Dustin Wehde's death. In this letter, TRACEY RICHTER asked the Deputy whether law enforcement had interviewed Dr. John Pitman, and provided a list of reasons why TRACEY RICHTER believed Dr. John Pitman and his attorney, Stephen Komie, could be responsible for the alleged home invasion. TRACEY RICHTER also told the Deputy that she would be able to identify the alleged second intruder if shown his picture.

On February 15, 2002, TRACEY RICHTER wrote the following in an e-mail to LT Cessford:

[Dr. John Pitman] may be required to come in for a deposition [in their custody proceedings] in the near future. If we can get him in, we will let you know. If you want to speak in confidence to my attorney, and give her some questions to ask [Dr. John Pitman], we will. I doubt he will agree to an interview. [Dr. John Pitman] has not contacted [BERT PITMAN since the alleged home invasion], which is strange.

On February 21, 2002, TRACEY RICHTER **REFUSED** to assist investigators in developing a composite sketch of the second individual she alleged had invaded her home with Dustin Wehde on December 13, 2011, and attacked her.

On March 20, 2002, TRACEY RICHTER asked LT Cessford where law enforcement had any information that connected Dr. John Pitman to Dustin Wehde.

On June 9, 2002, TRACEY RICHTER wrote the following in a letter to LT Cessford: "Are you in a position to reveal to us the nature of the link between Steven Komie and the Wehde household?"

On November 28, 2002, Dustin Wehde's father, Brett Wehde, committed suicide near his son's (Dustin Wehde) In a note he left behind, Brett Wehde wrote that his "heart was broken" on [December 13, 2001], the day TRACEY RICHTER shot and killed Dustin Wehde, and that [he cried] every day since [December 13, 2001].

On December 30, 2002, TRACEY RICHTER wrote a letter to Mona Wehde (Dustin

Wehde's mother and Brett Wehde's wife) wherein TRACEY RICHTER accused Mona Wehde of conspiring with Dr. John Pitman to have Dustin Wehde attack her, and chastised Mona Wehde for being a horrible wife to her late husband,

On October 13, 2003, Dustin Wehde's Estate filed a wrongful death lawsuit against TRACEY RICHTER. Wehde Estate v. Tracey [Richter], Sac County District Court, Case No. LACV018486.

On April 23, 2004, Michael Roberts filed for divorce from TRACEY RICHTER. Michael Roberts v. Tracey [Roberts], Buena Vista County District Court, Case No. CDCD002755. TRACEY RICHTER was given temporary custody of their children, N.R. and M.R. Much like TRACEY RICHTER's divorce with Dr. John Pitman, the custody / divorce proceedings that followed Michael Roberts and TRACEY RICHTER's separation were contentious and protracted.

On May 18, 2004, TRACEY RICHTER came into the Sac County Sheriff's Office, and asked to speak with Sac County Sheriff Ken McClure. The following is Sheriff Ken McClure's report regarding this incident:

Tracey [Richter] told me she had some information that she felt I needed to know. Tracey [Richter] told me that her husband, Michael Roberts, talks in his sleep, and while he talks in his sleep, Tracey is able to ask him questions. TRACEY RICHTER told me that on numerous occasions, Michael would talk about a journal and how this journal would "cover his ass." TRACEY RICHTER also said that Michael Roberts told her [in his sleep] that the contents of this journal concerned Tracey [Richter's] ex-husband John Pittman. When talking about the Journal, Tracey [Richter] would cry and talk about for short time, and then she would start talking about something else. Tracey [Richter] said that she asked Michael about where this journal was because she had never seen it. Tracey [Richter] told me that [Michael Roberts] told her while he was sleeping that last time he saw the Journal, Dustin had it. On another occasion, Tracey [Richter] said that [Michael Roberts] was talking in his sleep about how in case they got caught, [the journal] would cover him. Tracey [Richter] told me that when she asked who these people were, Michael became coherent and woke up. Tracey [Richter] said that she had even on one occasion awakened her son BERT [PITMAN], and had him come into the bedroom and listen to Michael Roberts talking in his sleep about this journal.. Tracey [Richter] said she had never seen this journal.

On May 19, 2004, TRACEY RICHTER left the following in a voicemail to one of Michael Roberts's co-workers:

I mean if [Michael Roberts] wants to be with someone else just say he wants to be with someone else, but don't try to turn me (TRACEY RICHTER) into a monster by saying that I'm trying to kill him and all of this horrible ridiculous stuff. I am now convinced that he did have something to do with the attack and I am convinced based on his behavior...that he

absolutely refuses to pay any child support...he refuses to pay the maintenance that he agreed to pay me...the fact that he is making up these horrendous, horrible stories about me trying to kill him...the fact that he is, you know, doing sneaky stuff with [their business] to protect his assets...I don't know who he is and I do now believe, I just met with the sheriff um last week, I do believe now with all of my heart that he had something to do with the attack on me, because he has become a complete stranger to me, you know, if he doesn't want to be with me just say that he's in love with someone else, he wants to start a new life...but don't make up these ridiculous stories about me... and I am now convinced and that is the tool that I will be using against him because I will use his own actions against him, I don't have to make stuff up about him, I will make sure that because of everything that he has done... that he pays for his crimes... he pays for the attack on me and that he ultimately will go to jail and that the rest of his life will be spent in jail as the result of trying to have me killed...he has proved himself to be mentally unstable person, he has proved himself to be a stranger, and I am now convinced that he did have something to do with it and I will make sure if there is anything in my power that's honest and truthful, you know, to make sure, I'm not going to lie or anything like that, but to make sure that he does pay for his sins and that he suffers the consequences of his actions...you know, unless he were all of a sudden to have a change of heart and apologize and say that all of this stuff that he has been doing that he's been behaving and doesn't know what it is...he's a stranger to me, and that he's a monster and that... he's a danger and a menace to society to have him out there... that also means letting everyone in (inaudible) know that he was involved in the attack.

On March 2, 2005, because Dustin Wehde's Estate ran out of money to take the case to trial, and because TRACEY RICHTER was judgment proof, the Dustin Wehde's Estate moved to dismiss its wrongful death case against TRACEY RICHTER.

On March 2, 2005, the same day the civil wrongful death lawsuit against her had been dismissed, TRACEY RICHTER wrote the following in an e-mail to Sac County Sheriff Ken McClure:

I heard from one of our experts that a notebook of Dustin's was found that contained notes about me. Is there any chance of my attorney getting a copy. It may be relevant to our divorce case. If you are worried that confidential information might get released, we can agree to have the Judge review the item in chambers and decide if it is related.

On March 3, 2005, TRACEY RICHTER wrote the following in an e-mail to Sac County Sheriff Ken McClure: "I just got of the phone with [my civil attorney] who told me that Dustin Wehde's notebook contained details about the Dentist in Chicago. I never told anyone about that."

On March 10, 2005, TRACEY RICHTER wrote the following in an e-mail to Sac County Sheriff Ken McClure:

My lawyer in Des Moines told me that one of the DCI reports reported a daily log of

Dustin's on an inventory list. When he inquired about it, he was told that it contained "disturbing personal information about me" he also was told it included "gibberish?" I was particularly upset that I had not been told about this previously. Was Dustin being paid to watch me and track my activities? If so, by, whom? Or was Dustin obsessed with me and watching me for personal reasons? Forgive me for being upset, but finding out that you were being stalked and that you were not told about it is kind of weird. Considering the events of [December 13, 2011], I kind of think that might be related.

On March 11, 2005, TRACEY RICHTER wrote the following in an e-mail to Sheriff Ken McClure:

I met with Mary Higgins today. She spoke with Robin from Crossroads, who told her that the notebook was found by [Mona Wehde] in their house NOT in the car as my attorney stated. She also stated that [Mona Wehde] showed it to Robin and [Michael Roberts] before turning it in. Supposedly it contained numbers in addition to information relating to my son [BERT PITMAN] and myself. Is there any evidence to suggest they conspired together and used Dustin? They would have known Mike would be a suspect, so Dustin would eventually have to take the fall so Mike would be off the hook. I wouldn't put it past [Michael Roberts] using both of them so he would be off the hook.

On March 13, 2005, TRACEY RICHTER sent the following in a facsimile to Sheriff Ken McClure:

I reviewed the report and it clearly states the daily log of Dustin's was found in the car and taken to DCI. If this is true, how did [Mona Wehde] and Robyn spend days going through Dustin's notebook that was found in his home??? Are there 2? Did [Mona Wehde] ever turn hers [in to] the DCI or did she bury it because it incriminated Dustin Wehde?

On March 15, 2005, TRACEY RICHTER wrote the following in an e-mail to Sheriff Ken McClure: "The second notebook that Mona found contained a bunch of numbers according to Robin at Crossroads. Could those numbers be bank account numbers? Passwords? Routing numbers? PIN's?"

On July 18, 2005, TRACEY RICHTER wrote the following in facsimile to Sheriff Ken McClure and then-Sac County Attorney Earl Hardisty: "I sincerely hope you really don't believe there wasn't a second man because then you won't look for him and if you won't look for him you can't find him. You have to find him, he has all the answers."

In 2008, the Court awarded TRACEY RICHTER full custody of N.R. and M.R., and Michael Roberts was given liberal visitation rights. Immediately following TRACEY RICHTER and Michael Roberts' separation in 2004, TRACEY RICHTER, her family, and her friends began a coordinated effort to publicly accuse Michael Roberts of planning the (alleged) home invasion / being criminally responsible for Dustin Wehde's death, in effort to give TRACEY RICHTER an advantage over Michael Roberts in the couple's pending divorce / custody



proceedings.

On December 4, 2007, TRACEY RICHTER and Michael Roberts received an interlocutory divorce. In 2008, Michael Roberts married Dr. [REDACTED] (aka [REDACTED] Roberts).

Michael Roberts has alleged that TRACEY RICHTER attempted to kill him three times in the four years that followed their separation. In fact, the State of Iowa's victim's compensation program reimbursed Michael Roberts for damages he sustained as a result of one of these three alleged attempts.

On or around October 22, 2007, during one of their numerous hearings in Buena Vista County District Court Case No. CDCD002755, TRACEY RICHTER entered a letter into evidence which she testified was sent to her by the Consulate General of Finland in Los Angeles. The letter said that the Consulate General of Finland had forwarded documents sent to it by TRACEY RICHTER concerning the legality of Michael Roberts' marriage to Dr. [REDACTED] (citizen of Finland). The letter further stated that "falsifying documents and committing fraud to obtain a Finnish visa or commit bigamy is a serious criminal offense for both Mr. Roberts and Dr. [REDACTED]." TRACEY RICHTER testified at this hearing that this letter was genuine and that she received it in the mail or by fax.

On November 8, 2007, the real Consulate General of Finland provided a letter stating that the above-mentioned letter purporting to be from the Consulate General of Finland, which TRACEY RICHTER entered into evidence, was fraudulent.

On January 31, 2008, the Court entered its final order in Michael Roberts and TRACEY RICHTER's custody / child support case (a year or two prior, the Court entered an order legally divorcing the two). Although the Court awarded TRACEY RICHTER primary custody of N.R. and M.R., the Court stated the following in its findings:

Tracey is very deviceful; She usually has a plan or scheme to effect a purpose. The following incidents establish crafty schemes by Tracey: (a) One week after Michael filed the petition for dissolution of marriage, Tracey filed a petition for relief from domestic abuse. As a result of the filing of this petition, a temporary protective order was entered. No evidentiary hearing was ever held to establish that Michael committed domestic abuse assault, as asserted by Tracey. The timing of the petition for relief from domestic abuse, filed by Tracey, and her failure to proceed to final hearing on her petition, leads the Court to believe that Tracey used this process in an attempt to gain advantage over Michael on the custodial issue; (b) Tracey has made attempts to establish that Michael has committed child abuse. [REDACTED]

[REDACTED] This was reported to DHS and resulted in an unfounded report. At the trial on the custodial matter, Tracey did not contend that this activity constituted child abuse. In fact,

she conceded that it was not child abuse. Later, Tracey made vigorous attempts to obtain a founded report as a result of this incident; (c) All three children were attending St. Mary's School. [REDACTED] had a bruise on his back. Bert went to [REDACTED]'s teacher and told her about the bruise on [REDACTED]'s back. The teacher is a mandatory reporter, and a report was made to the Department of Human Services. An investigation was conducted. [REDACTED] informed both the teacher and the caseworker for the Department of Human Services that the mark on his back was the result of a bicycle accident. This resulted in an unfounded report. Tracey, instead of making a report of child abuse on [REDACTED], as a result of the bruise on his back, involves her son Bert and has him bring this to the attention of Noah's teacher. Tracey knew this would result in an investigation being conducted. It is quite apparent Tracey knew all along the source of [REDACTED]'s injury; (d) When Tracey was made aware that Michael had a favorable report regarding custody from Bethany Christian Services, she made complaints to Bethany personnel to attempt to change the report. The involvement with Bethany was made by Michael to determine his capabilities of being a custodial parent. It was not his intent that Tracey be involved in the preparation of the report, but by complaining she convinced other personnel of Bethany that she should be interviewed as well as her supporters.

On or around July 17, 2008, TRACEY RICHTER alleged there was a website that contained a nude image of TRACEY RICHTER and that Michael Roberts and or his wife, Dr. [REDACTED] [REDACTED] was responsible. The image was of a nude female with TRACEY RICHTER's face photo shopped on top of the picture of the nude female. It was later determined that TRACEY RICHTER used Michael Roberts' checking account to create the website on which this photo shopped image was published. Although no criminal charges (identity theft) were filed against TRACEY RICHTER, following a forensic examination of her computer that law enforcement seized from her apartment in May 2009, pursuant to a search warrant, law enforcement found the original digital image was used to create the nude photo shopped image of TRACEY RICHTER that was published on the website she

In the middle of 2008, TRACEY RICHTER and her and Michael Roberts' children, N.R. and M.R. moved to Omaha, Nebraska. Shortly thereafter, Michael Roberts moved to nearby Papillion, Nebraska, to be close to his children.

On December 29, 2008, TRACEY RICHTER wrote the following in an e-mail to Iowa Division of Criminal Investigation (DCI) Special Agent (SA) Trent Vileta (SA Vileta): "[Michael Roberts] told me about a premonition from God that would solve all our problems. He said that Mona would find proof that John Pitman tried to kill me and this would allow both Mona and Mike to sue John Pitman."

On January 27, 2009, Michael Roberts received a temporary restraining order against TRACEY RICHTER from the Sarpy County District Court. On January 29, 2009, Michael Roberts was actively participating in the State of Nebraska's Victims of Domestic

Abuse Address Confidentiality Program, which, among other things, provided him with a State Government mailing address, which allowed him to keep his residential address a secret.

On February 6, 2009, TRACEY RICHTER wrote the following in an e-mail to DCI SA Vileta:

Once when [Michael Roberts] was working with [Dustin Wehde] and supposedly "encouraging" him to write, he had him write about being a hitman. Oh, great! That's a really good idea. We now know that [Michael Roberts] knew [Dustin Wehde] was violent. [Michael Roberts's] admits it. Let's encourage him to fantasize about killing for hire. Yes, let's glamourize unthinkable behavior.

On April 19, 2010, TRACEY RICHTER was convicted of felony fraud in the Douglas County District Court, Omaha Nebraska. State v. Richter, Douglas County (Omaha, Nebraska) District Court Case No. CR 09 13186.

On or around July 27, 2010, TRACEY RICHTER was convicted of felony perjury in the Clay County District Court in Iowa. State v. Richter, Clay County District Court Case No. FECR014399

Sometime in 2010, TRACEY RICHTER reported to the FBI that Michael Roberts had once been a close personal friend and associate of alleged international super cyber criminal JULIAN ASSANGE, the founder of Wikileaks.org, and that the two had engaged in all sorts of nefarious conduct.

On June 7, 2011, the FBI interviewed TRACEY RICHTER about her allegations concerning Michael Roberts' supposed relationship with JULIAN ASSANGE. During the interview, TRACEY RICHTER began discussing the December 13, 2011, (alleged) home invasion and shooting death of Dustin Wehde. Specifically, TRACEY RICHTER told the FBI SA that she had a friend in Early, Iowa, named Mary Higgins. TRACEY RICHTER said that Mary Higgins and TRACEY RICHTER had a conversation about Dustin Wehde's attack on TRACEY RICHTER some time after the attack. TRACEY RICHTER said that Mary Higgins told her somebody involved in the investigation told her (Mary Higgins) that the police found a "diary or journal" during their investigation, which contained personal information regarding TRACEY RICHTER. TRACEY RICHTER said Mary Higgins did not say who it was involved in the investigation who told her (Mary Higgins) this information.

On July 14, 2011, TRACEY RICHTER again told an FBI SA that Mary Higgins was told by somebody associated with the aforementioned investigation that the police found a journal, and that the journal contained personal information about TRACEY RICHTER.

On July 27, 2011, TRACEY RICHTER was arrested for the December 13, 2001, murder of 20-year-old Dustin Wehde. State v. Richter, Sac County District Court Case No.

FECR011900.

The Sac County Sheriff's criminal complaint and arrest warrant alleged TRACEY RICHTER had knowledge of a piece of evidence that was found in Dustin Wehde's car following the murder / alleged home invasion, the existence of which was never publicly disclosed by law enforcement. The complaint further alleged the following:

[TRACEY RICHTER's] communications with law enforcement and other individuals since the murder strongly indicates [TRACEY RICHTER] not only had knowledge this piece of evidence existed, but that she manufactured and planted the same in Wehde's vehicle after the murder to make it appear as if Wehde was a home invader. Specifically, and most recently, [TRACEY RICHTER] discussed this piece of evidence in detail with the FBI. Additionally, a witness has recently come forward and has [said that TRACEY RICHTER] described this piece of evidence to the witness in early 2002.

The day TRACEY RICHTER was arrested, TRACEY RICHTER's mother, ANNA RICHTER, said the following in a message she left on the Sac County Attorney's Office answering machine: "You have destroyed a family," and "I have nothing left to lose."

In the days that followed TRACEY RICHTER's arrest for Dustin Wehde's murder on July 27, 2011, while in the Douglas County Jail, TRACEY RICHTER directed her fiancé, RUSSELL SCHERTZ, and mother, ANNA RICHTER, to contact State's witness Mary Higgins. TRACEY RICHTER told ANNA RICHTER and RUSSELL SCHERTZ that Mary Higgins had once told her about a journal implicating her first husband, Dr. John Pitman, in the alleged December 13, 2001, home invasion. ANNA RICHTER repeatedly tried to contact Mary Higgins in the weeks that followed TRACEY RICHTER's arrest.

On July 28, 2011, while in the Douglas County (Omaha, Nebraska) Jail, TRACEY RICHTER and ANNA RICHTER had the following conversation:

TRACEY RICHTER: Yeah. I think -- but I do think it's important that you call Mary Higgins because -- see, and then it says about-- that I discussed the evidence in detail with the FBI. And I didn't -- I don't think I discussed anything in detail with the FBI --

ANNA RICHTER: It's just really weird. It's just -- I tried calling [Mary Higgins] and nobody answered. And she has -- she doesn't have an answering service. So I'll try calling tonight.

TRACEY RICHTER: Because the only -- the only evidence that -- like -- the only evidence that I learned about afterwards from -- Mary Higgins told me that someone she knew close to the case, um, told her that they found something that Dustin had like -- I don't know -- notes or a diary or something with information in it about me. That was it.

Then, TRACEY RICHTER's fiancé, RUSSELL SCHERTZ, got on the phone, and TRACEY RICHTER told him the following:

But when I read [the criminal complaint], I'm like trying to rack my brain to think what it could be, like what -- the only thing I can talk about -- I mean think about that the FBI guy asked me about specifically was he asked me about something my girlfriend Mary Higgins told me about, which was that someone told her close to the case that they had found something, and but -- and I remember being -- sitting at my mom's when she called me about that. But I don't remember if it was like -- because after the attack, I spent some time at my mom's (ANNA RICHTER). But I don't remember if it was then or if it was much later, like sometime after [Michael Roberts] and I separated and we were like visiting my mom.

Towards the end of the conversation, TRACEY RICHTER again told RUSSELL SCHERTZ to have her mother, ANNA RICHTER, contact State's witness Mary Higgins:

Yeah. And make sure -- make sure my mom calls Mary Higgins and finds out who told her, um, about what she had told me about; okay? - Yeah. And tell my mom to tell her it's not a question of someone getting in trouble. This is -- this is a big deal now, you know.

RUSSELL SCHERTZ asked TRACEY RICHTER, "and you want me to ask [Mary Higgins] what?" And TRACEY RICHTER gave the following answer:

[Mary Higgins needed to tell RUSSELL SCHERTZ and ANNA RICHTER] who told [Mary Higgins] about what she told [TRACEY RICHTER] about. - And that [ANNA RICHTER] needs to stress [to Mary Higgins] that it's important, because like if they're going to say I knew about something that I shouldn't have known about and so then that by default means that I was involved, I mean Mary needs to come forward and say who said it to her.

In one of the phone calls she made from the Douglas County Jail (Omaha) while awaiting extradition to Iowa, TRACEY RICHTER tried to get her mother, ANNA RICHTER, to agree that ANNA RICHTER was present when Mary Higgins told TRACEY RICHTER about the notebook. Later, during TRACEY RICHTER's murder trial, ANNA RICHTER attempted to testify to this.

In the week that followed this conversation, ANNA RICHTER called the Higgins' residence numerous times, but no one answered or returned ANNA RICHTER's calls.

Since this arrest, TRACEY RICHTER has been continuously incarcerated in either the Douglas County Jail, Sac County Jail, or an Iowa prison.

On August 5, 2011, Sac County Attorney (SCA) Ben Smith filed the Trial Information against TRACEY RICHTER. State v. Richter, Sac County District Court Case No. FECR011900. SCA prosecuted and Assistant Attorney General (AAG) from the Iowa Attorney General's Office, prosecuted the case.

On August 6, 2011, BERT PITMAN said the following to Donna Bistrican in a Facebook message: I am in Chicago right now. I would love to see you. Is [your home] on the way to Omaha? In response, Donna Bistrican told BERT PITMAN not to Omaha until TRACEY

RICHTER's lawyers [told BERT PITMAN it was okay to do so]." Donna Bistrican then told BERT PITMAN to call her.

Immediately following TRACEY RICHTER's arrest, Michael Roberts took custody of their children, N.R. and M.R., and moved to California where he was enrolled in the State of California's victim protection program. Save for a few monitored calls Michael Roberts allowed TRACEY RICHTER to have with their children, Michael Roberts did not allow TRACEY RICHTER and her family to have any contact / communication with his children, mostly because TRACEY RICHTER and her family continued to blame Michael Roberts for TRACEY RICHTER's plights. In the few instances where he did allow TRACEY RICHTER to speak to the children over the phone, he had to abruptly end the calls because TRACEY RICHTER, rather than engage her children in a meaningful, motherly conversation, instead probed them for information and details as to their current whereabouts.

On November 7, 2011, a Webster County, Iowa, jury convicted TRACEY RICHTER for the first degree murder of Dustin Wehde. The following non-exhaustive list of persons either were listed as witnesses in the State's Trial Information and / or testified against TRACEY RICHTER at her murder trial: Dr. John Pitman, Mary Higgins, Mona Wehde, Ashley Wehde, Raymond Friedman, Marie Friedman, Michael Roberts, and Jeremy Collins (collectively "State's witnesses").

As mentioned earlier, during the trial, ANNA RICHTER tried to testify that Mary Higgins was the one who told TRACEY RICHTER about the existence of the pink spiral notebook (not the other way around as Mary Higgins had testified). ANNA RICHTER was not able finish her story because the State made a hearsay objection to the question / her answer, which the Court sustained.

On December 3, 2011, just days before she was to be sentenced, TRACEY RICHTER and her mother, ANNA RICHTER, were caught trying to solicit fraudulent testimony from this convicted child molester in effort to get TRACEY RICHTER a new murder trial. Specifically, TRACEY RICHTER wrote the following in letters to the convicted child molester:

"I pray for a miracle and [interviewed with] [Dateline NBC] hoping it would cause someone to come forward with helpful information"; "You need to understand that I am guarded. I used to...trust people until they gave me a reason not to trust them. That has changed. Now my trust must be earned over time and actions speak louder than words"; "I'm not sure whether your friend was following the [murder case] out of sheer curiosity or he knows something. If he does [tell him] the statute of limitations has run out on assault and burglary so he has nothing to lose if something feels bad and wants to come forward [and] wants to do the right thing"; "there is the possibility there was a 'lookout' person [in addition to the three others TRACEY RICHTER alleged were responsible for Dustin Wehde's murder], too. My lawyer has the contact details [for Dateline NBC] if your friend knows anything he wants to share.

I'm sure God would bless anyone brave enough to come forward."

On December 5, 2011, TRACEY RICHTER was sentenced to life in prison without the possibility of parole.

As demonstrated below, beginning December 2011 / January 2012, through as recently as June 23, 2014, DARREN MEADE, TRACEY RICHTER, ED MAGEDSON, ANNA RICHTER, and others have been publishing defamatory and harassing stories about the State's witnesses on literally millions of webpages. These defamatory stories and comments accuse the State's witnesses of theft, perjury, fraud, computer hacking, child molestation, murder, and terrorism.

.....  
DARREN MEADE

DARREN MEADE is a forty-seven-year old resident of Laguna Beach, California. DARREN MEADE held the position of CEO of Progenex Dairy Bioactives, a Delaware company, from July 2010 through February 2011. During this period of time, he willfully and enthusiastically participated in a criminal conspiracy to embezzle in excess of one million dollars of the company's funds in pursuit of an exclusive license agreement allowing access to and the use of an illegal structure query language (SQL) injection script capable of removing online consumer complaint reports from existing "gripe" websites such as RipOffReport.com, Blogspot.com and others.

On or around November 7, 2007, ADAM ZUCKERMAN was convicted for his role as the principal organizer in a fraudulent 20-plus million dollar bank leasing scheme, which the US Department of Justice (USDOJ) named "Operation Lease Fleece." Following his conviction, while awaiting sentencing for his role as the principal organizer in the aforementioned leasing scheme, ADAM ZUCKERMAN was on supervised released with U.S. Pretrial Services. <http://www.justice.gov/usao/cac/Pressroom/pr2007/141.html>

In November 2009, Dr. Scott Connelly, unaware of ADAM ZUCKERMAN's past, entered into an investment agreement with ADAM ZUCKERMAN's company, VenturePharma, in order to raise investment capital to fuel a medical research and development venture that Dr. Scott Connelly's company, Progenex, had developed.

Throughout Dr. Connelly's contact with ADAM ZUCKERMAN, which was between 2009 and 2010, ADAM ZUCKERMAN dropped his surname and used the alias "ADAM STUART" in a deliberate effort to conceal his status as a convicted felon awaiting sentencing for his role

as the principal organizer in the 20-plus million dollar fraudulent leasing scheme. When ADAM ZUCKERMAN's true identity and status as a convicted felon awaiting sentencing was revealed to Dr. Scott Connelly, which was in April 2010, Dr. Scott Connelly resigned as CEO of Progenex, moved to rescind the investment deal, and initiated a series of disclosures concerning ADAM ZUCKERMAN's fraud to the Santa Ana, California branch offices of the United States Attorney's Office Attorney and the FBI.

In an attempt to prevent his fraudulent actions from becoming known to federal authorities, ADAM ZUCKERMAN launched a preemptive, vexatious civil action against Dr. Scott Connelly to deflect his personal culpability in the creation of the investment fraud. When his expected result of a quick settlement and exhaustive non-disclosure agreement did not materialize, ADAM ZUCKERMAN instigated a systematic online defamation campaign against Dr. Scott Connelly in the hopes that the publication of these libelous and untruthful allegations would coerce Dr. Connelly's acquiescence to ADAM ZUCKERMAN's desired cover up. ADAM ZUCKERMAN and his felonious cohorts hired DARREN MITCHELL MEADE as Progenex's CEO to front their group's efforts to harass and intimidate Dr. Scott Connelly. DARREN MEADE would later admit in a two-day deposition that he was hired by ADAM ZUCKERMAN solely for the purpose of harassing and intimidating Dr. Scott Connelly into settling his case civil case with ADAM ZUCKERMAN and ADAM ZUCKERMAN's criminal organization ("the criminal organization" or "criminal accomplices"). ADAM ZUCKERMAN and his criminal organization paid DARREN MEADE a salary and agreed to pay him a \$200,000.00 bonus if he was able to coerce and intimidate Dr. Scott Connelly into settling his civil case against ADAM ZUCKERMAN and his criminal organization. Throughout his tenure as Progenex CEO, DARREN MEADE was fully aware that ADAM ZUCKERMAN had recently been convicted of a multi-million dollar bank leasing scheme and would eventually be incarcerated in a federal prison.

In effort to suppress negative content appearing about them online, which began appearing after Dr. Scott Connelly exposed them, ADAM ZUCKERMAN and DARREN MEADE, using company / Progenex funds, hired Michael Roberts' company, Rexxfield, to help fix / bolster their respective online reputations.

**In February 2011, ADAM ZUCKERMAN, DARREN MEADE, and their criminal accomplices worked to seize control and ownership of Michael Roberts' company, Rexxfield, for the purpose of usurping the rights to an existing contract Rexxfield had with MATTHEW COOKE for the use of an illegal SQL technology, which, when deployed, could effectively remove webpages from the internet.**

ADAM ZUCKERMAN and DARREN MEADE sought to monetize this technology by creating an online reputation management company that would market this illicit technology /SQL

NOTE: This contract was signed before the technique was revealed. An \$18,000 deposit was paid, with the balance of \$18K to be paid upon delivery of the trade secret.

Michael Roberts/Rexxfield, after seeing the details of the technique, became concerned that it may be considered hacking and did not complete the purchase, although 2nd opinions were obtained as to the legality of the methods, including a contact in the FBI for whom Michael Roberts had collaborated on potential foreign hacking threats.



injection hack as an online “reputation management” service that offered to “repair” an unsuspecting customer’s online reputation by removing whatever webpage(s) the customer believed was damaging the customer’s reputation (or the customer’s competitors webpage for that matter), using the above-mentioned SQL hack. ADAM ZUCKERMAN and DARREN MEADE charged up to \$5,000.00 per removal.

Progenex funds were used to negotiate and execute a partnership agreement between ADAM ZUCKERMAN and REXXFIELD, and in Feb 2011, Progenex funds were embezzled to cure an existing default of the REXXFIELD-COOKE agreement. Unbeknownst to REXXFIELD, this partnership agreement granted ADAM ZUCKERMAN, DARREN MEADE, and their accomplices, a sixty-percent (60%) controlling interest in REXXFIELD and transferred the rights to this illicit technology from REXXFIELD to an entity wholly owned by ADAM ZUCKERMAN and his accomplices. Acquiring Michael Roberts’ business and deploying an illegal hacking technology on a mass scale for profit, in addition to being well outside the scope of Progenex’s charter, was patently illegal.

In the latter half of January 2011, DARREN MEADE e-mailed REXXFIELD employee Paul Portelli for the purpose of trying to go behind Michael Roberts’ back to discover the contact information for MATTHEW COOKE (purported inventor and proprietor of this illicit SQL technology) to solicit / court MATTHEW COOKE and his hacking technology away from Michael Roberts / REXXFIELD and into the folds of DARREN MEADE and ADAM ZUCKERMAN’s ongoing criminal enterprise (i.e., cutting out the middle man, Michael Roberts)

On February 19, 2011, DARREN MEADE asked ADAM ZUCKERMAN for the address of Paul Portelli (Michael Roberts’ / REXXFIELD employee) so that DARREN MEADE could go over to Paul Portelli’s home and intimidate him with a 9mm pistol.

On February 20, 2011, DARREN MEADE suggested that he and ADAM ZUCKERMAN should begin publicly accusing Michael Roberts of child molestation to pressure Michael Roberts’ into giving DARREN MEADE and ADAM ZUCKERMAN’s criminal organization the exclusive rights to MATTHEW COOKE’s illicit SQL technology.

On February 20, 2011, in an e-mail to ADAM ZUCKERMAN with the subject heading “Conspiracy Theory Gone Wild,” DARREN MEADE suggested that he and ADAM ZUCKERMAN begin publicly accusing Michael Roberts of hiring Dustin Wehde to kill TRACEY RICHTER (i.e., accuse Michael Roberts of being criminally responsible for Dustin Wehde’s murder) to pressure and leverage Michael Roberts into giving DARREN MEADE and ADAM ZUCKERMAN’s criminal organization the exclusive rights to MATTHEW COOKE’s illicit SQL technology. DARREN MEADE suggested that he and ADAM ZUCKERMAN have lunch the following day and “devise how to play this card” against

**Michael Roberts.**

On February 23, 2011, DARREN MEADE told Paul Portelli that DARREN MEADE was aware of ADAM ZUCKERMAN's criminal history and, despite this, continued to work for ADAM ZUCKERMAN and their criminal organization because they were his "partners" and he (DARREN MEADE) wanted to make "millions" removing RIPOFF REPORT complaints from the internet using MATTHEW COOKE's illicit SQL hack. This is absolute proof DARREN MEADE was aware of ADAM ZUCKERMAN's criminal behavior, and was quite content to assist in covering up the same.

DARREN MEADE continued to actively engage in this conspiracy until February 24, 2011, when he learned that ADAM ZUCKERMAN and his other criminal co-conspirators had usurped the SQL partnership opportunity for themselves and effectively disenfranchised DARREN MEADE from their ongoing criminal endeavors, including their planned development of a reputation management business with MATTHEW COOKE (and his illegal hacking code), which meant DARREN MEADE would no longer receive his weekly CEO "paycheck" from Progenex, and was no longer eligible for the bonus that was contingent on his successfully harassing and defaming witness / litigant Dr. Scott Connelly into submission.

On February 24, 2011, DARREN MEADE reached out to Paul Portelli, the Rexxfield **DARREN MEADE sought intimidate with a 9mm pistol** just five days prior (February 19, 2011), and Michael Roberts, and told them that he (DARREN MEADE) had resigned from Progenex to protect Rexxfield and their interests in the deal with MATTHEW COOKE. Also during this conversation, DARREN MEADE told Michael Roberts and Paul Portelli that he (DARREN MEADE) and ADAM ZUCKERMAN had sold over \$50,000 of "RIPOFF REPORT removals" in just one week. DARREN MEADE told Michael Roberts and Paul Portelli the following about his experience in removing RIPOFF REPORT complaints from the internet for mass profit:

Because when you, you know – I cold-called people to see what would happen is you (inaudible) and we just went on and made phone calls. And you essentially get cussed out initially because they have been hit up by everybody, and some of the people have paid money and nothing happened for them. But then they are all willing to go ahead and move forward and try it out. So if you had it on a larger scale and say you were doing (inaudible) \$500, they could still sell it for 15 to 3,000, you have a lot of revenue. If you did a thousand a month with one wholesaler, that's \$500,000 coming in. What's your overhead on that? A couple months of beating bushes to pull the wholesalers together, and in the interim, you could sit and [could continue to make money removing RIPOFF REPORT complaints yourself].

DARREN MEADE also told the two that the only reason he did not resign sooner was

because he needed Progenex's resources to help repair his online reputation (i.e., money to pay professionals to remove derogatory content about him from the internet), which had been badly damaged after his role in the group's ongoing criminal enterprise had been exposed by its victims. To support this, DARREN MEADE told Michael Roberts and Paul Portelli the following:

I mean, you have to -- you asked me last night why -- why I was still in Progenex, and I said, did you see what happened to my [online] reputation? So if you Google [my name, DARREN MEADE] and Progenex and you start clicking on all the links...and some different websites they have [up about DARREN MEADE's and ADAM ZUCKERMAN's ongoing criminal activities]...they are complete character assassinations. So, for me to be hired as a consultant to work for somebody right now, I would never pass a due diligence.

Also during this conversation, DARREN MEADE told Michael Roberts and Paul Portelli that he (DARREN MEADE) and ADAM ZUCKERMAN planned to "just [remove] RIPOFF REPORT [complaints]...and make a lot of money from it." DARREN MEADE told Michael Roberts and Paul Portelli that he (DARREN MEADE) had a contractual right to MATTHEW COOKE's illicit hacking technology, and that he had "noticed [ADAM ZUCKERMAN]" that he planned to exercise this right. Incredibly, DARREN MEADE told Michael Roberts and Paul Portelli that he was aware ADAM ZUCKERMAN had been using the alias "ADAM STUART" to conceal his true identity from Progenex's shareholders / investors, because said individuals would probably not have been so willing to "invest" in ADAM ZUCKERMAN's new company or Progenex if they knew it was being ran by a convicted felon on pretrial release and was awaiting sentencing for his principal role in a multi-million fraudulent bank leasing scheme. DARREN MEADE also told Paul Portelli and Michael Roberts that ADAM ZUCKERMAN had instructed DARREN MEADE to create "wholesalers that can sell a couple thousand RIPOFF REPORT [removals] per month," and that "they" would sell these wholesalers a one-time "franchise [fee] (for access to the illicit SQL hack) for...\$25,000." At the end of this conversation, DARREN MEADE invited Michael Roberts and Paul Portelli over to his Laguna Beach to continue their discussion.

On February 27, 2011, in what was clearly an effort to intimidate ADAM ZUCKERMAN and DARREN MEADE's other (former) criminal co-conspirators from shying away from the deal with MATTHEW COOKE for the illicit hacking technology, DARREN MEADE, in an announcement on the free press release distribution service www.PRLOG.com, announced his resignation as CEO of Progenex, and in doing so, named ADAM ZUCKERMAN as the company's "major beneficial stakeholder, not "ADAM STUART," the alias DARREN MEADE and the criminal enterprise had been using to conceal ADAM ZUCKERMAN's true identity. In this press release, which DARREN MEADE wrote in the third person, DARREN MEADE said, among other things, that "I cannot in good conscience continue due in part to the

irreconcilable philosophical differences I have with the major beneficial stakeholder ADAM ZUCKERMAN who for the most part controls the company and related entities.”

The evidence shows, however, that the only irreconcilable philosophical difference DARREN MEADE had with his former criminal co-conspirators was that DARREN MEADE believed he was unfairly ousted from the criminal enterprise and that he (DARREN MEADE) alone should have MATTHEW COOKE's illicit hacking technology.

On February 28, 2011, in an e-mail, DARREN MEADE informed MATTHEW COOKE, the inventor / owner of this illicit hacking technology, that he (DARREN MEADE) had a “unilateral non-circumvention agreement” that gave DARREN MEADE a priority claim to MATTHEW COOKE's illicit SQL hack over that of ADAM ZUCKERMAN's criminal organization. DARREN MEADE also informed MATTHEW COOKE that “ALEXANDER BORJIA” (another ADAM ZUCKERMAN alias) was really convicted felon ADAM ZUCKERMAN, and that any further dealings related to the illicit SQL hack between MATTHEW COOKE and ADAM ZUCKERMAN violated DARREN MEADE's contractual rights to the illicit SQL hack.

Later that same day, MATTHEW COOKE, a man with whom DARREN MEADE had extensively communicated in the previous two or three months, responded to DARREN MEADE's above-email as follows: “Dear Mr. Meade, I do know you, nor have I ever been a party to any agreement with you, and I do not appreciate the continuous calls and emails. I expect that this communication is the last of our dealings as we have nothing further to discuss.” Shortly after sending this response to DARREN MEADE, MATTHEW COOKE sent an e-mail to Michael Roberts wherein MATTHEW COOKE admitted that DARREN MEADE (not “a man named DARREN MEADE” or “a DARREN MEADE”) had just sent him a “confusing” e-mail message and referred to DARREN MEADE by his first name, “Darren.”

Following this failed, frenetic attempt to cajole and coerce MATTHEW COOKE and ADAM ZUCKERMAN into letting him back into the criminal enterprise's SQL licensing / RIPOFF REPORT removal scheme, DARREN MEADE, forced to confront the realities bearing down on him (unemployment and being a named defendant in a complex civil fraud proceeding, neither of which could be mitigated if the truth about his actions while acting as the CEO of Progenex were revealed) instigated an ever escalating feigned “whistle-blower” campaign to notify / inform law enforcement and the media of ADAM ZUCKERMAN's (formerly ADAM ZUCKERMAN and DARREN MEADE's) organization's ongoing criminal activities, all in effort to obfuscate his responsibility and involvement for the same crimes, which he had committed alongside them as Progenex's CEO. **However, as the foregoing demonstrates, the ONLY thing responsible for DARREN MEADE's twenty-four hour transformation from degenerate criminal to whistleblowing white knight, was that he learned ADAM**

ZUCKERMAN and his other former co-conspirators had kicked him out of the "deal" and he would no longer have access to MATTHEW COOKE's hacking code to make "millions" removing RIPOFF REPORT complaints.

On March 4, 2011, DARREN MEADE told Michael Roberts that "at the end of the day, [Dr. Scott Connelly] is a [ADAM ZUCKERMAN's victim] just like you, [Michael Roberts]."

On November 21, 2011, DARREN MEADE made a sworn declaration to the Federal Court in which he had stated he intimate knowledge that his former accomplices and co-conspirators, ADAM ZUCKERMAN, KIRK MCMAHAN, and others, had effectively reconstituted their fraudulent BRICKBANC ("Operation Lease Fleece") operations under the name XBANKER while ADAM ZUCKERMAN and KIRK MCMAHAN were on pretrial release with the federal government. Below is an excerpt from DARREN MEADE's sworn declaration:

In late 2010, I was present during a meeting where [ADAM ZUCKERMAN] and KIRK MCMAHAN became very concerned that if the true nature of the activities taking place at XBANKER were revealed they would have a negative impact on their pending sentencing in the BRICKBANC case. As a result they decided to do two things. First, ADAM ZUCKERMAN's mother, MIRIAM ZUCKERMAN, would be prohibited from entering the building and communicating with any XBANKER customers out of a fear that the customers would make a connection between MIRIAM ZUCKERMAN and ADAM ZUCKERMAN and thus reveal his background. Second, XBANKER's operations would have to be shut down by January 2011.

Bank records and other information obtained by law enforcement and other information demonstrates that ADAM ZUCKERMAN, KIRK MCMAHAN, while on pretrial release and awaiting sentencing, along with DARREN MEADE and a handful of others, essentially reconstituted the operations of BRICKBANC ("Operation Lease Fleece") under the name XBANKER.

In the weeks and months that followed his reluctant departure from ADAM ZUCKERMAN's organization, DARREN MEADE, on multiple occasions, told Michael Roberts, Dr. Scott Connelly, the United States Department of Justice, including numerous FBI Special Agents and Assistant United States Attorneys, and others, that he (DARREN MEADE) was duped by ADAM ZUCKERMAN (aka ADAM STUART, aka ALEXANDER BORJIA) and his other former co-conspirators and that Michael Roberts and Dr. Scott Connelly were also victims of ADAM ZUCKERMAN and his organization (which, from June 2010 through February 24, 2011, included DARREN MEADE).

On June 21, 2011, and September 26, 2011, DARREN MEADE was deposed in Connelly v. Does, Superior Court Of The State Of California, County Of Orange, Case No. 30-2011-

00453171. In this deposition, DARREN MEADE testified to the following:

- He (DARREN MEADE) was hired by ADAM ZUCKERMAN to use the internet to defame and harass Dr. Scott Connelly to pressure Dr. Connelly into settling his civil case with ADAM ZUCKERMAN at al. and ending Dr. Scott Connelly's efforts to have law enforcement revoke ADAM ZUCKERMAN's and KIRK MCMAHAN's pretrial release (i.e., harass and defame a witness to obtain some form of advantage over the witness in pending litigation).
- He (DARREN MEADE) was offered premium incentives, both in cash (\$200,000.00) and equity in Progenex, provided his defamation campaign proved successful in securing a settlement from Dr. Scott Connelly.
- Michael Roberts was ADAM ZUCKERMAN's victim, not his co-conspirator, that it was ADAM ZUCKERMAN who threatened his life (not Michael Roberts as DARREN MEADE would later allege).
- He and the above-mentioned convicted felons conspired to use stolen Progenex funds to procure an illicit hacking technology for the purpose of creating a reputation management service that would charge its customers, victims / subjects of online defamation, \$5,000.00 to remove a RIPOFF REPORT complaint or other defamatory content on the internet, and would accomplish this by injecting illicit source code (hacking) into RIPOFF REPORT's servers.
- He (DARREN MEADE) and ADAM ZUCKERMAN sold \$50,000 worth of [RIPOFF REPORT removals] in less than a week, maybe spending a total of only three hours on the phone. DARREN MEADE further testified that he and ADAM ZUCKERMAN did not need to advertise their services, because all they did was read the RIPOFF REPORT website and wait for somebody to publish something derogatory about a business and you would just turn around and call the business and say, "I see that you have this problem. We can make it go away for \$3,000." DARREN MEADE further testified that "THEIR largest client's were attorneys."
- DARREN MEADE further testified that "Ripoff Report never deletes anything written about somebody. So it's the perfect place to defame somebody because it will always stay up, and for some reason it winds up ranking on the first page of Google. So if you want to destroy somebody's reputation, that's a great place to do it."
- Michael Roberts was not aware that deploying the SQL code was illegal at the time Michael Roberts was attempting to purchase it.

A review of both DARREN MEADE's e-mail communications, disclosures he made to federal law enforcement officials from April 2011 through Nov 2011, as well as admissions he made in his above-mentioned deposition, leaves no doubt that as of the date he assumed the role as Progenex CEO, which was in June 2010, as well as throughout his

entire tenure there, DARREN MEADE knew ADAM ZUCKERMAN was using a number of aliases to conceal his criminal past. This proves DARREN MEADE was fully aware of the criminal scheme to steal Progenex funds and defraud its shareholders. In fact, in a November 15, 2011, e-mail, DARREN MEADE wrote that he “was the CEO of Progenex [and] knew what was being committed financially.”

On August 29, 2011, at KIRK MCMAHAN's sentencing hearing, while sitting alongside a victim of ADAM ZUCKERMAN's most recent fraudulent operation, XBANKER, DARREN MEADE told a sitting Federal District Court Judge that ADAM ZUCKERMAN and KIRK MCMAHAN threatened to explode DARREN MEADE's brain with a .50 caliber bullet if DARREN MEADE ever threatened to expose them.

On October 24, 2011, TRACEY RICHTER's murder trial started.

On October 25, 2011, in an email to Michael Roberts, DARREN MEADE thanked Michael Roberts for providing him updates on TRACEY RICHTER's murder trial and told Michael Roberts that he was praying for him.

On October 28, 2011, DARREN MEADE began making extortive demands of State's witness Michael Roberts for financial payments, which Michael Roberts refused. As a result of Michael Roberts' refusal to give DARREN MEADE money, DARREN MEADE's demands and threats towards Michael Roberts escalated.

In November 2011, flat broke and bereft of any employment, with his history of fraud having been exposed online, DARREN MEADE, desperate for a source of income, saw an opportunity to forge a relationship with ED MAGEDSON, the owner, operator, and “Editor” of Ripoffreport.com, by providing ED MAGEDSON with information about the ongoing report removal attacks that he (DARREN MEADE), ADAM ZUCKERMAN, MATTHEW COOKE, and his other co-conspirators had been executing with the SQL technology. However, DARREN MEADE (assumedly) failed to tell ED MAGEDSON / RIPOFF REPORT and the FBI that he actively and enthusiastically participated in this same scheme before he got booted out of the deal. In fact, DARREN MEADE would later admit that he (DARREN MEADE) removed derogatory RIPOFF REPORT complaints about himself (DARREN MEADE) by injecting this illegal source code into RIPOFF REPORT's servers. Furthermore, during his conversation with Paul Portelli on 23 Feb 2011, DARREN MEADE stated that the reason for his voluntary continued involvement with convicted felon ADAM ZUCKERMAN was to “make money off the [RIPOFF REPORT removals].”

On November 5, 2011, two days before TRACEY RICHTER was to be sentenced, DARREN MEADE launched his first reprisal against Michael Roberts when, in the comment section below an online news story about TRACEY RICHTER's case, he accused Michael

Roberts of being criminally responsible for Dustin Wehde's murder.

The next day, on November 6, 2011, the jury in TRACEY RICHTER's murder trial handed down their guilty verdict.

On November 10, 2011, TRACEY RICHTER's good friend DONNA BISTRICAN and DARREN MEADE had a phone conversation that lasted over one hour.

On November 22, 2011, ANNA RICHTER called DARREN MEADE (one minute).

On November 23, 2011, TRACEY RICHTER wrote the following in a letter to Jim Landa, a convicted child molester incarcerated in Wisconsin: "Recently a man came forward with claims my [second] husband, [Michael Roberts] threatened to kill him and befriended a mentally unstable man and got that man [sic] to break into his [sic] present home."

On November 27, DARREN MEADE called ANNA RICHTER and the two spoke for seven minutes.

On November 28, 2011, ANNA RICHTER and DARREN MEADE had a phone conversation that lasted over eighty-three (83) minutes.

On November 29, 2011, ANNA RICHTER and DARREN MEADE had a phone conversation that lasted about fifty (50) minutes.

On December 1, 2011, DARREN MEADE and RUSSELL SCHERTZ, TRACEY RICHTER's fiancé, spoke on the phone for eighty-seven (87) minutes.

Between December 12 and 15, 2011, DARREN MEADE visited Arizona and stayed in a hotel on the same road on which RIPOFF REPORT's attorneys are located.

In December 2012, DARREN MEADE began publishing harassing and defamatory stories on the internet about the State's witnesses, most of which he and others published as "complaints" on the purported consumer advocacy website www.ripoffreport.com (RIPOFF REPORT). Among many other things, these "complaints" accuse the State's witnesses of murder, child molestation, terrorism, perjury, and a myriad of financial crimes, including fraud.

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**RIPOFF REPORT**

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According to RIPOFF REPORT employee / agent SIAMACK YAGHOBI (aka SAM YOUNG), RIPOFF REPORT / XCENTRIC VENTURES is worth more than 35 million dollars.

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On December 10, 2011, DARREN MEADE wrote the following Facebook message to a friend: "I leave for Arizona on Monday to meet with the FBI and then for a job interview afterwards...looks like I might do an interview on Dateline NBC in 2-3 weeks to get the story out on all of this. The job interview is in [Arizona], but I would still work from Laguna."

Between December 12 and 15, 2011, DARREN MEADE visited Arizona and stayed in a hotel on the same road on which RIPOFF REPORT's attorneys are located.

On December 21, 2011, DARREN MEADE sent an e-mail, which contained the job proposal he pitched to ED MAGEDSON / RIPOFF REPORT.

In early January 2012, ED MAGEDSON and RIPOFF REPORT possessed and had

knowledge of DARREN MEADE's aforementioned deposition.

On or around January 1, 2012, DARREN MEADE told Dr. Scott Connelly he was hired by TRACEY RICHTER's mother, ANNA RICHTER, and brother to help TRACEY RICHTER get a new trial.

On January 1, 2012, TRACEY RICHTER told ANNA RICHTER to have BERT PITMAN see if he could get "[DR. JOHN PITMAN's former girlfriend, Allisan Tucker] to turn on Dr. John Pitman." TRACEY RICHTER added that [Allisan Tucker] is looking to further her career and if she [had] something on [Dr. John Pitman] that could be helpful, know what I mean?" TRACEY RICHTER told ANNA RICHTER that "it would be heaven" and would "serve [Dr. John Pitman] right" if he was betrayed by someone he put before his son (BERT PITMAN).

On January 3, 2012, ANNA RICHTER told TRACEY RICHTER that DARREN MEADE was "going after" Michael Roberts.

On January 20, 2012, TRACEY RICHTER told BERT PITMAN he "[needed] to work magic." TRACEY RICHTER told BERT PITMAN to talk to Dr. John Pitman's nurses to see if any of them had information that would prove Dr. John Pitman lied when he testified against TRACEY RICHTER. BERT PITMAN said he had talked to one of Dr. John Pitman's nurses and could get more information from that nurse. TRACEY RICHTER told BERT PITMAN to tell this nurse that the nurse would have the potential to save someone's life (TRACEY RICHTER's life). BERT PITMAN said this nurse wanted to talk, and another one of Dr. John Pitman's employees was tired of Dr. John Pitman. BERT PITMAN stated he would talk to people who work for Dr. John Pitman. BERT PITMAN told TRACEY RICHTER he did not know the situation with Dr. John Pitman's former girlfriend, Allisan Tucker, and whether she would tell BERT PITMAN anything. TRACEY RICHTER said she thought "[Allisan Tucker] would "f\*\*k Dr. John Pitman over in a heartbeat." BERT PITMAN said the last time he went out on a limb for TRACEY RICHTER, his father, Dr. John Pitman, cut him off, so he (BERT PITMAN) needed to be careful, and should hire a lawyer before he talked to Allisan Tucker, because it could backfire on him (BERT PITMAN). TRACEY RICHTER directed BERT PITMAN to get Allisan Tucker's contact information and give it to ANNA RICHTER, and ANNA RICHTER would contact Allisan Tucker so that BERT PITMAN's participation in the matter would not be known to Dr. John Pitman.

On January 26, 2012, Journalist Glenn Puit, published RIPOFF REPORT complaint No. article 829020, which is more or less a damning account of the criminal activities of convicted felons ADAM ZUCKERMAN and KIRK MCMAHAN described earlier herein.

On January 28 and 30, 2012, DARREN MEADE wrote the following to Dr. Scott Connelly and Dr. Scott Connelly's attorney: "It seems my deposition was sent to a third-party the

General Counsel for Ripoff Report. Do you have any idea how this happened?"; "I have not authorized ANY dissemination of the depositions"; "I need to ask for you to keep [your] promise...[that you] will not disseminate [DARREN MEADE's deposition to third parties without clearing it with [me, DARREN MEADE]"; and "going behind my back [and giving my deposition to] [RIPOFF REPORT] is bad faith; "I explained to you the FBI investigation [into the RIPOFF REPORT hacking to remove complaints for profit, of which DARREN MEADE was part] is in it's fragile state. That the boiler room information should funnel through me, instead you had [your attorney] reach out directly and he offers up my deposition [to RIPOFF REPORT]?"

On February 3, 2012, TRACEY RICHTER asked ANNA RICHTER whether there was anything else on RIPOFF REPORT and / or whether RIPOFF REPORT was going after Michael Roberts, "big time." ANNA RICHTER said RIPOFF REPORT was going after Michael Roberts, "big time." ANNA RICHTER said DARREN told her RIPOFF REPORT had Michael Roberts on the run and that Michael Roberts had to be going crazy. ANNA RICHTER said RIPOFF REPORT had not yet published her "complaint" on RIPOFF REPORT, even though she had submitted it to RIPOFF REPORT a number of days prior. TRACEY RICHTER directed her mother to check RIPOFF REPORT every single day.

On February 14, 2012, DARREN MEADE authored / published RIPOFF REPORT complaint No. 839253, the first version of "Google-Cide Exposed By The Man Who Knew Too Much, DARREN MEADE threatened and life in danger – SEO (Search Engine Optimization) Reputation Management dark side," which is an oft updated RIPOFF REPORT complaint deliberately crafted to deflect and obfuscate DARREN MEADE's knowledge of and enthusiastic participation in the criminal scheme leading to the executed SQL hack licensing agreement between ADAM ZUCKERMAN and MATTHEW COOKE. In this original report (and subsequent updates by DARREN MEADE himself) DARREN MEADE admitted his eye witness status but purposely omitted critical facts regarding the true nature of his volitional participation with ADAM ZUCKERMAN's plan from November 2010, continuously up to February 24, 2011, at which time DARREN MEADE became aware that ADAM ZUCKERMAN had usurped the SQL licensing opportunity for himself and was proceeding without DARREN MEADE. To further camouflage his culpability he even included facts concerning the involvement of Reputation.com in the bidding process for exclusive access to the license rights to MATTHEW COOKE's SQL code:

I was recruited as the CEO of another [ADAM ZUCKERMAN]-controlled entity, Progenex, from which he embezzled the funds to acquire both a controlling interest in REXXFIELD and the rights to the SQL injection code. In completely unrelated news, the hacker who wrote it MATTHEW COOKE was the brain behind RemoveYourName.com. That is, until he sold the domain (is that all?) to the well-meaning folks at Reputation.com. Draw your own

conclusions.

The underlined hyperlink (see below) included in the original (and subsequent updates) provided evidence of the statement by MATTHEW COOKE referring to an offer of \$60,000.00 put forth by Reputation Defender (name changed to Reputation.com in January 2011) for exclusive use rights to the criminal SQL code. <http://www.ripoffreport.com/features/audio/Matthew-Cooke-Call-With-Michael-Roberts.mp3>

Bank records recovered in the course of the Progenex embezzlement investigation confirmed that MATTHEW COOKE's online property RemoveYourName.com was acquired as an "asset purchase" by Reputation Defender (now Reputation.com) in December of 2010 less than 30 days after the execution of the Rexxfield-Cooke SQL license agreement (aka "Trade Secret Purchase agreement") was executed. Financial transactions and other records also indicate that during that same time frame (Oct-Dec 2010) MATTHEW COOKE was operating an "affiliate partner" network in which dozens of existing online reputation management companies were paying MATTHEW COOKE to remove clients' online complaint reports by using his SQL code on a fee-for-service basis. The evidence shows that by late 2010 MATTHEW COOKE had also created an online business model of "reputation racketeering" in which his online property RipOffRant.com, a website, which operated the same as RIPOFF REPORT, was used to create defamatory reports about individuals and businesses alike. Victims of online defamation would then be solicited via one of MATTHEW COOKE's (or one of his affiliate partner's) reputation management companies, proffering removal services.

This business model is identical to the organization disclosed by the investigation and prosecution by California State Attorney Kamala Harris of **REVENGE PORN** website operator KEVIN CHRISTOPHER BOLLAERT. Evidence disclosed to the public indicates KEVIN BOLLAERT was earning tens of thousands of dollars per month by simultaneously operating dual websites. One website posted nude pictures of female victims while the other (ChangeMyReputation.com) would solicit these same victims for the removal of the offending pictures. Many of the offending images were obtained by hacking the victims email accounts and cell phones.

[http://www.omaha.com/news/nation/alleged-revenge-porn-site-operator-heads-to-trial/article\\_0d36d51c-eb6d-5bb0-884d-2b69beaab109.html](http://www.omaha.com/news/nation/alleged-revenge-porn-site-operator-heads-to-trial/article_0d36d51c-eb6d-5bb0-884d-2b69beaab109.html)

DARREN MEADE also said the following in this RIPOFF REPORT complaint (No. 839253):

When I told [ADAM ZUCKERMAN] I would not be involved, I was offered a six-figure bribe and an equity stake in the venture. I chose option B, tendering my resignation. Shortly thereafter, I received an audio recording wherein [ADAM ZUCKERMAN] and Rexxfield operatives describe in great detail the effects a .50 caliber bullet will have on my

brain should I ever go public with this information. I suppose it's mildly amusing audio if you can ignore the fact that it's coming from someone with a history of criminal violence THIS IS A CALL FOR HELP. I am literally putting my life on the line to expose not just another Internet scam, but a threat against the very fabric of our society: The right to speak the truth and be heard. I only hope someone hears me before it's too late.

On February 21, 2012, ANNA RICHTER told TRACEY RICHTER that DARREN MEADE told her that Michael Roberts and his children left the United States using fraudulent passports. ANNA RICHTER stated TRACEY RICHTER and Michael Roberts' son, N.R., is still in the United States because Michael Roberts' wife, Dr. Heidi Roberts (aka Heidi Forsbacka) hated N.R. ANNA RICHTER stated she was going to give TRACEY RICHTER's fiancé, RUSSELL SCHERTZ, information about Michael Roberts and TRACEY RICHTER and Michael Roberts' children, N.R. and M.R.

On February 21, 2012, TRACEY RICHTER directed her mother to get orders from the U.S. State Department and Immigrations and Customs Enforcement (ICE) to get a "printout" of all Michael Roberts' wife's and children's flight activities and then get their credit information to track their spending to locate Michael Roberts. The two discussed filing kidnaping charges against Michael Roberts and his wife, Dr. Heidi Roberts. TRACEY RICHTER said they needed to obtain a court order to give to the Australian Consulate in Chicago, Illinois, and any other information that would allow them to find N.R., M.R., and Michael Roberts. TRACEY RICHTER said she believed Michael Roberts was fraudulently receiving welfare-type benefits for himself and their children from the Australian government and that they could get the Australian government to "go after" Michael Roberts. ANNA RICHTER said that JOHN RICHTER told her that he believed the same about Michael Roberts receiving welfare benefits. TRACEY RICHTER gave ANNA RICHTER a list of information they needed to obtain on / about N.R. and M.R. TRACEY RICHTER said they needed to get Michael Roberts' wife's travel records from ICE because Michael Roberts may have changed his name, but that Heidi Forsbacka (aka Dr. Heidi Roberts) may not have. ANNA RICHTER said DARREN MEADE also asked her to get information about Michael Roberts' wife, Dr. Heidi Forsbacka (aka Dr. Heidi Roberts). TRACEY RICHTER stated that ICE would not give this information without a court order. TRACEY RICHTER said they needed to obtain a court order directing Michael Roberts to return to the U.S. with the children within forty-eight hours, and if he had them in Australia, it would be impossible for him to comply with the Court's order, which would allow them to have an amber alert issued and have Michael Roberts held in contempt of court. ANNA RICHTER stated that Michael Roberts is scared because he knows he is going to be arrested and that Michael Roberts probably gave the children to his wife, Dr. Heidi Forsbacka (aka Dr. Heidi Roberts), believing he was going to be arrested. ANNA RICHTER said she recently sent an e-mail to TRACEY

RICHTER's fiancé, RUSSELL SCHERTZ, concerning the foregoing. TRACEY RICHTER said she make an affidavit that she did not give Michael Roberts permission to take the kids out of the country and, "if [she had] to," she would swear that Michael Roberts once threatened to take the children to Thailand. TRACEY RICHTER said they needed to put up a website about Michael Roberts's wife, Dr. Heidi Forsbacka (Dr. Heidi Roberts), M.R., and N.R., to help find the children. ANNA RICHTER said she would get DONNA BISTRICAN to help her create this website.

On February 23, 2012, TRACEY RICHTER gave her passwords to her two computers to ANNA RICHTER. TRACEY RICHTER indicated one of her computers was at her fiancé, RUSSELL SCHERTZ's home, and the other was in ANNA RICHTER's possession. TRACEY RICHTER told ANNA RICHTER to search the computer for files labeled "Passport" and "Michael Ross Roberts." TRACEY RICHTER indicated that the latter contained all of Michael Roberts' personal information ANNA RICHTER said she told RUSSELL SCHERTZ she would get him this information. TRACEY RICHTER said RUSSELL SCHERTZ had checked to see if her and Michael Roberts' children, N.R. and M.R, had passports by using their social security numbers and birthdates. ANNA RICHTER said JOHN RICHTER told her that Michael Roberts obtained fraudulent passports for their children TRACEY RICHTER said RUSSELL SCHERTZ and / or John Richter was / were in the process of getting more information from the U.S. State Department and that she wanted them to get the "guy from the State Department" on the phone. ANNA RICHTER said she believed a warrant for Michael Roberts' arrest should be issued immediately for "falsifying legal paperwork." TRACEY RICHTER said the guy at the U.S. State Department is ready to issue an arrest warrant for Michael Roberts. TRACEY RICHTER said RUSSELL SCHERTZ gave photographs of N.R. and M.R. to the "guy" at the U.S. State Department for comparison. TRACEY RICHTER said Michael Roberts could have changed their appearances.

On February 26, 2012, ANNA RICHTER asked TRACEY RICHTER whether RUSSELL SCHERTZ talked to TRACEY RICHTER about her children. ANNA RICHTER said JOHN RICHTER told her (ANNA RICHTER) that "people" who knew Michael Roberts believed he was still in the U.S., but that DARREN MEADE believed TRACEY RICHTER and Michael Roberts' daughter, M.R., was no longer in the U.S. ANNA RICHTER said JOHN RICHTER was going to obtain information concerning Michael Roberts' travels with his children, N.R. and M.R. ANNA RICHTER said someone authorized to access this information was going to give it to JOHN RICHTER. TRACEY RICHTER said it was clear Michael Roberts did not have his car registered in his name otherwise they would have found it. TRACEY RICHTER told ANNA RICHTER to have DARREN MEADE include in his affidavit that he heard through "the grapevine" that M.R. was not in the U.S. ANNA RICHTER said they

should soon learn whether M.R. was still in the U.S. because JOHN RICHTER was going to use his source to find out whether the kids had traveled. ANNA RICHTER said JOHN RICHTER can lawfully access certain government databases to see whether passports have issued for N.R. and M.R., and whether the children had left the U.S. ANNA RICHTER said JOHN RICHTER could lose his job if he did certain searches, but that the searches he would be conducting were legal. ANNA RICHTER stated that they have done these searches before on "someone" to see if that person has traveled out of the country.

On March 2, 2012, pursuant to a subpoena, SCA Smith provided an affidavit in Michael Roberts and TRACEY RICHTER's custody modification proceedings, which supported Michael Roberts. Later that day, John Richter sent an affidavit to RUSSELL SCHERTZ's place of business, ConAgra Foods in Omaha, Nebraska, and RUSSELL SCHERTZ forwarded the same to TRACEY RICHTER's attorney. In this his affidavit, JOHN RICHTER referenced a criminal complaint that alleged Michael Roberts had called him on October 29, 2011, and threatened to shoot and kill John Richter with a sniper rifle. Also in his affidavit, John Richter accused your applicant, SCA Smith, of committing a number of crimes, including obstructing his police department's investigation into the alleged death made by Michael Roberts.

Your applicant believes JOHN RICHTER fabricated this complaint against Michael Roberts to access information that would not otherwise be available to JOHN RICHTER absent a bona fide criminal investigation.

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LOCATING MICHAEL ROBERTS, N.R., AND M.R.

As discussed earlier, immediately following TRACEY RICHTER's arrest, Michael Roberts took custody of their children, N.R. and M.R., and moved to California where he was enrolled in the State of California's victim protection program. Save for a few monitored calls he allowed TRACEY RICHTER to have with their children, Michael Roberts did not allow her and her family to have any contact with his children, or know their current whereabouts.

On August 6, 2011, TRACEY RICHTER told ANNA RICHTER, that TRACEY RICHTER's son, N.R., who was three years old when TRACEY RICHTER murdered Dustin Wehde, "[remembered] some things about the attack" and, therefore, needed to be added as witness in her criminal case. TRACEY RICHTER told her mother that her criminal defense attorney was attempting to find a lawyer to get an order prohibiting Michael Roberts from

leaving the United States with N.R. and M.R.

On August 9, 2011, after TRACEY RICHTER's bond review hearing, TRACEY RICHTER's criminal defense attorney asked SCA Smith for Michael Roberts' address because they were trying to find TRACEY RICHTER's children. This attorney also told SCA Smith that they warned the U.S. State Department that Michael Roberts may be attempting to get U.S. passports for N.R. and M.R. so he could take them out of the United States.

On August 20, 2011, TRACEY RICHTER told ANNA RICHTER that they checked an address that they believed was Michael Roberts' primary residence. TRACEY RICHTER stated that her brother, John Richter, a police detective in another state, had talked on the phone with TRACEY RICHTER's criminal defense attorney(s) for three hours.

On August 25, 2011, TRACEY RICHTER's fiancé, RUSSELL SCHERTZ, told TRACEY RICHTER that he was thinking about filing kidnapping charges against Michael Roberts.

On August 26, 2011, RUSSELL SCHERTZ read TRACEY RICHTER the contents of an online article concerning Michael Roberts and DARREN MEADE. TRACEY RICHTER told RUSSELL SCHERTZ to contact the author of the article, who was / is believed to be DARREN MEADE, using a "disposable e-mail." RUSSELL SCHERTZ and TRACEY RICHTER discussed a list RUSSELL SCHERTZ had of past physical addresses for Michael Roberts, which TRACEY RICHTER had compiled over the years.

On August 28, 2011, TRACEY RICHTER told RUSSELL SCHERTZ he needed to find a way to have N.R. be made a witness in her murder case so that Michael Roberts would have to bring him back to the area.

On September 4, 2011, TRACEY RICHTER told ANNA RICHTER, that "this DARREN MEADE "[knew something about Michael Roberts]."

On September 7, 2011, TRACEY RICHTER's defense attorney's notified your applicant that they intended to call TRACEY RICHTER's son, N.R., as a witness in TRACEY RICHTER's murder trial.

On September 9, 2011, RUSSELL SCHERTZ told TRACEY RICHTER that they are trying to find Michael Roberts' IP addresses and other information in effort to locate him and his children. Later in this conversation, RUSSELL SCHERTZ and TRACEY RICHTER conspired to sneak a television producer into TRACEY RICHTER's criminal depositions as TRACEY RICHTER's "third attorney."

On October 4, 2011, one of TRACEY RICHTER's criminal defense attorney's asked SCA Smith for Michael Roberts' address so they could serve him with a subpoena to testify in TRACEY RICHTER's criminal case. SCA Smith told this criminal defense attorney that



"[p]ersonal service of any out-of-state subpoena for Michael Roberts can be made by serving [his Iowa attorney]...at the below address."

On September 16, 2011, TRACEY RICHTER received a document sent to her by ANNA RICHTER, which concerned Michael Roberts and DARREN MEADE's business association. ANNA RICHTER told TRACEY RICHTER she found the document on the internet. The document was a letter DARREN MEADE sent to the US DOJ on or around July 22, 2011, wherein DARREN MEADE told the US DOJ that Michael Roberts was ADAM ZUCKERMAN's victim.

On September 19, 2011, ANNA RICHTER told TRACEY RICHTER that her son, JOHN RICHTER, had given her documents concerning Michael Roberts. ANNA RICHTER said she planned to have JOHN RICHTER, a police detective in another state, look up personal information about Michael Roberts and his associates.

On October 24, 2011, TRACEY RICHTER's murder trial began.

On October 28, 2011, about a week before the jury convicted TRACEY RICHTER of first degree murder, JOHN RICHTER sent the following Facebook message to his nephew, TRACEY RICHTER and Michael Roberts' son, N.R.:

Me, [TRACEY RICHTER], [TRACEY RICHTER's sister], [ANNA RICHTER] and [RUSSELL SCHERTZ] luv [sic] you guys very much, you should be home soon. Tell [M.R.] I luv [sic] her to [sic]." JOHN RICHTER went on to ask N.R. "where [sic] you guys living now?"

On October 29, 2011, five days into TRACEY RICHTER's murder trial, JOHN RICHTER alleged Michael Roberts called him at his police precinct that day and threatened his life. The following is an excerpt from JOHN RICHTER's report concerning this alleged incident:

SAID VICTIM (DET. [JOHN RICHTER], #20768) WENT TO THE 002ND DIST. DESK TO REPORT A TELEPHONE THREAT WITH SAID OFFENDER (ROBERTS, MICHAEL). VICTIM RELATED THAT SAID OFFENDER CALLED HIS PLACE OF EMPLOYMENT [\*\*\*] AND STATED "YOU BETTER SHUT YOUR MOUTH ABOUT ME" WHEN THE VICTIM ASKED THE OFFENDER TO REPEAT HIMSELF, THE OFFENDER STATED "KEEP IT UP, AND KEEP IN MIND THAT I HAVE A VERY GOOD RIFLE SHOT." VICTIM THEN ASKED OFFENDER IF HE WAS THREATENING HIM AND OFFENDER THEN STARTED SCREAMING RELIGIOUS REFERENCE ABOUT REVENGE. THE PHONE CALL WAS THEN DISCONNECTED AFTER MID SENTENCE. VICTIM RELATED THAT HE HAS TAKEN SAID OFFENDER'S STATEMENT AS A DIRECT THREAT TO KILL HIM. THE VICTIM IMMEDIATELY NOTIFIED HIS [SUPERVISING SGT] [OF THE INCIDENT AND FURTHER INFORMED SGT. [SUPERVISING SGT] THAT SAID OFFENDER HAS A PREVIOUS DOM. BATTERY CONVICTION AND IS NOT AUTHORIZED TO BE IN POSSESSION OF ANY FIREARMS. [SUPERVISING SGT INFORMED] VICTIM TO

REPORT INCIDENT TO THE 002ND DIST. DESK. VICTIM GIVEN REPORT FOR INCIDENT AND ADVISED ON [WRIT]/ORDER OF PROTECTION PROCEDURES.

On November 7, 2011, TRACEY RICHTER was convicted of murder. TRACEY RICHTER's criminal defense attorneys neither subpoenaed Michael Roberts or called N.R. as witness.

To believe John Richter here, you have to believe that Michael Roberts, on the precipice of getting full custody of his children and finally being vindicated for any involvement in Dustin Wehde's murder, after not speaking to JOHN RICHTER in more than a decade, while in hiding, called JOHN RICHTER at his police precinct while JOHN RICHTER was on duty, made the same death threat (sniper rifle) he allegedly made to DARREN MEADE in 2010, (according to DARREN MEADE's second or third version of this supposed incident).

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On April 24, 2012, DARREN MEADE, in an e-mail to SCA Smith, knowingly provided false information to SCA Smith to help TRACEY RICHTER get a new criminal trial and aid her in her upcoming custody hearing. DARREN MEADE used the following e-mail address to communicate with SCA Smith: [dmeade@kairos-meade.com](mailto:dmeade@kairos-meade.com).

DARREN MEADE also told SCA Smith the following:

- He (DARREN MEADE) had information that TRACEY RICHTER's second ex-husband, Michael Roberts, was responsible for Dustin Wehde's murder and that he provided this information to law enforcement in Iowa in December 2010 and January 2011.
- Michael Roberts, not DARREN MEADE, partnered with ADAM ZUCKERMAN and his criminal organization. In support of this, DARREN MEADE provided links to his RIPOFF REPORT complaints about Michael Roberts.
- Michael Roberts had threatened to kill DARREN MEADE: "[Michael Roberts] let me know that he owns a sniper rifle [sic] that he uses .50 caliber bullets 'and that he is a very good shot.'"
- He (DARREN MEADE) was aware SCA Smith already provided testimony favorable to Michael Roberts in Michael Roberts and TRACEY RICHTER's custody proceedings in Buena Vista County, and, at the upcoming custody hearing, SCA Smith needed to change his testimony and support TRACEY

RICHTER'S bid to have custody of N.R. and M.R. transferred to TRACEY RICHTER's mother, ANNA RICHTER.

In the above-mentioned e-mail, DARREN MEADE provided SCA Smith with a link to DARREN MEADE's Dropbox account, which account was linked to dmeade@kairos-meade.com]. [kairos-meade is business entity solely owned and operated by DARREN MEADE. The web domain for kairos-meade.com is serviced by GoDaddy]

DARREN MEADE sent blind copies of his e-mails to SCA Smith to ANNA RICHTER (anna\_richter2003@yahoo.com) and TRACEY RICHTER's fiancé, RUSSELL SCHERTZ (rschertz@cox.net). Also on or around this same day (April 24, 2012), DARREN MEADE sent a barrage of like-e-mails to more than ten news media outlets, including the Des Moines Register.

DARREN MEADE's phone records, which were obtained by SCA Smith shortly after DARREN MEADE contacted SCA Smith on April 24, 2012, revealed extensive communications between DARREN MEADE and TRACEY RICHTER's friends and family.

On April 25, 2012, in a letter to Sac County Sheriff Ken McClure, RUSSELL SCHERTZ wrote, "a man from California called [Sheriff McClure's Office] at least three (3) times in early 2011 [sic] and left messages saying that he had information about [Michael Roberts] being involved in a murder plot..." but [Sheriff McClure] failed to follow up with this "man from California." Of course the "man from California" to whom RUSSELL SCHERTZ is referring is DARREN MEADE. Also in this letter, RUSSELL SCHERTZ alleged the law enforcement entities that investigated and prosecuted his fiancé, TRACEY RICHTER, were corrupt and / or incompetent, including the Douglas County Sheriff's Office (Omaha, Nebraska). Many of the same allegations and conspiracies alleged by RUSSELL SCHERTZ in this letter appeared later in DARREN MEADE's RIPOFF REPORT complaints concerning TRACEY RICHTER and the State's witnesses. RUSSELL SCHERTZ sent copies of this letter to over fifty people, including local and national media correspondents and U.S. Senators. What is most troubling about the allegations RUSSELL SCHERTZ made in this letter is that before his fiancé was convicted for murder, RUSSELL SCHERTZ and TRACEY RICHTER were using Michael Roberts' then-amicable relationship with DARREN MEADE against him (Michael Roberts) in their custody proceedings. Additionally, on August 6, 2011, RUSSELL SCHERTZ called DARREN MEADE "**CRAZY.**" On August 29, 2011, RUSSELL SCHERTZ told TRACEY RICHTER that DARREN MEADE was an "**UNSTABLE CHARACTER.**"

On April 26, 2012, ANNA RICHTER sent an e-mail from her account [anna\_richter2003@yahoo.com] to a local newspaper journalist, which asked the reporter to look at the RIPOFF REPORT story published by DARREN MEADE and added "[t]here is no

doubt in my mind that some of the [members of the jury who convicted her daughter, TRACEY RICHTER, of murder] read the paper and internet that weekend and [TRACEY RICHTER's second ex-husband] made sure they were filled with his lies.”

On May 16, 2012, pursuant to a subpoena, SCA Smith gave testimony favorable to Michael Roberts in TRACEY RICHTER and Michael Roberts' custody proceedings. Prior to the hearing, TRACEY RICHTER asked the Court to transfer custody of their children to their maternal grandmother, ANNA RICHTER. Among other things, SCA Smith testified he believed ANNA RICHTER and TRACEY RICHTER conspired and attempted to solicit fraudulent testimony from convicted child molester Jim Landa to get TRACEY RICHTER a new murder trial and that TRACEY RICHTER had sent Jim Landa a picture of children knowing he was a convicted child molester.

SCA Smith testified about the e-mails DARREN MEADE had sent him on April 24, 2012. SCA Smith testified DARREN MEADE's phone records proved he and ANNA RICHTER had been communicating and that other evidence obtained by law enforcement proved that Michael Roberts and DARREN MEADE had an amicable relationship up until around October 24, 2011, when Michael Roberts refused to give DARREN MEADE money. SCA Smith testified that he believed that TRACEY RICHTER and / or ANNA RICHTER had DARREN MEADE manufacture false evidence against Michael Roberts to use against him in the custody proceedings and to get TRACEY RICHTER a new murder trial, much the same way the two tried to with convicted child molester Jim Landa.

On May 17, 2012, DARREN MEADE sent the following in an e-mail to SCA Smith:

Being that I have no legal background, nor the ability to retain legal counsel, the testimony requested would be for the grand jury and the only way you would be willing to investigate the witness intimidation and alleged jury tampering [by Michael Roberts]? In regards to my outreach and phone calls to the tipline for the Dustin Wehde, I did not keep the telephone number. I left a voice mail and another time I believe I spoke to someone, it was a female. I did share my concerns about Michael Roberts. This would be to the best of my recollection December 2010 to January/February 2011. Mr. Smith, I am now terrified that it seems you have discussed my e-mails with Michael Roberts the person who has conspired to have me killed, attempted extortion and threatened me with arrest if I stepped forward with what I know. The appearance of the e-mails seems to indicate you spoke with Michael Roberts before even responding to myself. Forgive the accusation but it sincerely causes me hesitancy going forward for both an honest investigation and that my life may now be truly in danger.

On May 17, 2012, at 12:00 p.m. CST, SCA Smith told the following in an e-mail to DARREN MEADE: I can have a court reporter lined up for depositions anytime in the afternoon next week. Please tell me when you will be available (via Skype) to provide regarding the

matters issues you have raised in your previous emails to me.

On May 17, 2012, at 4:27 p.m., SCA Smith replied to DARREN MEADE:

Yes, this matter was discussed with Michael Roberts. Let's be clear, I do not care about Michael Roberts, his ability to hack or whatever matters or dealings you guys have that do not relate to the investigation of crimes occurring in Sac County or over which Sac County would otherwise have jurisdiction. I do not care about Rexxfield or whatever business matters or dealings you and Michael Roberts shared. My question regarding the document I attached in the previous email required a simple yes or no; they either are yours or they are not. So, I would appreciate an answer to that question.

Another matter that troubles me is your willingness to provide me, via email, all sorts of information and make very serious accusations about Michael Roberts; but yet you are unwilling to swear to the same under penalty of perjury. This causes me concern.

There are some issues that concern me greatly regarding statements you have made, the following just being a few: neither the Sac County Sheriff nor the Sac City Police Department have a "tipline." Further, there is no record of anyone calling either one of the two aforementioned law enforcement entities (at their regular phone lines) from 2008 forward with information even remotely similar to that which you stated you previously provided. The Iowa Division of Criminal Investigation (DCI) has also told me they have no record of the same. Can you see how this is troubling?

I know you have been in contact / had communication (via phone) with ANNA RICHTER. I also have a statement provided to me by a former associate of yours that indicates you told said associate that ANNA RICHTER had told you she (ANNA RICHTER) was working to get a new trial for her daughter, TRACEY RICHTER. Can you see how this is troubling? Even more troubling is the timing of your communications with me and your reference to the pending custodial matters in Buena Vista County. I also know that before you called my office on April 12, 2012, you called a television news organization out of Sioux City. Again, this concerns me. You stated you believe your life to be in danger, so I am assuming you have made law enforcement in your area aware of such. Please provide me with the names of all such law enforcement entities to which you have made aware of said danger and your point(s) of contact for the same [to which you have reported these threats]. If you have not yet made such a complaint, then I suggest you [hang up the phone], dial 911, and [immediately report this threat to law enforcement].

You have leveled some very serious charges. As you can see from the above, we do take these matters seriously and will continue to investigate them accordingly. Please provide me with answers to all the above questions and please provide me with a yes or no as to whether you are going to make yourself available for a grand jury investigation.

On May 17, 2012, 5:35 p.m. CDT, in response to SCA Smith's above-mentioned request, DARREN MEADE wrote SCA Smith the following: "In regards to your request I am

resubmitting my previous emails under the penalty of perjury. I trust this will do until we can get another agency to investigate matters since you refuse too [sic] and seem very hostile from your other email." Interestingly, your applicant is not the first law enforcement official who DARREN MEADE accused of being hostile after calling DARREN MEADE out on his lies. In his aforementioned declaration, which was filed in a federal court on November 21, 2011, DARREN MEADE stated that during a phone call he had with an FBI SA on September 8, 2011, "During the call [the FBI SA] was hostile and accusatory towards me. He called me a liar on facts that he clearly had wrong."

The e-mail referenced immediately above was the last communication SCA Smith has had with DARREN MEADE.

On June 2, 2012, BERT PITMAN told TRACEY RICHTER he planned to give the Virginia Gazette information about Dr. John Pitman and his association with strippers. TRACEY RICHTER told BERT PITMAN to reach out to Dr. John Pitman's ex-girlfriend, Allisan Tucker. TRACEY RICHTER told BERT PITMAN to talk to a former co-worker of Dr. John Pitman to get dirt on [Dr. John Pitman]. TRACEY RICHTER said Dr. John Pitman associates with strippers and hookers. BERT PITMAN said the person who told BERT PITMAN personal, confidential information about one of Dr. John Pitman's patients, which information could be used against Dr. John Pitman, no longer worked for Dr. John Pitman. TRACEY RICHTER instructed BERT PITMAN to "reach out" to this person. BERT PITMAN said he planned to do this.

On July 10, 2012, after learning Dr. Scott Connelly had produced DARREN MEADE's deposition pursuant to SCA Smith's investigatory subpoena, DARREN MEADE, in a series of e-mails, begged Dr. Scott Connelly to "pull back" the lawfully subpoenaed deposition from SCA Smith and advise SCA Smith that the deposition transcripts contained numerous inaccuracies. DARREN MEADE asked Dr. Scott Connelly why Dr. Scott Connelly again released DARREN MEADE's deposition with DARREN MEADE's prior approval or knowledge. Following his refusal to contact SCA Smith and "pull back" DARREN MEADE's deposition, Dr. Scott Connelly was defamed on RIPOFF REPORT by an anonymous author.

On June 17, 2012, TRACEY RICHTER told ANNA RICHTER they had the ability to get the IP addresses of the people who published "complaints" on RIPOFF REPORT. ANNA RICHTER told TRACEY RICHTER that she was certain the person who put the information on RIPOFF REPORT about Michael Roberts was one of TRACEY RICHTER's friends. TRACEY RICHTER said one of the persons responsible for publishing the RIPOFF REPORT "complaints" about Michael Roberts was the owner of RIPOFF REPORT. TRACEY RICHTER then told her mother to stop talking about this matter over the phone.

On June 29, 2012, DARREN MEADE called MATTHEW COOKE and the two spoke for close to ten minutes. This is the same MATTHEW COOKE who DARREN MEADE and ADAM ZUCKERMAN partnered with to monetize the aforementioned illicit SQL code by using it to remove RIPOFF REPORT complaints for profit (\$5,000 per complaint removed). This is the same MATTHEW COOKE who DARREN MEADE told ED MAGEDSON and the FBI was responsible for deploying the illicit SQL hack into RIPOFF REPORT's servers.

On August 18, 2012, ANNA RICHTER told TRACEY RICHTER that DARREN MEADE wanted information about Michael Roberts' business. ANNA RICHTER said DARREN MEADE asked her a number of questions. TRACEY RICHTER told ANNA RICHTER that DARREN MEADE needed to look up certain information about Michael Roberts. ANNA RICHTER asked TRACEY RICHTER a number of questions about Michael Roberts' business. ANNA RICHTER said these questions had come directly from DARREN MEADE. TRACEY RICHTER had ANNA RICHTER write some things down on a piece of paper to give to DARREN MEADE. ANNA RICHTER said DARREN MEADE told her that State's witness Raymond Friedman disgusted him. ANNA RICHTER said DARREN MEADE wanted to know where he could get a copy of the picture of Michael Roberts that TRACEY RICHTER published on the website deadbeatdad.org. ANNA RICHTER said DARREN MEADE said Michael Roberts looked crazy in that picture and DARREN MEADE planned to publish the picture in one of his upcoming RIPOFF REPORT complaints about State's witness Michael Roberts. ANNA RICHTER said DARREN MEADE had some really bad pictures of State's witness Mary Higgins that he also planned to publish on RIPOFF REPORT. ANNA RICHTER said DARREN MEADE told her that his publishing uncomplimentary pictures of the witnesses on RIPOFF REPORT was "childish and immature, but he [was] doing it anyway." ANNA RICHTER said DARREN MEADE said there was an unbelievable amount of lying and corruption involved in TRACEY RICHTER's criminal trial. TRACEY RICHTER directed ANNA RICHTER to have DARREN MEADE somehow obtain Michael Roberts' tax returns. ANNA RICHTER said she had already given DARREN MEADE a great deal of information about Michael Roberts. ANNA RICHTER said DARREN MEADE told her State's witnesses Michael Roberts and Raymond Friedman engaged in shady / crooked business practices around the time TRACEY RICHTER murdered Dustin Wehde.

On August 20, 2012, TRACEY RICHTER asked ANNA RICHTER whether RUSSELL SCHERTZ was able to find computer files related to Michael Roberts' business. TRACEY RICHTER asked which of her computers ANNA RICHTER had in her possession. ANNA RICHTER said she had the silver computer. ANNA RICHTER said she just spoke with DARREN MEADE over the phone for one and a half hours. ANNA RICHTER said DARREN MEADE was getting more information and had asked ANNA RICHTER some questions. ANNA RICHTER said she had to get answers to these questions from TRACEY RICHTER's

fiancé, RUSSELL SCHERTZ. ANNA RICHTER said she did not want to discuss these questions over the phone. TRACEY RICHTER asked ANNA RICHTER if she found the "master file" on TRACEY RICHTER's computer. ANNA RICHTER said RUSSELL SCHERTZ took those (computers or files) to his residence in Omaha, Nebraska, because RUSSELL SCHERTZ knew better than ANNA RICHTER about such things. ANNA RICHTER said DARREN MEADE wanted information / documents proving TRACEY RICHTER had her name legally changed from TRACEY RICHTER to SOPHIA CORRINA THERESA BARONIN VON RICHTERHAUSEN EDWARDS. ANNA RICHTER said she told DARREN MEADE that TRACEY RICHTER's name change was real because ANNA RICHTER helped TRACEY RICHTER get copies of the document used to obtain her legal name change.

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SOPHIE CORRINA TERESE BARONIN VON RICHTERHAUSEN EDWARDS

On March 11, 2009, Deputies of the Douglas County Sheriff's Office (DCSO) (Omaha, Nebraska) were dispatched to TRACEY RICHTER's apartment / residence in Omaha, Nebraska, to meet TRACEY RICHTER. When the DCSO Deputies arrived, TRACEY RICHTER identified herself as TRACEY RICHTER. TRACEY RICHTER reported that she believed her second ex-husband, Michael Roberts, had accessed the interior of her car and planted photographs of Dustin Wehde's dead body in effort to harass her. The DCSO later concluded Michael Roberts did not break into her car, and that TRACEY RICHTER made this false report in hopes to use it against Michael Roberts in some upcoming civil custody / child support proceeding.

On April 4, 2009, furious at the DCSO Detective who refused to believe her, TRACEY RICHTER sent the following message to Iowa Division of Criminal Investigation (DCI) Special Agent (SA) Trent Vileta:

One day [Michael Roberts] is going to hurt someone. When he does, I will have the joy of sitting back and saying 'I told you so.' At this point, even if it is me, it will be worth having his true character exposed. I just pray he never hurts our children. Wouldn't it be lovely if [Michael Roberts] hurt that asshole's (Douglas County Detective) kids? **Fantasizing about that kind of stuff is about the only thing that gets me through moments like these.**

Later that same day, TRACEY RICHTER sent another e-mail to DCI SA Vileta, which stated that this Douglas County Detective "had just made the list."

Fearing TRACEY RICHTER was planning to hurt this detective's children and frame



Michael Roberts for it, law enforcement began looking into TRACEY RICHTER's background.

On or around April 22, 2009, law enforcement learned that on February 19, 2008, TRACEY RICHTER went to the Iowa Drivers License Station in Spencer, Clay County, Iowa, for a name change on her Iowa Drivers License. The Iowa Department of Transportation (DOT) agent said TRACEY RICHTER signed an Iowa DOT form for a name change to SOPHIE CORRINA TERESE BARONIN VON RICHTERHAUSEN EDWARDS, and that TRACEY RICHTER provided the Iowa DOT with a copy of a court document filed in Buena Vista County District Court Case No. CDCD002755, a passport, and social security in the name "SOPHIE C. EDWARDS" as justification for the name change on her Iowa Drivers License.

Law enforcement next learned that on January 17, 2009, the U.S. State Department issued U.S. Passport No. #####0483 to SOPHIE EDWARDS. Law enforcement learned that TRACEY RICHTER provided a social security number for SOPHIE EDWARDS as well as an affidavit signed and notarized by her ex-sister-in-law, "LISA Roberts (Michael Roberts's sister)" in regards to TRACEY RICHTER's name change on her U.S. Passport to SOPHIE EDWARDS. The U.S. State Department advised that SOPHIE EDWARDS' last entry of travel was February 2009, U.S. Passport #####0483, and that her destination of travel was Los Cabos, Mexico.

On April 17, 2009, law enforcement telephoned LEISA Devine (NOT LISA as the name was spelled on TRACEY RICHTER's / Sophie Edwards' U.S. Passport change of name form) (formerly Leisa Roberts) to determine whether or not she filed an affidavit in regards to TRACEY RICHTER changing the name of her U.S. Passport to SOPHIE EDWARDS. Previously, Michael ROBERTS informed law enforcement he had one sister, Leisa, who would be TRACEY RICHTER's ex-sister-in-law. Michael Roberts stated that Leisa Devine last visited the United States around 1999. Law enforcement learned that the U.S. Passport Affidavit Regarding Change of Name, purportedly signed by "LISA Roberts," was executed at Boys Town, Omaha, Nebraska, was reviewed and signed by a State of Nebraska Notary on January 17, 2009. The address provided by "Lisa Roberts" was 1851 N. 115<sup>th</sup> Plaza No. 3108, which was identified by law enforcement as being TRACEY RICHTER's residence at the time. Leisa Devine told law enforcement she last traveled to the United States in September 2000, for a three-week visit. Leisa Devine told law enforcement that she never signed and swore to an official document or affidavit on behalf of TRACEY RICHTER regarding a name change or for any reason. Therefore, she said that she never signed off on an affidavit regarding a name change of TRACEY RICHTER to SOPHIE EDWARDS. Leisa Devine told law enforcement she did not get along well with TRACEY RICHTER. Leisa Devine said that around 2003, TRACEY RICHTER and TRACEY RICHTER's mother,

ANNA RICHTER, attempted to reach Leisa Devine at her place of employment via e-mail. Since TRACEY RICHTER and her mother, ANNA RICHTER, were not speaking fondly of her brother, Michael Roberts, she said that she requested her place of employment to block all future incoming e-mails from TRACEY RICHTER and TRACEY RICHTER's mother, ANNA RICHTER.

On April 21, 2009, in a custody proceeding in Buena Vista County, Iowa, District Court Case No. CDCD002755, when cross-examined by her ex-husband, Michael Roberts, TRACEY RICHTER testified she had legally changed her name to SOPHIE EDWARDS, but she did not know whether or not her "legal" name change included a middle name. TRACEY RICHTER further testified she only used her new name, SOPHIE EDWARDS, for employment purposes, and that her vehicle was still registered in the name TRACEY RICHTER. When RICHTER was questioned as to whether or not she obtained a passport in her new name (SOPHIE EDWARDS), she responded, "No. I think my passport is still in my old name." When she was asked if she planned on getting a passport in her new name, RICHTER testified, "No." TRACEY RICHTER testified that her name change to SOPHIE EDWARDS was completed by filing an affidavit of name change, then providing the affidavit to the Iowa Department of Motor Vehicles to obtain a drivers license in her new name, SOPHIE EDWARDS. TRACEY RICHTER testified she did not file a petition for change of name in the State of Iowa with the Clerk of Court. She also admitted to the court in this proceeding that she did not have a Nebraska license, although she currently resided in Nebraska; instead, she admitted she currently had a valid Iowa driver's license utilizing the name SOPHIE EDWARDS.

On May 7, 2009, law enforcement was told by the Social Security Administration (SSA) that on December 3, 2009, TRACEY RICHTER requested a name change of her social security card to the new name, SOPHIE C. EDWARDS, and that TRACEY RICHTER submitted a divorce decree filed in Buena Vista County District Court Case No. CDCD002755 and Iowa Drivers License No. #####3673 in the name of SOPHIE EDWARDS in order to obtain / justify a name change on her social security card.

On May 9, 2009, law enforcement learned that on or around November 21, 2008, for the purpose of obtaining financing for an automobile under the name SOPHIE EDWARDS, TRACEY RICHTER gave Lexus of Omaha a copy of what TRACEY RICHTER told Lexus of Omaha was a court order filed December 4, 2007, in Buena Vista County District Court Case No. CDCD002755, which, among other things, gave her the choice to **RESUME** using her **MAIDEN NAME**, SOPHIE CORRINA TERESE BARONIN VON RICHTERHAUSEN EDWARDS. The following is the decretal language contained in the court order TRACEY RICHTER provided Lexus of Omaha:

IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED as follows: (1) No further conciliation procedures shall be required in this action. (2) The marriage of Michael Ross Roberts and TRACEY RICHTER Roberts is hereby, dissolved, and the parties are restored to the same rights and privileges as unmarried persons. (3) The Respondent, TRACEY RICHTER Roberts (15 May 1966) may resume use of her maiden name SOPHIE CORRINA TERESE BARONIN VON RICHTERHAUSEN EDWARDS. (4) The Respondent is granted authority to obtain U.S. Passports for the minor children, [full name of minor child boy] (26 May 1998) and [full name of minor child girl] (13 FEB 2000) without the permission of the non-U.S. Citizen Petitioner who resides at an undisclosed address. (5) The Court retains jurisdiction to enter Findings of Fact, Conclusions of Law and Decree pertaining to all other issues in this case.

On May 9, 2009, the Buena Vista County Clerk of District Court faxed law enforcement a certified copy of the only order entered in Case No. CDCD002755 on December 4, 2007. Said order was identical in all respects to the court order TRACEY RICHTER gave Lexus of Omaha, except the certified copy contained only the first, second, and fifth numbered paragraphs, numbered (1) (2), and (3), respectively, that were present in the copy of the decree TRACEY RICHTER gave Lexus of Omaha. The following is the how the decretal language contained in the certified copy of the Order appears:

IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED as follows: (1) No further conciliation procedures shall be required in this action. (2) The marriage of Michael Ross Roberts and TRACEY RICHTER Roberts is hereby, dissolved, and the parties are restored to the same rights and privileges as unmarried persons. (3) The Court retains jurisdiction to enter Findings of Fact, Conclusions of Law and Decree pertaining to all other issues in this case.

On May 13, 2009, the Douglas County (Omaha, Nebraska) Sheriff's Office executed a search warrant at TRACEY RICHTER's apartment in Omaha, Nebraska. During the course of their search, **inside a padlocked closet in TRACEY RICHTER's apartment**, law enforcement found, among other things, the following items: a copy of the December 4, 2007, court order that was identical to the certified copy of the same sent to law enforcement by the Clerk of Court; a copy of the December 4, 2007, court order which was identical to that provided by Lexus of Omaha, which as noted above, contained two additional numbered paragraphs, which allowed TRACEY RICHTER to obtain passports for her children without their father's permission and resume using her maiden name, SOPHIE CORRINA TERESE BARONIN VON RICHTERHAUSEN EDWARDS; **and a hybrid copy of the original order and a piece of paper containing the two additional paragraphs, cut, copied, and held together with Scotch Tape.**

Also found in TRACEY RICHTER's apartment was an unfiled, unsigned, yet completed Petition for Name change in the District Court of Douglas County, Nebraska, which, if filed

with, and approved by the Court, would have legally changed TRACEY RICHTER's name to [REDACTED] which was / is the name of Michael Roberts' wife.

TRACEY RICHTER, her mother, ANNA RICHTER, and her fiancé, RUSSELL SCHERTZ, have accused law enforcement of planting the forged court decree, its scotched-taped precursor, and the certified copy of the original in the **PADLOCKED** closet in TRACEY RICHTER's Omaha apartment when they executed the search warrant. However, this does not explain why on July 27, 2010, in her felony perjury trial in Clay County, Iowa (Case No. FECR014399), TRACEY RICHTER stipulated on the record that these very same documents were found by law enforcement during its search of her apartment pursuant to the search warrant issued / executed on or about April 29, 2009. Furthermore, no one in TRACEY RICHTER's camp can provide a reasonable explanation as to why SOPHIE EDWARDS listed TRACEY RICHTER as a reference in a job application she submitted to a prospective employer on January 20, 2009.

On May 18, 2009, TRACEY RICHTER wrote the following in another e-mail to DCI SA Vileta:

Yes, they charged me with felony criminal impersonation. In their complaint they state that I bought the used Lexus under an assumed name, when in fact all the financing was in [the name TRACEY RICHTER]. I think this is all about the complaints I made against [the Douglas County Sheriff's Office Detectives]. They talked about me forging a [document] to take the kids out of the country which is BS. I have [been] resisting them getting passports as late as this year. [Michael Roberts] took them to get passport photos whereas I filed passport alerts with both the Australian consulate and the US State Department. My philosophy was: no passport, no overseas travel in regard to our kids. Supposedly they found something in my house to support this passport claim. I would not put it past them trying to set me up. It should be easy enough to disprove.

On May 27, 2009, **TRACEY RICHTER was charged in Clay County, Iowa, with felony perjury** for falsifying the DOT form. On July 27, 2010, she was convicted by a jury for the same crime. State v. Richter, Clay County District Court Case No. FECR014399

On June 9, 2009, **TRACEY RICHTER was charged in Douglas County with criminal impersonation.** On April 19, 2010, she pleaded no contest to felony welfare fraud. State v. Richter, Douglas County (Omaha, Nebraska) District Court Case No. CR 09 1318.

After learning that law enforcement obtained the transcript of her testimony from April 21, 2009, **TRACEY RICHTER, made form of threat to the court reporter who reported the proceedings,** alleging the court reporter incorrectly reported the proceedings (assumedly, the part of her testimony where she lied about her SOPHIE EDWARDS passport). **This threat caused the authorities in Buena Vista County to post flyers containing TRACEY**

**RICHTER's Drivers License photograph and the following warning at the Courthouse's entrances:**

This photo is of [TRACEY RICHTER]. She has been arrested and released from Omaha, [Nebraska]. Due to the criminal charges that were filed against her in [Nebraska], she is extremely angry and upset not only with the authorities [in Nebraska] but also here in Buena Vista County. [TRACEY RICHTER] has made threats to an employee in the Clerk's Office as well as [the presiding Judge's] court reporter (who reported the proceedings, and generated a transcript of the same). All offices in the courthouse have been advised to watch for her, and if she enters the courthouse, they are to call immediately for law enforcement. **[TRACEY RICHTER] is not banned from entering the courthouse at this time, however, law enforcement presence will be required anytime she is in the courthouse.**

On October 22, 2009, in her Response to Petitioner's Motion for Rule to Show Cause filed in Buena Vista County District Court No. CDCD002755, TRACEY RICHTER stated her name change was "done in an EU country where 'middle names' are not utilized" and that she did not select a middle name. TRACEY RICHTER further told the Court she did not have a passport issued under the name of SOPHIE EDWARDS and that her new Social Security number was issued to TRACEY RICHTER, not SOPHIE EDWARDS. TRACEY RICHTER also told the Court that she did not travel in February 2009.

In June 2010, ANNA RICHTER wrote the following in a letter to then-Sac County Attorney Earl Hardisty:

After all of these crimes the only person being prosecuted is Tracey and she is the only one who has done nothing illegal. I am not going away until people are held accountable for their actions and that is including [the Douglas County Detective who investigated TRACEY RICHTER].

They tried to bring charges against her for using a fake name until it was proven she had a LEGAL name change. They supposedly found an altered court document in the search of Tracey's home. This document had her name change on it and permission to get the children passports. Needless to say [the Douglas County Detective who investigated TRACEY RICHTER] is the one who found it after another officer looked through that SAME FOLDER and didn't find it. First, why would she change a court document regarding her name when it was already changed legally?

This is just one of many letter's I am sending out. I will not stop until Tracey's name is cleared and ALL charges are dropped and [Michael Roberts] and [the Douglas County Detective who investigated TRACEY RICHTER] are held responsible for their actions. I know first hand how corrupt the Douglas County Sheriff s Dept. is by what they have done to me.

On July 28, 2010, ANNA RICHTER wrote the following in a letter to then-Sac County Attorney Earl Hardisty:

I was with her when she went for her new Driver's license and I know for a fact it was not used. Also how could Tracey have committed perjury when the supervisor filled out the part of the form that Tracey left blank, after Tracey signed it????? You can tell it is a different handwriting and also they should have had Tracey initial it if there were changes made to it. Don't you agree? This whole thing is fishy to me and you would have to be awful naive or stupid not see what is going on. I also find it interesting that all of your so called witnesses [in the Dustin Wehde murder, then-suspicious death case] are proven to be nut cases.

Following her arrest for murder, law enforcement seized, among many, many other things, two different name change documents TRACEY RICHTER had in a bag in her vehicle.

The first document is titled: "Deed of Change of Name," which purports to be executed on the "4<sup>th</sup> day of July 2006 ("July" and the number "4" are handwritten), and reads as follows:

By SOPHIE CORRINA TERESE BARONIN VON RICHTERHAUSEN EDWARDS of 56, Gloucester Road, London in the County of Greater London now or lately known as Tracey Anne RICHTER a Commonwealth Citizen under section 37(1) of the British Nationality Act 1981, witnesses and it is hereby declared as follows: I absolutely and entirely renounce, relinquish and abandon the use of my said former name Tracey Anne Richter and assume, adopt and determine to take and use from the date hereof the name of SOPHIE CORRINA TERESE BARONIN VON RICHTERHAUSEN EDWARDS in substitution for my former name of Tracey Anne Richter.

TRACEY RICHTER's (and SOPHIE EDWARDS') signatures on the purported "Deed of Change of Name" document mentioned above, is witnessed by TRACEY RICHTER's son, BERT PITMAN. The content of the second document is identical to the first, except its titled "UK Deed Poll Service, Deed of Change of Name (Deed Poll)" and purports to be executed "this 2<sup>nd</sup> day of February in the year 2008 "2<sup>nd</sup>" ("February" and "2008" are handwritten. TRACEY RICHTER's (and SOPHIE EDWARDS') signatures on this document were also witnessed by BERT PITMAN.

Sometime after she was arrested for murder, Scotland Yard (Metropolitan Police Headquarters in London, England) confirmed with law enforcement officials in Iowa that neither TRACEY RICHTER nor SOPHIE CORRINA TERESE BARONIN VON RICHTERHAUSEN EDWARDS were British / UK citizens.

On August 15, 2011, in her response to the State's resistance to Defendant's Motion to Reduce Bond, TRACEY RICHTER (aka SOPHIE CORRINA TERESE BARONIN VON RICHTERHAUSEN EDWARDS) admitted she did receive a new passport under the name of SOPHIE EDWARDS and did travel internationally using the same.

On September 12, 2011, less than one month after she was arrested for first degree murder, and a little over a year after she had been convicted of felony fraud in Nebraska

and felony perjury in Iowa, the U.S. Department of State filed a criminal complaint against TRACEY RICHTER for felony passport fraud (18 U.S.C. § 1542). Case No. 8:11MJ195 United States District Court for the District of Nebraska. This complaint was dismissed following her murder conviction and subsequent life sentence.

As mentioned above, on or around September 9, 2012, DARREN MEADE published TRACEY RICHTER's second change of name document mentioned above, on RIPOFF REPORT; however, he conveniently cropped out the top quarter of the document where one usually finds some official government stamp, seal, or other marking that verifies a government form / legal document's authenticity.

ANNA RICHTER has been vouching for the legality of TRACEY RICHTER's name change and has alleged to have witnessed TRACEY RICHTER NOT using / producing certain documents to facilitate this name change. As mentioned above, ANNA RICHTER was with TRACEY RICHTER when she went to the Iowa Department of Transportation (DOT) and witnessed her NOT produce the forged decree. ANNA RICHTER also was with TRACEY RICHTER when she went to buy the Lexus under the name SOPHIE EDWARDS and ANNA RICHTER witnessed her NOT produce the forged decree to the dealership to obtain credit in under the name SOPHIE EDWARDS.

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On August 25, 2012, TRACEY RICHTER told ANNA RICHTER that RUSSELL SCHERTZ was late getting to the prison to visit her because he had been giving documents to DARREN MEADE. TRACEY RICHTER told ANNA RICHTER that RUSSELL SCHERTZ had previously stated he planned to send documents to DARREN MEADE.

On August 29, 2012, ANNA RICHTER told TRACEY RICHTER she had been on the internet looking at information RUSSELL SCHERTZ sent her. TRACEY RICHTER asked whether RUSSELL SCHERTZ had found or sent "anything of any value. ANNA RICHTER said RUSSELL SCHERTZ had sent the information to "you know who," and "you know who" would be going through this information. ANNA RICHTER said there are other things that should be "coming out" shortly. ANNA RICHTER said "what's his name" wanted to know if Michael Roberts was ever deposed or interviewed. TRACEY RICHTER said RUSSELL SCHERTZ had a copy of Michael Roberts's interview on a disk.

On September 5, 2012, DARREN MEADE (dmeade@kairos-meade.com) wrote the following to his friend SIAMACK YAGHOBİ (siamack.yaghobi@gmail.com):

The 'Tracey Story' is the article I have written, read the narrative and when it gets to the links of the Dateline episode, watch them in sequence. I have documents and reports which will also be embedded in the article. The flow charts I asked if you can help me with, will be apart of the article. In the ["players"] document, you will see one section that [is] the Michael & Tracey outline, that is what needs to be detailed and also a flow chart on the jury tampering itself. We can work at my house, but it would be a few hours [until] we can, I had some early meetings, and need to sleep more [than] pray. What is your schedule like later today? Let me know as well if you [are able to] follow the article.

Included in this e-mail, DARREN MEADE attached two MS Word documents. One of these documents is DARREN MEADE's RIPOFF REPORT complaint No. 938843 (as it appears on RIPOFF REPORT, but in MS Word format) mentioned and discussed at great lengths throughout the remainder of this affidavit) The other attached MS Word document contained DARREN MEADE's notes on all the State's witnesses and law enforcement officials titled "The Players."

On September 6, 2012, in his response to DARREN MEADE's e-mail above, SIAMACK YAGHOBI gave DARREN MEADE suggested additions to what ultimately would become DARREN MEADE's RIPOFF REPORT complaint No. 938843. Most damning in SIAMACK YAGHOBI's response, however, is SIAMACK YAGHOBI told DARREN MEADE that he (SIAMACK YAGHOBI) planned to "**FILE A REBUTTAL**" on the article that would attack Michael Roberts. The significance of SIAMACK YAGHOBI's statement to DARREN MEADE here cannot be understated, as it and other information discussed in this affidavit demonstrates that ED MAGEDSON / RIPOFF REPORT and DARREN MEADE know the anonymous authors publishing add-on complaints and rebuttals to DARREN MEADE's RIPOFF REPORT complaints, including RIPOFF REPORT complaint No. 938843.

On September 7, 2012, TRACEY RICHTER asked ANNA RICHTER whether she got the information she needed from RUSSELL SCHERTZ. TRACEY RICHTER asked whether RUSSELL SCHERTZ put a copy of this information on ANNA RICHTER's computer. ANNA RICHTER said, "supposedly tomorrow or Saturday, all the other stuff is going to be taken care of." [In context, this was an obvious reference to DARREN MEADE's forthcoming RIPOFF REPORT complaint No. 938843) about the State's witnesses]

On September 9, 2012, DARREN MEADE published RIPOFF REPORT complaint No. 938843, which purports to be the results of his investigation into the corruption surrounding TRACEY RICHTER's criminal prosecution and conviction, but which is nothing more than DARREN MEADE's and ED MAGEDSON's / RIPOFF REPORT's efforts to harass and defame the State's witnesses in retaliation for their testimony against TRACEY RICHTER. Although DARREN MEADE published the complaint on September 9, 2012 (Sunday), it did not appear on RIPOFF REPORT until September 11, 2012 (Tuesday). RIPOFF REPORT



complaint No. 938843 and its progeny (e.g., add-on complaints, rebuttals, and hyperlinks to other derogatory RIPOFF REPORT complaints about the State's witnesses), among many other things, falsely accuses the State's witnesses and their family members of committing murder, theft, perjury, child molestation, and having sexually transmitted diseases. RIPOFF REPORT / ED MAGEDSON and DARREN MEADE published RIPOFF REPORT complaint No. 938843 as a "featured" RIPOFF REPORT complaint, which is advertised conspicuously on each of RIPOFF REPORT's approximate 1.8 million complaint pages. By ED MAGEDSON's and DARREN MEADE's own admissions that [www.ripoffreport.com](http://www.ripoffreport.com) is viewed "a couple million times a day," since complaint No. 938843 was published and featured (September 9, 2012), it has been viewed over 1.2 BILLION times.

On September 11, 2012, DARREN MEADE sent the following e-mail to ANNA RICHTER, , DONNA BISTRICAN, RUSSELL SCHERTZ, and JOHN RICHTER:

Anna and Russ, Thank you for being patient and [sic] during my investigation, [sic] I know it took longer than expected. **If you can promote the article and ask people to offer their honest opinion, not to compliment me, but to share their own stories of Ben Smith, Mary Higgins, Michael Roberts, Vileta, etc.** <http://www.ripoffreport.com/ben-smith-michael-roberts-rexxfield/prosecutorial-misconduct/sac-city-sac-county-iowa-B1A77.htm>

On September 11, 2012, DARREN MEADE ([dmeade@kairos-meade.com](mailto:dmeade@kairos-meade.com)) wrote the following in an e-mail to a SIAMACK YAGHOBI ([siamack.yaghobi@gmail.com](mailto:siamack.yaghobi@gmail.com)): "Here is the link to the article it posted tonight. This will give you an idea of layout for RIPOFF REPORT." <http://www.ripoffreport.com/ben-smith-michael-roberts-rexxfield/prosecutorial-misconduct/sac-city-sac-county-iowa-B1A77.htm>

On September 12, 2012, DARREN MEADE told private investigator Tina Church, who has assisted with this investigation, that ED MAGEDSON was the one who suggested to DARREN MEADE that DARREN MEADE should research / investigate TRACEY RICHTER's case. DARREN MEADE told private investigator Tina Church that ED MAGEDSON said he (ED MAGEDSON) would "promote" DARREN MEADE's work on the case and "get a couple million visitors per day on the site." In discussing his efforts to help TRACEY RICHTER obtain a new trial, DARREN MEADE told the investigator the following:

The three main witnesses in her trial gave completely different testimony than any of their depositions, including one month before the trial where they say what they are going to testify to and to let Ben Smith know if they are going to testify to anything different, and they all completely testified the opposite of what they said they were going to do.

On September 13, 2012, ANNA RICHTER said DARREN MEADE found more information and planned to publish it on RIPOFF REPORT at a later date.

On September 13, 2012, DARREN MEADE told private investigator Tina Church that he

might be able to get Michael Roberts to leave the U.S. if Michael Roberts believed he was about to be arrested.

On September 14, 2012, in a three-way phone conversation between ED MAGEDSON, DARREN MEADE, and private investigator Tina Church, ED MAGEDSON said the following:

I do not have people writing for me "per se," but if [the investigator] wanted to publish articles / complaints on RIPOFF REPORT and wanted to make them searchable...**AND IF YOU WANT TO GO TO THE TOP OF THE SEARCH ENGINE**, all you need to do is name the city, put the name of the attorney, you know, where you want it to be found by the clerk of the court, whatever you put up [on RIPOFF REPORT] within 20 minutes to an hour or so it would be at the top of Google.

ED MAGEDSON then told private investigator Tina Church to "search Ben Smith, Sac County Prosecutor (the title to DARREN MEADE's RIPOFF REPORT complaint No. 938843), see what you get." DARREN MEADE told private investigator Tina Church that ED MAGEDSON and ED MAGEDSON's attorneys had discussed that SCA Smith was not acting in the capacity of his official duties, but was acting more like Michael Roberts' personal attorney. Then, ED MAGEDSON interjected stating "that would be a good title, Prosecutor – you know, Ben Smith, Sac County Prosecutor...acts as [Michael Roberts] personal attorney." DARREN MEADE then told the investigator "the thing about [ED MAGEDSON] is if you ever need a title [for a RIPOFF REPORT complaint], he is the one to ask." Towards the end of the conversation, ED MAGEDSON told DARREN MEADE to link one of DARREN MEADE's other RIPOFF REPORT "complaints" about Michael Roberts to DARREN MEADE's September 9, 2012, RIPOFF REPORT complaint (complaint No. 938843)

On September 14, 2012, ANNA RICHTER told private investigator Tina Church the following:

[DARREN MEADE] got ahold of [DONNA BISTRICAN] and put something on the Internet. That's a friend of my daughter's. And had put something on the Internet, and I guess [DARREN MEADE] read it and he contacted her and then asked if he could talk to me, so she said, well, I don't want to give you her phone number, let me call her first and see if it's okay. That's when [DARREN MEADE] contacted me and said he believed in her innocence because too many things just were not adding up. And that he was going to help me to prove her innocence, and I was flabbergasted, because here is this man, doesn't know us at all and is there wanting to help us.

On September 15, 2012, ANNA RICHTER told TRACEY RICHTER about DARREN MEADE's September 11, 2012, RIPOFF REPORT complaint No. 938843; specifically, ANNA RICHTER said there was new information on RIPOFF REPORT about State's

witnesses Raymond Friedman, Mary Higgins, and Mona Wehde. ANNA RICHTER also said DARREN MEADE planned to publish more information on RIPOFF REPORT concerning the State's witnesses at a later date. ANNA RICHTER further said the "big connection was money, and that State's witnesses Raymond Friedman and Michael Roberts were each other's alibi." ANNA RICHTER told TRACEY RICHTER that the pictures of State's witness Mary Higgins published on RIPOFF REPORT by DARREN MEADE were hysterical. ANNA RICHTER said DARREN MEADE discovered evidence of Michael Roberts having a sexual relationship with Dustin Wehde, TRACEY RICHTER's murder victim. TRACEY RICHTER said she was glad someone was putting the truth out there. TRACEY RICHTER said DONNA BISTRICAN would help ANNA RICHTER create a Facebook page. TRACEY RICHTER told ANNA RICHTER to have BERT PITMAN send State's witness (murder victim's sister) Ashley Wehde a Facebook message with a link to DARREN MEADE's RIPOFF REPORT complaint No. 938843. ANNA RICHTER said DARREN MEADE published a short story about State's witness (and murder victim's mother) Mona Wehde in this RIPOFF REPORT. The RIPOFF REPORT complaint or story to which ANNA RICHTER is referring alleges that Mona Wehde was also criminally responsible for her son's (Dustin Wehde) death.

On September 16, 2012, DARREN MEADE told private investigator Tina Church that he was publishing an update on RIPOFF REPORT about State's witness Raymond Friedman. DARREN MEADE also told private investigator Tina Church the following:

So what this really is the -- you have -- besides [State's witness Mary Higgins's] testimony, you have two other people's testimony who tied in the prosecution's time line on why [TRACEY RICHTER] murdered [Dustin Wehde], and those two people are [State's witnesses Marie Friedman and Ray Friedman]. Now, [State's witness Raymond Friedman and Marie Friedman] were interviewed the day after the shooting, and their interviews are the exact opposite of what they testified to in court. But what happened in between that [time] is [State's witness Raymond Friedman] was paid \$25,000 [by State's witness Michael Roberts]

When private investigator Tina Church asked DARREN MEADE about DARREN MEADE's aforementioned deposition, which apparently had been published somewhere on the internet, possibly on RIPOFF REPORT, DARREN MEADE said the following:

[Michael Roberts]...published these fake transcripts from a deposition I gave. And I have never defended those, but I haven't defended them because I want them all over the Internet where they can't go and take that stuff down. I want them baked into their position.

When private investigator Tina Church asked DARREN MEADE whether the depositions were fake, DARREN MEADE said the following:

Not totally fake. What it is...they changed portions of my answers in there. They also don't

have the corrects to the deposition that I gave. So they are miss -- they are altered transcripts. They also don't contain the corrections that are supposed to be in there.

Later in their conversation, DARREN MEADE told private investigator Tina Church the following:

The [September 9, 2012, RIPOFF REPORT complaint about the State's witnesses (No. 938843)], **I LAID THAT ALL OUT. NOW, I DID BECAUSE [ED MAGEDSON] OFFERED IT TO ME, YOU KNOW, TO HAVE [RIPOFF REPORT] GO IN AND DROP SOME COLOR PHOTOS IN THERE, BUT I DID ALL OF THAT ON MYSELF. [ED MAGEDSON] HAS JUST OFFERED THE PLATFORM, YOU KNOW,** of the site because he is passionate about ending the death penalty. I wrote the article on Tracey just because I am sitting here going "what the hell is going on," and I was able to get some information and I have some information I'm still going to bring out.

On September 18, 2012, an extremely upset / distraught TRACEY RICHTER told ANNA RICHTER she was angry with SCA Smith, because she believed SCA Smith's testimony in her custody hearing was the reason she lost the custody case with Michael Roberts. ANNA RICHTER said she would contact DARREN MEADE because he planned to put something else out there (assumedly about SCA Smith). ANNA RICHTER said DARREN MEADE wanted something from ANNA RICHTER and wanted to publish this something on RIPOFF REPORT that very day. TRACEY RICHTER, still sobbing hysterically, told ANNA RICHTER she did not know what to do now that she lost custody of her kids, which she again blamed on SCA Smith. ANNA RICHTER said that is why **WE** are trying to "get [SCA Smith]" and that there was something else going on that she could not discuss with TRACEY RICHTER over the phone. TRACEY RICHTER said RUSSELL SCHERTZ told TRACEY RICHTER about a conversation DARREN MEADE had with "someone." ANNA RICHTER said "someone" is going to be investigating Michael Roberts. TRACEY RICHTER directed ANNA RICHTER to activate TRACEY RICHTER's Facebook page. ANNA RICHTER said her dream is to get SCA Smith disbarred. TRACEY RICHTER said the reason she did not get custody of her kids was because of SCA Smith's testimony at her custody hearing about her aforementioned correspondence with convicted child molester Jim Landa [Although, I am fairly certain TRACEY RICHTER's murder conviction and life imprisonment played some role in the Court's decision to give Michael Roberts' full custody of their children]. ANNA RICHTER said "well, that it is it, I am going to get ahold of [DARREN MEADE] to see if [he can do something]" about SCA Smith. ANNA RICHTER said she talked "to that one person." TRACEY RICHTER asked whether this was the same person that had previously spoken with DARREN MEADE, and ANNA RICHTER said it was.

On September 20, 2012, DARREN MEADE told Dr. Scott Connelly that RIPOFF REPORT owner / operator ED MAGEDSON planned to spend the night at DARREN MEADE's

Laguna Beach residence. Later, DARREN MEADE said he and ED MAGEDSON traveled together to San Diego where ED MAGEDSON purchased a boat.

On September 20, 2012, ED MAGEDSON sent the following e-mail to the producer of the Australian version of the U.S. television newsmagazine 60 Minutes:

Also - You may want to look into this story / I steak [sic] my reputation on this . :-)  
<http://www.ripoffreport.com/ben-smith-michael-roberts-rexxfield/prosecutorial-misconduct/sac-city-sac-county-iowa-B1A77.htm>

Darren, who I copied on this e-mail string could explain more.. but, The guy in this story (worth a 60 minutes story) in the above LINK is trying to go back to Australia as he is Australian / Michael Roberts He is also featured in this article here

<http://www.ripoffreport.com/organized-crime/google-cide-exposed/google-cideexposed-by-the-man-01cd6.htm>

<http://www.ripoffreport.com/Search/Michael%20Roberts.aspx>

author of the above Reports [sic] DARREN MEADE [sic] is located in Laguna Beach, California. Darren testified to FBI on several occasions about Michael Ross Roberts. RIPOFF REPORT has helped every TV News Magazine with stories over the last 15 years. We will never steer you wrong ! :-) HERE IS [DARREN MEADE's] CONTACT INFO  
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On September 21 2012, TRACEY RICHTER asked ANNA RICHTER what had been going on with "that guy (DARREN MEADE)" and whether DARREN MEADE had recently published anything on RIPOFF REPORT or any other place on the internet. ANNA RICHTER said DARREN MEADE published an article on RIPOFF REPORT, Google, and another place online. ANNA RICHTER said ED MAGEDSON / RIPOFF REPORT put up a disclaimer that DARREN MEADE had been publishing these RIPOFF REPORT complaints on his own volition. TRACEY RICHTER described the file sharing software / service Dropbox as an "online briefcases people can open if you send them a link." ANNA RICHTER said she asked DARREN MEADE whether she (ANNA RICHTER) should respond to Michael Roberts' comments, and that DARREN MEADE said he would take care of it. ANNA RICHTER said DARREN MEADE is going to create his own website. TRACEY RICHTER told ANNA RICHTER to print off RIPOFF REPORT complaint No. 938843 and send it to her at the prison. ANNA RICHTER said DARREN MEADE said he / RIPOFF REPORT planned to publish numerous pictures of TRACEY RICHTER with her children in effort to "humanize" her, which ANNA RICHTER had given to DARREN MEADE. TRACEY RICHTER said there should be pictures of her and the kids on her (TRACEY RICHTER's) computer. TRACEY RICHTER said RUSSELL SCHERTZ had the password for this computer. TRACEY RICHTER said RUSSELL SCHERTZ had like-pictures in boxes in his

garage.

On September 28, 2012, ANNA RICHTER told TRACEY RICHTER that DARREN MEADE had asked her and RUSSELL SCHERTZ for permission to put "good stuff" about TRACEY RICHTER up on RIPOFF REPORT. TRACEY RICHTER said she saw the pictures of Mary Higgins that DARREN MEADE published on RIPOFF REPORT and that they were horrible.

On October 7, 2012, in an e-mail to Dr. Scott Connelly, DARREN MEADE said the following about his deposition:

ALL of my corrections were NOT contained within the depositions you provided to [SCA Smith]. The agreement we had was clear, it would not be disseminated without garnering my approval. We had signed a mutual release shortly after I resigned from Progenex. This deposition was done as a favor to you personally before the case was dismissed to help in your settlement with Progenex. Ben Smith is essentially acting as Michael Roberts personal attorney in this matter. Why do you think the DA of Sac County Iowa would be requesting a deposition which was never entered into evidence, and the case, dismissed, between parties that already executed a Mutual Release? I [had] stated [SCA Smith] is 'essentially acting as Roberts' attorney', which is true. On April 2, 2012, I filed an update on RIPOFF REPORT [about Michael Roberts].

On October 10, 2012, DARREN MEADE told Dr. Scott Connelly that the damage caused by the dissemination of his "fake" depositions had cost DARREN MEADE employment opportunities and "millions of dollars."

On October 11, 2012, TRACEY RICHTER told her mother that in his September 9, 2012, RIPOFF REPORT complaint (No. 938843), DARREN MEADE inaccurately stated that State's witness Dr. John Pitman's medical practice was located in Chicago, Illinois, and that DARREN MEADE should correct the RIPOFF REPORT complaint to list the correct location of Dr. John Pitman's medical practice, Williamsburg, Virginia. TRACEY RICHTER directed her mother to bring this to DARREN MEADE's attention.

On October 19, 2012, ANNA RICHTER told TRACEY RICHTER that DARREN MEADE was unable to access certain videos and documents on his RIPOFF REPORT complaints and that he planned to call RIPOFF REPORT to get it fixed.

On November 2, 2012, DARREN MEADE asked his friend SIAMACK YAGHOBI the following: "Do you know anyone talented with making You Tube videos that might be willing to make a video for a small amount of money, it would be used to end Google-Cide."

On November 8, 2012, ANNA RICHTER told TRACEY RICHTER that she was worried about DARREN MEADE as she had not heard from him in two weeks. ANNA RICHTER said she tried to contact DARREN MEADE by e-mail and telephone numerous times, but he

had not responded.

On November 22, 2012, DARREN MEADE published an add-on complaint to his RIPOFF REPORT complaint No. 938843, which he titled "Michael Roberts of Mile2, Lies, and Audiotapes Causes (Alleged) Perjury of Sac County Attorney Ben Smith Case No. CDCD002755." The substantive content of this add-on / rebuttal is in keeping with its title.

On November 25, 2012, the anonymous author "VICTIM OF MICHAEL ROBERTS XELLE X MILE2" posted an add-on / complaint to Ripoffreport.com complaint No. 938843, claimed to have been groomed by State's witness MICHAEL ROBERTS to kill TRACEY RICHTER. Said add-on complaint, which purported to be authored by a fifteen-year-old sex abuse victim of Michael Roberts, alleged Michael Roberts was a drug abuser, homosexual, pedophile, and rapist. Said author claimed to have first hand knowledge that MICHAEL ROBERTS chose DUSTIN WEHDE to kill TRACEY RICHTER, and stated, among other things, the following:

I believed Michael Roberts would kill me if I spoke up. Michael had promised me that we would run off and have a new beginning as father and son the moment I followed his plan. He made the same offer to Dustin and promised they would leave town together that evening.

On November 25, 2012, anonymous author "TIMMY" published RIPOFF REPORT complaint No. 973523, with the following title: MICHAEL ROBERTS XELLE X REXXFIELD VACATION BIBLE SCHOOL VACATION BIBLE SCHOOL MOLESTER, YOUNG BOYS TRUST BETRAYED, GROOMING FOR ABUSE AND MURDER, INTERNET. The content of this RIPOFF REPORT complaint is in keeping with its title and is essentially identical to the content of a comment / rebuttal to RIPOFF REPORT complaint No. 938843.

On November 29, 2012, ANNA RICHTER told TRACEY RICHTER that something extremely important had to be done by that Monday, but that she could not talk about it with her over the phone. ANNA RICHTER said she had been exchanging text communications with DARREN MEADE, and DARREN MEADE had to get a hold of the attorney representing TRACEY RICHTER on the direct appeal of her murder conviction.

The following demonstrates the extremely important matter DARREN MEADE had to discuss with the attorney representing TRACEY RICHTER on appeal probably had something to do with this newly discovered evidence found by DARREN MEADE.

.....  
THE PHANTOM JUROR

As mentioned above, on April 26, 2012, ANNA RICHTER sent an e-mail from her account [anna\_richter2003@yahoo.com] to a local newspaper journalist, asking the journalist to look at the RIPOFF REPORT story published by DARREN MEADE. ANNA RICHTER told the journalist: "There is no doubt in my mind that some of the [members of the jury who convicted her daughter, TRACEY RICHTER, of murder] read the paper and internet that weekend and [TRACEY RICHTER's second ex-husband] made sure they were filled with his lies."

On June 1, 2012, DARREN MEADE posted the following on The Virginia Gazette's website: "One person purporting to have been a juror in the Richter murder trial claims to have [googled] TRACEY RICHTER and what they located online made them decide to convict her."

Coincidentally, this same thing happened to TRACEY RICHTER following her second felony conviction (perjury), which was on July 27, 2010, in the Clay County District Court (Iowa), Case No. FECR014399. On August 18, 2010, while her direct appeal of her felony perjury conviction was being prepared, someone purporting to be one of the Clay County jurors who convicted her wrote the following on the Storm Lake Pilot Tribune's website:

I was a juror at the 7/12/10 trial. **Her lawyer did not even show us a legal name change and presented no evidence.** During lunch break I googled her and learned the truth about her. There was no way I was going to let her walk.

In another coincidence, around the same time this anonymous juror published the above-mentioned comment, ANNA RICHTER wrote the following in a letter to then-Sac County Attorney Earl Hardisty:

I'm sure that you found out that [TRACEY RICHTER] was found guilty of perjury in [Clay County]. **Funny how her attorney refused to put on a defense for her, saying there was no need to.** Naturally we are appealing it.

In her motion for new trial filed October 6, 2010, TRACEY RICHTER offered up this supposed instance of juror misconduct as grounds for a new criminal trial:

There appeared an internet posting on or about August 18, 2010 on the Storm Lake Pilot Tribune website in apparent response to a reprint of an article on the 2001 Early shooting case in which the Dustin Wehde died in the Defendant's home. The internet posting indicated that 'I was a juror at the 7/12/10 trial. Her lawyer did not even show us a legal name change and presented no evidence. During lunch break I googled her and learned the truth about her. There was no way I was going to let her walk.



.....

On December 10, 2012, ANNA RICHTER told TRACEY RICHTER that RIPOFF REPORT owner ED MAGEDSON wanted BERT PITMAN to send ED MAGEDSON and DARREN MEADE certain information.

On December 14, 2012, at TRACEY RICHTER's direction, DARREN MEADE published RIPOFF REPORT complaints Nos. 982235 and 981918, which are open letters from TRACEY RICHTER to her and Michael Roberts' children, N.R. and M.R. These "letters" were clearly intended to reach Michael Roberts' minor children when their names are entered into a Google.

RIPOFF REPORT complaint No. 982235, which is DARREN MEADE's / TRACEY RICHTER's open letter to Michael Roberts daughter, M.R. then 12 years old, is titled:

[M.R.] – [M.R.] / MICHAEL ROBERTS REXXFIELD FOUND TO ABUSE CHILDREN AND WIFE TRACEY RICHTER CONTINUES ABUSE BY REFUSING TO ALLOW MOTHER AND DAUGHTER TO CONTACT ONE ANOTHER / MILE2 CHILD ABUSE MILE2, DR HEIDI ROBERTS CONDONES ABUSE OF [M.R.] AND [N.R.] GOOGLE-CIDE, DR SCOTT CONNELLY INTERNET

RIPOFF REPORT complaint No. 981918, which is DARREN MEADE's / TRACEY RICHTER's open letter to Michael Roberts son, N.R., is titled:

[N.R.] - Michael Roberts Rexxfield Abusing Children By Refusing Contact His Mother TRACEY RICHTER \ 60 Minutes Australia \ Mile2 \ Sac County Prosecutor Ben Smith \ [M.R.] \ Google-cide

TRACEY RICHTER and DARREN MEADE's above-mentioned letters to N.R. and M.R., and their add-on complaints and the content of the complaints behind the numerous inserted hyperlinks, are filled with demeaning and defamatory content about their father, Michael Roberts, which, if taken at face value, would be extremely distressing to a child.

**DARREN MEADE and TRACEY RICHTER's "letters" to here to N.R. and M.R. were clearly intended to reach Michael Roberts' minor children via Google. In fact, as of July 5, 2014, when "[N.R.'s full name] and [M.R.'s full name]" is searched using Google, DARREN MEADE and TRACEY RICHTER's letters to N.R. and M.R. appear first and second, respectively, on the first page of the Google search result.**

On January 5, 2013, ED MAGEDSON / RIPOFF REPORT (Editor@ripoffreport.com) told DARREN MEADE dmeade@kairos-meade.com) that private investigator Tina Church wanted to help with TRACEY RICHTER's case and directed DARREN MEADE to contact private investigator Tina Church.

On January 6, 2013, DARREN MEADE (dmeade@kairos-meade.com) sent the following in an e-mail to private investigator Tina Church, which he copied to ED MAGEDSON / RIPOFF REPORT (EDitor@ripoffreport.com) and ANNA RICHTER (anna\_richter2003@yahoo.com):

I enjoyed our previous conversations, and was hopeful we might be able to utilize your name and know-how, to what I had uncovered in regards to the 'abuse of process', 'prosecutorial misconduct', 'witness intimidation' and wrongful prosecution of TRACEY RICHTER. We had spoken about working together to not only help TRACEY RICHTER but others suffering the same travesty of justice. In good faith I put you in touch with both ED MAGEDSON of Ripoff Report and ANNA RICHTER the mother of TRACEY RICHTER. Tina, is it possible to authenticate that you are in fact the known private investigator Tina Church, whom worked often with Innocent Project? I've come across multiple electronic artifacts that have linked you to Michael Roberts / Rexxfield. Michael Roberts is the master mind whom has placed TRACEY RICHTER in prison for life without the possibility of parole, conspired to have me killed (which is on audio tape) and 4 months ago began offering \$2,500 for anyone woman to come forward and provide testimony that I raped them. TRACEY RICHTER is innocent, if you can help her family, then they certainly need your help. Equally, you can take the work I have done, and call it your own.

On January 6, 2013, ED MAGEDSON / RIPOFF REPORT wrote the following in an e-mail to private investigator Tina Church, which he copied to DARREN MEADE (dmeade@kairos-meade.com) and ANNA RICHTER (anna\_richter2003@yahoo.com):

When you called me the other night you made a comment to me that was very disturbing to me. You stated to me, DARREN MEADE told you that he worked for me.. Darren would never lie. He never has and will not be working for Ripoff Report. This is a well-known claim by Michael Roberts. **AGAIN, I HAVE NEVER EVER KNOWN DARREN TO TELL A LIE, OR EVEN SWAY FROM THE TRUTH IN THE SLIGHTEST BIT. IF HE IS NOT SURE OF SOMETHING, HE WILL NOT SAY IT. DARREN IS THE REAL DEAL.** If Darren is wrong, or I am wrong - I hope you will understand our concern here.

On January 8, 2013, RIPOFF REPORT owner ED MAGEDSON (EDitor@ripoffreport.com) wrote the following in an e-mail to private investigator Tina Church:

I am not sure if you are who you say you are, .. and if you could be somehow not a double agent ... For all I know, you think Michael Roberts' is not guilty and you want to try and save him.. I have no idea what is going on – but, something is not right. **ALL I WANT.. I WANT TO DO ANYTHING THAT HELPS FREE TRACEY** - - I want to do anything that helps those that are not guilty – after rescuing dogs from being euthanized every day, and my website helping consumers – the only other thing on my wish list is to help those you are sitting on death row and those that got life wrongfully. Again, if I am wrong – and you are smart, .. you can see why I feel the way I do. **I AM WILLING TO FEATURING ARTICLES AND**

**PLACE ADVERTISEMENTS FOR THE CAUSE ON MY WEBSITE.**

On January 9, 2013, the Iowa court of appeals affirmed TRACEY RICHTER's murder conviction.

On January 9, 2013, ANNA RICHTER told TRACEY RICHTER she lost her appeal. ANNA RICHTER said she published a comment on RIPOFF REPORT that TRACEY RICHTER was not able to bring up new information on her direct appeal. ANNA RICHTER said DARREN MEADE wanted TRACEY RICHTER's attorney to serve him with a subpoena, concerning threats he alleged SCA Smith made to him. ANNA RICHTER said she had things that she needed to discuss with DARREN MEADE. TRACEY RICHTER said they needed to subpoena this information from DARREN MEADE to "keep him out of the middle."

On January 9, 2012, DARREN MEADE published an add-on complaint to his September 9, 2012, RIPOFF REPORT complaint No. 938843, which he titled: THE EVIDENCE OF PROSECUTORIAL MISCONDUCT AND WITNESS TAMPERING CANNOT BE INTRODUCED UNTIL AFTER THE "DIRECT APPEAL" (WHICH MEAN ONLY EVIDENCE FROM THE TRIAL) IS EXHAUSTED. In this comment / add-on complaint, DARREN MEADE published the following statements TRACEY RICHTER's fiancé, RUSSELL SCHERTZ, made about the Court's decision:

[RUSSELL SCHERTZ] admits the decision will cost Richter, and her family, "years that they cannot get back." Richter's appeal was what's called a "direct appeal," which means it could only include evidence in the court record from the trial. But, Schertz says he's uncovering new information about "prosecutorial misconduct and witness tampering" that he thinks should allow for a new trial in the future. For now, Schertz says the family will file an appeal with the Iowa Supreme Court in the next 20 days.

On January 10, 2013, ANNA RICHTER told TRACEY RICHTER that DARREN MEADE was upset that TRACEY RICHTER lost her direct appeal of her murder conviction. ANNA RICHTER and TRACEY RICHTER discussed the post-conviction relief (PCR) process versus that of the direct appeal; specifically, that new evidence can be considered in a PCR action. ANNA RICHTER said DARREN MEADE told her he discovered information that proved Michael Roberts had motive to frame Dr. John Pitman for TRACEY RICHTER's murder. ANNA RICHTER said they needed to attack the testimony of the State's witnesses. ANNA RICHTER said she and high school graduate DARREN MEADE discussed trial strategy, specifically, putting doubts in the jurors' minds. ANNA RICHTER said DARREN MEADE planned to publish a RIPOFF REPORT complaint about the horrible job he believed TRACEY RICHTER's criminal defense attorneys did in representing her. Later, the two discussed why they believed Michael Roberts was homosexual.

On January 11, 2013, DARREN MEADE (dmeade@kairos-meade.com), in an e-mail to ANNA RICHTER (annar\_richter2003@yahoo.com), RUSSELL SCHERTZ (rschertz@cox.net), and DONNA BISTRICAN (bcbdonna@gmail.com) said he created the website TraceyRichter.com, and asked the group to have their friends and family to spend a couple hours per week creating additional links to the site. The website www.TraceyRichter.com is replete with links to all the RIPOFF REPORT complaints concerning the State's witnesses that are referenced in this affidavit. It also provides links to the following active social media accounts purporting to be owned, controlled, and authored by TRACEY RICHTER: Facebook.com, YouTube.com, Twitter.com, AboutMe.com, and others, all of which contain recent (as recently as June 10, 2014) posts, comments, and other content that link to the RIPOFF REPORT articles about the State's witnesses. DARREN MEADE also told them the content up on TraceyRichter.com should be more from their voices, not his, and that creating these additional profiles and links to the website would make them all more visible on Google-type search results (thus making the RIPOFF REPORT complaints more visible). Also in this e-mail, DARREN MEADE provided the above-named recipients with the login, password, and e-mail (freetraceyrichter@gmail.com) for the website.

On January 12, 2013, ANNA RICHTER told TRACEY RICHTER that ANNA RICHTER's son, JOHN RICHTER, a police detective from another state, obtained information about Dr. John Pitman's arrest and had given it to her. ANNA RICHTER said BERT PITMAN told her that Dr. John Pitman spends all his money on prostitutes. Dr. John Pitman had been arrested pursuant to a bench warrant for failing to appear for court in a civil matter, and the contempt charge was never adjudicated.

On January 13, 2013, ED MAGEDSON directed DARREN MEADE to contact private investigator Tina Church to discuss their "strategy."

On January 13, 2013, ANNA RICHTER (anna\_richter2003@yahoo.com) sent the following e-mail to BERT PITMAN (bpitman09@gmail.com):

Contact [reporter's name]@vagazette.com, [a reporter from the Virginia Gazette]. I told him about [Dr. John Pitman's] arrest and other things regarding his taking money from you and not paying for your college and his girlfriend from Canada. I told him you have more info on her than I do. Sorry but after what your dad did to Tracey I want him to know how it feels to have his name in the paper and not in a good way. Once we get the mugshot of him Darren is going to do a piece on him. I also gave this Carter the Ben Smith Website and the new one on your mom which I sent you. I hope we can get him interested. Don't put it off. This is important.

On January 14, 2012, DARREN MEADE published yet another add-on complaint to his

September 9, 2012, RIPOFF REPORT complaint (No. 938843), in which high school graduate DARREN MEADE explained to readers that difference between a direct appeal and a habeas corpus action (Post Conviction Relief). Specifically, that newly discovered evidenced, such as “prosecutorial misconduct” and “witness tampering” can be introduced in the latter to obtain a new trial, and not in the former.

On January 14, 2013, TRACEY RICHTER asked ANNA RICHTER if there was a “mug shot” of Dr. John Pitman. ANNA RICHTER told TRACEY RICHTER that Dr. John Pitman is pushing his surgery practice into the ground. TRACEY RICHTER stated she hoped to get more information on Dr. John Pitman and that she wanted to see Dr. John Pitman's mug shot. ANNA RICHTER said she e-mailed ED MAGEDSON, the owner / operator of RIPOFF REPORT, and “that one attorney,” which the two had discussed earlier. ANNA RICHTER said she e-mailed ED MAGEDSON and DARREN MEADE about ED MAGEDSON something believed to be related to TRACEY RICHTER's case and RIPOFF REPORT. ANNA RICHTER said BERT PITMAN posted a lot of this content on Facebook. TRACEY RICHTER said they needed to get sworn statements from people but that she did not want to mention any names over the phone.

On January 14, 2013, ANNA RICHTER told TRACEY RICHTER that DARREN MEADE asked her for documents from the wrongful death lawsuit brought against TRACEY RICHTER by Dustin Wehde's estate.

On January 21, 2013, author “BRETT COLLINS” published RIPOFF REPORT complaint No. 1000888, titled “DR. JOHN PITTMAN THE THIRD, MEDICAL DOCTOR PLASTIC SURGERY CENTER NAME, PITTMAN SURGICAL ASSOCIATES, A STRANGE EX-HUSBAND KEY WITNESS ARRESTED BY SIX ARMED OFFICERS PLASTIC SURGERY PRACTICE, UNITED STATES ARMY COL.” Among other things, this RIPOFF REPORT complaint accuses Dr. John Pitman of committing perjury, compounding felonies, ongoing illicit drug use / abuse, and associating with strippers and hookers. The article continues, alleging that Dr. John Pitman is driving his practice into the ground with “shabby work.” [During one of their phone conversations, ANNA RICHTER told TRACEY RICHTER that Dr. John Pitman “was driving his practice into the ground”]. Also in this complaint are links to other RIPOFF REPORT complaints concerning Dr. John Pitman.

On January 22, 2013, BERT PITMAN sent the following e-mail message to the Virginia Gazette; shortly thereafter, he forwarded the message to ANNA RICHTER as proof he completed the task which she had given him:

To whom it may concern, My grandmother, ANNA RICHTER, had informed me about a week ago that she had e-mailed you about my father John Pitman and mother TRACEY RICHTER. I would like to speak with you about very important recent and past occurrences.

Including his recent arrest, his possession of the police report on the house invasion/ "murder", his relationship with Allisan "lachesis" tucker, and many other important and case breaking actions committed by my father. John Pitman has painted a picture of himself and his life that is nothing other than a facade. Sorry it took a little while to contact you, I have been very busy moving to Richmond, working and obviously this has been a extremely tough situation for a son to be in. My number is 7575855037, please call me at your convenience.  
BERT PITMAN.

On January 25, 2013, add-on complaint (rebuttal) to RIPOFF REPORT complaint No. 1000888, titled "DR. JOHN PITMAN AND MICHAEL ROBERTS REXXFIELD CAUGHT RED-HANDED," was published on RIPOFF REPORT. In this add-on complaint, anonymous author, "2 DEADBEAT DADS" alleged, among other things, that Michael Roberts and Dr. John Pitman were responsible for Dustin Wehde's murder. The following excerpt was contained in the body of the complaint: "[Michael Roberts] told Dateline NBC of wanting to kill John Pittman prior to 2001, and that Roberts claimed he had more money than Pittman and would outspend him in the custody hearings over his stepson." [TRACEY RICHTER and ANNA RICHTER discussed this same subject matter (Michael Roberts wanting to kill Dr. John Pitman) - in one of their prison phone conversations right before "2 DEADBEAT DADS" published this RIPOFF REPORT complaint, which concerned the very same subject matter]

On January 25, 2013, an add-on complaint (rebuttal) to RIPOFF REPORT complaint No. 1000888, titled "DR. JOHN PITTMAN AND MICHAEL ROBERTS VEGAS ORGIES, SHE/HE AND HE/HE TWISTER, DR. PRESCRIBING PAIN PILLS FOR SEX FUELED NIGHTS," was published on RIPOFF REPORT. The substantive content of this add-on complaint, which was authored by anonymous author "SHARED VICTIMS," is in keeping with the subject matter described in its title. This add-on complaint, like most, if not all the other RIPOFF REPORT complaints concerning the State's witnesses, contains numerous hyperlinks that redirect viewers / readers to other RIPOFF REPORT complaints about the State's witnesses.

On January 25, 2013, an add-on complaint (rebuttal) to RIPOFF REPORT complaint No. 1005913 was published on RIPOFF REPORT with the following title:

DR. JOHN PITTMAN CHEATS ON WIFE LISA PITTMAN WITH RAPPER. DR. JOHN PITTMAN BROKE WITH MULTIPLE TAX IRS TAX LIENS, FINANCES VIDEO FOR RAPPER WHICH HAS A BRUTAL HOME INVASION MURDER SIMILAR TO THE HUSBAND CHEATS ON DEAD FISH WIFE LISA PITMAN, ALLISON TUCKER, TRACEY RICHTER MURDER TRIAL, SAC COUNTY IOWA WILLIAMSBURG, VIRGINIA

On January 30, 2013, author "LACHESIS" published RIPOFF REPORT complaint No. 1005913, the content of which is in line with its title:

DR. JOHN PITMAN CHEATS ON WIFE LISA PITMAN WITH RAPPER LACHESIS. DR JOHN PITMAN BROKE WITH MULTIPLE TAX IRS TAX LIENS, FINANCES VIDEO FOR LACHESIS WHICH HAS A BRUTAL HOME INVASION MURDER SIMILAR TO THE HUSBAND CHEATS ON DEAD FISH WIFE LISA PITMAN, ALLISAN TUCKER, TRACEY RICHTER MURDER TRIAL, SAC COUNTY IOWA WILLIAMSBURG, VIRGINIA."

On January 31, 2013, ANNA RICHTER told TRACEY RICHTER she was unable to locate certain information concerning the **CHILDREN** of one of the State's witnesses. TRACEY RICHTER asked if there was any new news on Dr. John Pitman. ANNA RICHTER said there was a story on the internet concerning Dr. John Pitman, but ANNA RICHTER thought it was authored by someone else. ANNA RICHTER said the RIPOFF REPORT article on Dr. John Pitman was crazy, because it was about Dr. John Pitman having orgies and being fat. ANNA RICHTER then said something to the following effect: **DR. JOHN PITMAN IS NOT GOING TO HAVE ANY MONEY BECAUSE OF THESE RIPOFF REPORT ARTICLES.** TRACEY RICHTER said BERT PITMAN had once said Dr. John Pitman had orgies. ANNA RICHTER said she was debating whether to publish an add-on complaint / comment on the RIPOFF REPORT complaints concerning Dr. John Pitman. TRACEY RICHTER said it would be better if "**WE**" do not have any personal connection to the negative stories. ANNA RICHTER claimed she did not know who wrote the "crazy stuff" about Dr. John Pitman.

On February 5, 2013, DARREN MEADE published RIPOFF REPORT complaint No. 1009000, the subject matter of which is in keeping with its title:

MILE2 MICHAEL ROBERTS REXXFIELD RAYMOND FRIEDMAN" WRITES MILE2 MICHAEL ROBERTS REXXFIELD RAYMOND FRIEDMAN MARIE FRIEDMAN GRAPHIC DEPICTIONS OF CHILD MOLESTATION, CHILD TORTURE, EXACT RECIPES OF LIQUID EXPLOSIVES, TYPE BOMBS ILLICIT RECORDINGS, INTERNET.

On February 6, 2013, anonymous author "RAID" published an add-on complaint (rebuttal) to RIPOFF REPORT complaint No. 1009000, the subject matter of which is in keeping with its title: MICHAEL ROBERTSON RAYMOND FRIEDMAN MADE MILE2 CEASE TO EXIST OUT OF FEAR OF THE CHILD TORTURE PORN ON YOUR FREE MIGHT PUT US OUT OF BUSINESS.

On February 7, 2013, TRACEY RICHTER relayed a phone number to ANNA RICHTER using a code the two developed. The coded message, which was later deciphered, was the phone number of a school TRACEY RICHTER and RUSSELL SCHERTZ believed one of her and Michael Roberts' child M.R. was currently attending. TRACEY RICHTER said RUSSELL SCHERTZ had called the school, but that it would not give him any information because he was not immediate family. TRACEY RICHTER directed ANNA RICHTER to call

the school. ANNA RICHTER said DARREN MEADE told her the copy of his deposition that was given to SCA Smith by Dr. Scott Connelly was fake.

On February 14, 2013, ANNA RICHTER told TRACEY RICHTER that DONNA BISTRICAN posted something on Facebook about TRACEY RICHTER's case. TRACEY RICHTER directed ANNA RICHTER to have BERT PITMAN post something similar on Facebook. ANNA RICHTER said DARREN MEADE and ED MAGEDSON / RIPOFF REPORT planned to publish another RIPOFF REPORT complaint [presumably concerning the State's witnesses]. TRACEY RICHTER said "stuff is coming out about Dr. John Pitman." Then, just as ANNA RICHTER mentioned DARREN MEADE's name, TRACEY RICHTER directed her to stop talking about [DARREN MEADE, Dr. John Pitman, and RIPOFF REPORT] over the phone, and that the two would talk about it in person during ANNA RICHTER's next visit to the prison. ANNA RICHTER said she had information to pass along to TRACEY RICHTER from DARREN MEADE, but that she would wait and tell it to TRACEY RICHTER during her next visit with her at the prison TRACEY RICHTER at the prison. Later during their conversation, ANNA RICHTER said she stored e-mails from RIPOFF REPORT on her computer.

On February 17, 2013, TRACEY RICHTER sent a letter to DONNA BISTRICAN asking her to manage her e-mail, social media, and other online accounts. In this same letter, TRACEY RICHTER wrote she believed SCA Smith or DCI SA Vileta were linked to her prison counselor and that her prison counselor had been in contact with someone connected to [Michael Roberts], but TRACEY RICHTER did not know which one (either SCA Smith or DCI SA Vileta) because "the FBI [would not] give [her and her family / friends] a name at this point."

On March 6, 2013, in an add-on complaint (rebuttal) published in RIPOFF REPORT No. 938843, anonymous / fictitious author "BETHANY" made comments generally defaming MICHAEL ROBERTS. Interestingly, at the bottom of this rebuttal / comment, author "BETHANY" just so happened to include a link to DARREN MEADE's website [www.cyberbountyhuntersblog.com](http://www.cyberbountyhuntersblog.com).

On March 7, 2013, DARREN MEADE published State's witness Michael Roberts' wife's (Heidi Forsbacka) bank account information on his website [cyberbountyhunger.com](http://cyberbountyhunger.com). The manner in which this information appeared or was displayed on DARREN MEADE's website and other circumstances strongly suggest Ms. Forsbacka's banking information was obtained illegally (i.e., computer hacking). Later, on April 8, 2013, DARREN MEADE sent an e-mail message wherein he freely admitted possessing and publishing Michael Roberts' wife's banking information.

On March 22, 2013, BERT PITMAN told TRACEY RICHTER that he planned to give "the



addresses to the group.”

On April 2, 2013, ANNA RICHTER told TRACEY RICHTER that she called BERT PITMAN about an internet article / news story concerning TRACEY RICHTER, which ANNA RICHTER believed Dr. John Pitman published and / or authored. ANNA RICHTER said DARREN MEADE had “all kinds of stuff up” in response to this article. ANNA RICHTER further told TRACEY RICHTER that “this is the last straw” as for Dr. John Pitman, and that she planned to “fight back.” TRACEY RICHTER directed ANNA RICHTER to get DARREN MEADE to put “all these things together.”

On April 2, 2013, ANNA RICHTER and TRACEY RICHTER cryptically discussed State’s witness Mary Higgins. ANNA RICHTER said her and DONNA BISTRICAN recently had a discussion about State’s witness Mary Higgins. The following demonstrates that TRACEY RICHTER and ANNA RICHTER have been using DONNA BISTRICAN to intimidate State’s witness Mary Higgins since before TRACEY RICHTER’s murder trial started.

.....  
DONNA BISTRICAN

On September 21, 2011, TRACEY RICHTER wrote the following letter to ANNA RICHTER from the Sac County Jail:

[State’s witness Mary Higgins] is crazy, no wonder [Mary Higgins] didn’t have any friends. [Mary Higgins] needs to get her [medication] adjusted and go to church. Our talk last night helped me a great deal. Please send my best to [DONNA BISTRICAN]. I miss her. I was also upset over [Mary Higgins’] comments about [DONNA BISTRICAN]. It was mean spirited and unnecessary. [DONNA BISTRICAN] doesn’t have a mean or dishonest bone in her body. She never did anything to warrant [Mary Higgins’] cruelty.

In late September 2011 or early October 2011, about three weeks before TRACEY RICHTER’s murder trial started, Mary Higgins was jogging not far from her rural Early, Iowa, farmstead on the gravel roads on which she always jogged, when she saw a larger than normal rock lying near the middle of the gravel road. Underneath the rock, Mary Higgins found a note which said, “**DEMON BE GONE.**” The note also had numbers on it. Mary Higgins reluctantly provided the above-information to law enforcement out of concern for her and her family’s safety on October 4, 2011.

A Des Moines, Iowa resident since 2010, DONNA BISTRICAN had previously been neighbors in Early, Iowa. DONNA BISTRICAN is one of TRACEY RICHTER’s most loyal,

dedicated followers. Information provided to law enforcement suggests DONNA BISTRICAN was in the Early, Iowa area around the time State's witness Mary Higgins found this note.

Shortly after Michael Roberts filed for divorce from TRACEY RICHTER, which was on or around May 7, 2004, DONNA BISTRICAN sent Michael Roberts the following in an e-mail, which served as an electronic exorcism or "e-exorcism" of Michael Roberts: "In Jesus name I bind Satan and his **DEMONS TO COME OUT OF YOU** (Michael Roberts) now and get away from you (Michael Roberts) now." In a communication to JOHN RICHTER in February 2012, DONNA BISTRICAN admitted to sending this e-mail to Michael Roberts.

Mary Higgins and her family have reported that their farmstead residence has been burglarized at least five times since TRACEY RICHTER was convicted of murder (November 7, 2011). Following one of these break-ins, the lock from the home's front door had been removed, reassembled, and placed in the center of their kitchen floor. Another time they returned home to find their kitchen chairs turned upside-down.

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On April 11, 2013, TRACEY RICHTER and ANNA RICHTER discussed getting Dr. John Pitman to sign an affidavit swearing the information / statements attributed to him in an online article in the online UK newspaper "The Daily Mirror" were false. TRACEY RICHTER told ANNA RICHTER to have BERT PITMAN get Dr. John Pitman to retract these statements. TRACEY RICHTER told ANNA RICHTER to have BERT PITMAN get certain information about Michael Roberts and Dr. John Pitman, and give it to either DARREN MEADE or ED MAGEDSON / RIPOFF REPORT. ANNA RICHTER said more and more people "from out there" believed Dr. John Pitman hired Dustin Wehde to attack / kill TRACEY RICHTER, and that she would discuss it more in detail during her next visit to the prison. TRACEY RICHTER told ANNA RICHTER to get the password for the laptop in ANNA RICHTER's possession from her fiancé, RUSSELL SCHERTZ.

On April 15, 2013, SCA Smith moved to quash a subpoena issued to the Sac County Sheriff by TRACEY RICHTER in the contempt action she filed in the Buena Vista County, Iowa, District Court against Michael Roberts for non-payment of child support. In said motion, to address another like-subpoena TRACEY RICHTER's custody / child support attorney issued to DARREN MEADE for the "names and individuals that you know have been threatened by [SCA Smith]," SCA Smith discussed DARREN MEADE's aforementioned deposition, wherein DARREN MEADE testified he knowingly consorted and conspired with

convicted felons to harass and defame a witness in a civil matter. Also included in SCA Smith's motion was a reference to DARREN MEADE's deposition testimony concerning RIPOFF REPORT:

RIPOFF REPORT never deletes anything written about somebody. So it's the perfect place to defame somebody because it will always stay up, and for some reason it winds up ranking on the first page of Google. So if you want to destroy somebody's reputation, that's a great place to do it.

On April 17, 2013, ANNA RICHTER told TRACEY RICHTER that she had just gotten off the phone with an FBI agent. Then the two discussed what TRACEY RICHTER's attorney needed to subpoena, but agreed they should not talk about it over the phone. ANNA RICHTER said that "a certain person" would be calling TRACEY RICHTER's child support / custody attorney, but did not want to tell TRACEY RICHTER who the "someone" was or talk about the matter over the phone any further.

On or around April 18, 2013, ANNA RICHTER sent DARREN MEADE a Western Union Money Gram in the amount of \$400.00, which he deposited into his Bank of America account.

On April 18, 2013, DARREN MEADE asked a friend whether the friend knew "someone who had time to "make one to two videos for [DARREN MEADE] per week." DARREN MEADE told this person that he had written "two of the scripts and wish to find someone whom could make the videos have the look and feel of a breaking news story such as CNN did with the recent bombings in Boston."

On April 25, 2013, ANNA RICHTER told TRACEY RICHTER she wanted to go after Dr. John Pitman (or SCA Smith) with a vengeance. TRACEY RICHTER asked ANNA RICHTER whether "they" are putting certain information into the video [presumably a video about the State's witnesses]. ANNA RICHTER responded that they should making this video because she, ANNA RICHTER, had given "them" the information.

On April 30, 2013, an e-mail containing a "non-indexed" link accessing a copy of SCA Smith's aforementioned Motion to Quash (MTQ) was sent to ED MAGEDSON's e-mail address (EDitor@ripoffreport.com), which ED MAGEDSON accessed and viewed, then forwarded to DARREN MEADE, who also accessed and viewed the same. ED MAGEDSON's viewing SCA Smith's MTQ was at least the second time ED MAGEDSON / RIPOFF REPORT was made of aware of DARREN MEADE's deposition (SCA Smith's MTQ referenced and cited DARREN MEADE's deposition) – the same deposition in which DARREN MEADE testified that RIPOFF REPORT was a "great place to destroy someone's reputation" and that he was hired by convicted felons to harass and defame a witness via the internet.

"Non-indexed" links (or URL's uniform resource locators") host content which is intentionally hidden from search engine results pages thus restricting access to the link from anyone using common search engine tools to discover online content. In this case, the links could only be accessed (or opened) by directly clicking on the link contained in the body of an e-mail delivered to a targeted individual. Accessing or clicking the link is recorded on the server hosting the URL and the server's log files automatically records the date and time (in GMT) as well as the Geolocation of the IP address of the recipient's computer used to access their e-mail account. Any such IP recovery data can only be recorded by those directly receiving the e-mail from the originating sender or those individuals who are forwarded the e-mail from the intended "target" (or "recipient zero") of the e-mail. Therefore, the first IP recorded in this instance was traced to ED MAGEDSON, who then forwarded it to an individual who opened it disclosing an IP address linked to DARREN MEADE's computer.

On May 5, 2013, TRACEY RICHTER and ANNA RICHTER discussed the letter TRACEY RICHTER's child support / custody attorney wrote to the Sac County Board of Supervisors, wherein said attorney accused SCA Smith of committing a crime and violating an ethical rule. TRACEY RICHTER told ANNA RICHTER to "feel free to give a copy of the letter to 'someone' if they wanted one." Later, TRACEY RICHTER expressly told ANNA RICHTER to have DARREN MEADE published the letter on the internet and give a copy of it to DONNA BISTRICAN.

On May 6, 2013, an e-mail containing a "non-indexed" link to a YouTube video described below in "The Glenn Puit Disappearing RIPOFF REPORT Complaint" was sent to ED MAGEDSON's e-mail address (EDitor@ripoffreport.com), which, like the non-indexed link mentioned above, ED MAGEDSON accessed and viewed, then forwarded to DARREN MEADE, who accessed and viewed it.

.....  
GLENN PUIT'S DISAPPEARING RIPOFF REPORT COMPLAINT

Back in January 2012, ED MAGEDSON and DARREN MEADE solicited the services of investigative journalist Glenn Puit to create what would become RIPOFF REPORT complaints Nos. 828918 and 829020. The following factual assertions can be taken from DARREN MEADE's e-mail and other communications to and from ED MAGEDSON and others between December 2011 through February 2012: ED MAGEDSON paid DARREN MEADE to work directly with investigative journalist, Glenn Puit. ED MAGEDSON

personally directed content edits and changes to Glenn Puit's work. ED MAGEDSON / RIPOFF REPORT's attorneys reviewed Glenn Puit's complaint before it was published on RIPOFF REPORT's website. ED MAGEDSON asked that Glenn Puit address specific issues and allegations against certain individuals in his article. ED MAGEDSON directed DARREN MEADE to create other RIPOFF REPORT complaints. ED MAGEDSON had DARREN MEADE edit various RIPOFF REPORT complaints to include certain content so that these complaints would be more visible and rank higher on internet search results. ED MAGEDSON suggested that DARREN MEADE format DARREN MEADE's complaints in a way that would make them more viewer friendly. DARREN MEADE told investigative journalist Glenn Puit the only way ED MAGEDSON would allow certain audio / visual content to appear in journalist's complaint is through DARREN MEADE and if the articles were beneficial to RIPOFF REPORT's interests. ED MAGEDSON directed DARREN MEADE to "create new titles for the preexisting derogatory RIPOFF REPORT complaints about DARREN MEADE. ED MAGEDSON promised to "optimize" them so that existing unfavorable RIPOFF REPORT complaint(s) about DARREN MEADE would be effectively removed from the internet.

On January 11, 2012, ED MAGEDSON / RIPOFF REPORT paid DARREN MEADE \$2,500.00 (check No. 002498) with the memo "[Public Relations] thru Feb 15<sup>th</sup> 2012."

On January 23, 2012, when asked whether Glenn Puit's anticipated RIPOFF REPORT complaint would be a "featured" RIPOFF REPORT complaint, DARREN MEADE said: "I don't believe the first article will be linked on every page, [because there was] no benefit to ROR."

As mentioned earlier, on January 26, 2012, Journalist Glenn Puit, published RIPOFF REPORT complaint No. 829020. The original report's headline was simply "COMPLAINT REVIEW: GOOGLE-CIDE: THE FULL STORY PROGENEX LEADERS ADAM ZUCKERMAN, RYAN PAGE," and the title's first sentence read: "PROGENEX MANAGERS ADAM STUART ZUCKERMAN AND RYAN PAGE NEGOTIATE CONTRACT WITH REXXFIELD ONLINE REPUTATION MANAGEMENT MICHAEL ROBERTS IN ATTEMPT TO COMMERCIALIZE INJECTION SOURCE CODE." The article was a damning account of the criminal activities of convicted felons ADAM ZUCKERMAN and KIRK MCMAHAN described earlier herein.

Glenn Puit's original RIPOFF REPORT complaint here was originally published and was located at the following URL address: <http://www.ripoffreport.com/business-consultants/google-cide-the-full/google-cide-the-full-story-b3660.htm>

Sometime on or after March 13, 2012 but before April 30, 2013, ED MAGEDSON or another RIPOFF REPORT agent created an unauthorized duplicate copy of Glenn Puit's article and

therein effected subtle changes with the clear intent of increasing harm done to Michael Roberts. The following is the new URL for the duplicated / edited RIPOFF REPORT complaint: <http://www.ripoffreport.com/r/Michael-Roberts-Rexxfield-Google-cide-The-Full-Story-Progenex-leaders-Adam-Stuart-Zuckerman-Ryan-Page/Costa-Mesa-California-92626/Michael-Roberts-Rexxfield-Progenex-Managers-Adam-Zuckerman-and-Ryan-Page-negotiate-contr-829020>

On May 27, 2014, ED MAGEDSON or another RIPOFF REPORT agent made substantive changes to the article in that he changed both the heading and sub-heading to draw more attention to Michael Roberts and his business, Rexxfield. The headline was changed to following: "COMPLAINT REVIEW: MICHAEL ROBERTS, REXXFIELD, GOOGLE-CIDE: THE FULL STORY PROGENEX LEADERS ADAM STUART ZUCKERMAN, RYAN PAGE"; and the first sentence of the title was changed to: "MICHAEL ROBERTS, REXXFIELD, PROGENEX MANAGERS ADAM ZUCKERMAN AND RYAN PAGE NEGOTIATE CONTRACT WITH REXXFIELD ONLINE REPUTATION MANAGEMENT MICHAEL ROBERTS IN ATTEMPT TO COMMERCIALIZE INJECTION SOURCE CODE."

The changes made by RIPOFF REPORT administrators to the duplicated article's sub-heading / title and URL serve no purpose except to increase the damage done to Michael Roberts. The extra emphasis on Michael Roberts' personal name and business name in both the sub-heading / title and more conspicuously, in the URL, is clearly an attempt by RIPOFF REPORT to use generally accepted "Search Engine Optimization" techniques in order to persuade Google and other search engines to elevate this RIPOFF REPORT complaint in search results for Michael Roberts' name.

On or about April 30, 2013 SCA Smith discovered the unauthorized derivative of Glenn Puit's original article. Thereafter, journalist Glenn Puit was notified about the change. After learning of the change, Glenn Puit contacted ED MAGEDSON directly to protest the issue. Shortly thereafter, ED MAGEDSON or an agent of RIPOFF REPORT deleted the new URL. These facts were memorialized by Michael Roberts in the form of a YouTube "screen cast" video, which clearly establishes both the existence of the unauthorized article and its subsequent deletion.

The evidence suggests that when ED MAGEDSON learned of this YouTube video, he or one of RIPOFF REPORT's agents restored the deleted page so that it would not result in an error message displaying the phrase "The resource you are looking for has been removed, had its name changed, or is temporarily unavailable," which is what was displayed after ED MAGEDSON deleted the original article and had the original URL redirect to the new unauthorized version.

This change of URL and redirection provision is evidenced by Glenn Puit's RIPOFF

REPORT complaint No. 828918, which still references the old URL with the following quote: "To read my second story on this matter that delves into allegations of computer hacking, please go to <http://www.ripoffreport.com/business-consultants/google-cide-the-full/google-cide-the-full-story-b3660.htm>"

**The aforementioned changes to Glenn Puit's initial RIPOFF REPORT effectively thrust Michael Roberts into the role DARREN MEADE played in his and ADAM ZUCKERMAN's organization's ongoing criminal enterprise discussed earlier.**

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On May 7, 2013, one day after ED MAGEDSON and DARREN MEADE accessed and viewed the link to Michael Roberts' YouTube screencast, which proved ED MAGEDSON or another RIPOFF REPORT agent removed and republished an amended RIPOFF REPORT complaint, ANNA RICHTER told TRACEY RICHTER that SCA Smith was attempting to intimidate DARREN MEADE by going through ED MAGEDSON. TRACEY RICHTER told ANNA RICHTER that DARREN MEADE needed to send "stuff."

On May 17, 2013, an e-mail containing a "non-indexed" link accessing a copy of DARREN MEADE's February 28, 2011, e-mail to MATTHEW COOKE, in which DARREN MEADE sought to enforce his purported right to acquire the exclusive rights to the highly illegal hacking technology that he and ADAM ZUCKERMAN used to remove RIPOFF REPORT complaints for profit. ED MAGEDSON accessed and viewed this e-mail and then forwarded the same to DARREN MEADE who also accessed and viewed it. This e-mail communication provided ED MAGEDSON unimpeachable evidence that in 2011 his / RIPOFF REPORT employee and BFF, DARREN MEADE, tried to purchase the very hacking technology DARREN MEADE told ED MAGEDSON and the FBI was used to hack RIPOFF REPORT's servers and remove RIPOFF REPORT complaints.

On May 28, 2013, an e-mail containing a "non-indexed" link accessing a copy of a February 20, 2011, e-mail message from DARREN MEADE to convicted felon ADAM ZUCKERMAN was sent to ED MAGEDSON, who accessed and viewed it and then forwarded the same to DARREN MEADE, who also accessed and viewed it. In this e-mail, which DARREN MEADE gave the subject heading, "Conspiracy Theory Gone Wild," DARREN MEADE suggested he and ADAM ZUCKERMAN's organization begin publicly accusing Michael Roberts of being criminally responsible for Dustin Wehde's murder (i.e., Michael Roberts hired Dustin Wehde to murder TRACEY RICHTER, which resulted in TRACEY RICHTER defending herself by shooting Dustin Wehde nine times and killing him) to "pressure" and intimidate Michael Roberts into handing his business over to DARREN MEADE and ADAM

ZUCKERMAN. Towards the end of his e-mail to convicted felon ADAM ZUCKERMAN, DARREN MEADE suggested that he and ADAM ZUCKERMAN get together to devise how to "play this card" against Michael Roberts. DARREN MEADE sent this e-mail to ADAM ZUCKERMAN around the same time DARREN MEADE, TRACEY RICHTER, ANNA RICHTER, and RUSSELL SCHERTZ alleged DARREN MEADE provided Iowa law enforcement with information implicating Michael Roberts in Dustin Wehde's murder. The information contained in this e-mail, which computer forensics proved was viewed by ED MAGEDSON, is contrary to that contained in almost all of ED MAGEDSON's, DARREN MEADE's, and the anonymous authors' RIPOFF REPORT complaints about Michael Roberts and the State's witnesses, and also contrary to DARREN MEADE's deposition, which, as discussed above, ED MAGEDSON / RIPOFF REPORT and at least one of RIPOFF REPORT's attorney were well aware of as early as January 2012.

On June 6, 2013, ANNA RICHTER told TRACEY RICHTER that DARREN MEADE wanted TRACEY RICHTER to provide him with the location of sensitive, embarrassing information concerning a family member of one of Michael Roberts' former employees. DARREN MEADE subsequently posted this information on RIPOFF REPORT. ANNA RICHTER also said DARREN MEADE had sent her (ANNA RICHTER) some information / documents, but that she would discuss it with TRACEY RICHTER in person during their next prison visit. ANNA RICHTER also told TRACEY RICHTER that in his Motion to Quash, SCA Smith was "moaning" that "they" had given information / documents to DARREN MEADE. TRACEY RICHTER said most of the information ANNA RICHTER had given to DARREN MEADE was given to her (TRACEY RICHTER) during her murder prosecution. ANNA RICHTER said most of the information DARREN MEADE obtained was from the internet, and sometimes DARREN MEADE asked her for information about which she knew nothing.

On July 4, 2013, DARREN MEADE published a video titled "Michael Roberts REXXfield RIPOFF REPORT Google 60 Minutes Australia". Therein, DARREN MEADE asserted Michael Roberts' custody battle was a hoax, that Michael Roberts orchestrated the "home invasion," which resulted in Dustin Wehde's murder, and that Michael Roberts "confessed the real motive" of the home invasion to DARREN MEADE once upon a time.

On June 13, 2013 (or June 6, 2013), ANNA RICHTER told TRACEY RICHTER that ED MAGEDSON received a copy of SCA Smith's Motion to Quash, and that ED MAGEDSON forwarded the same to DARREN MEADE. TRACEY RICHTER told ANNA RICHTER "they" had proof SCA Smith obtained the transcripts from DARREN MEADE's aforementioned deposition, and that SCA Smith cannot use the power of his office to do this. TRACEY RICHTER continued, stating neither "they" nor DARREN MEADE had done anything criminal, and SCA Smith was attacking DARREN MEADE for merely exercising his First



Amendment rights. Amazingly, however, TRACEY RICHTER then said SCA Smith could have an actionable civil defamation claim against ED MAGEDSON / RIPOFF REPORT and / or DARREN MEADE, but neither of ED MAGEDSON / RIPOFF REPORT and / or DARREN MEADE had done anything actionable in the criminal sense.

On June 29, 2013, DARREN MEADE sent the following e-mail to ANNA RICHTER:

Everyone, I have had enough of all the threats from Michael Roberts and Ben Smith. Every three-four days I will be releasing video's showing the true character of Michael and Benjamin. I hope the tone of the first video is not offensive to anyone. I plan to release one on Ben by Monday morning. I never made a video presentation in my life therefore I know the video maybe lacking a bit. Here is a link to the first video:  
<http://www.screencast.com/t/AqLqBnFcL>

On July 2, 2013, TRACEY RICHTER told ANNA RICHTER to give certain documents to "you know who." ANNA RICHTER stated she already had given them to him. [The context of this conversation suggests DARREN MEADE is the unnamed individual] ANNA RICHTER then stated she located documents about Mona Wehde, the murder victim's mother, and Dr. John Pitman, both of whom were State's witnesses. TRACEY RICHTER directed ANNA RICHTER to give the information to this unnamed individual.

On July 11, 2013, after receiving the transcript of SCA Smith's testimony from her and Michael Roberts' custody proceedings, which, much to their dismay, proved SCA Smith did not commit perjury as TRACEY RICHTER, ANNA RICHTER, DARREN MEADE and ED MAGEDSON / RIPOFF REPORT had been alleging on RIPOFF REPORT, TRACEY RICHTER told ANNA RICHTER that she still believed SCA Smith committed perjury. ANNA RICHTER told TRACEY RICHTER that the court reporter who reported the proceedings was "dirty."

On July 18, 2013, ANNA RICHTER played DARREN MEADE's July 4, 2013, video presentation, which is mentioned above, over the phone for TRACEY RICHTER. After listening to the video, TRACEY RICHTER commented that DARREN MEADE did not do a bad job with the video presentation and that he would get better.

On July 25, 2013, TRACEY RICHTER asked ANNA RICHTER whether there was any new information, documents, or material [on RIPOFF REPORT]. ANNA RICHTER stated there was one thing online that was new, but that she wanted to wait and discuss it with TRACEY RICHTER during their next visit at the prison because "they" might be listening to TRACEY RICHTER's phone calls.

On July 27, 2013, TRACEY RICHTER told BERT PITMAN to create a YouTube channel for ANNA RICHTER. TRACEY RICHTER said that YouTube shows up pretty high in internet

search results. BERT PITMAN told TRACEY RICHTER he wanted nothing to do with Dr. John Pitman. TRACEY RICHTER told BERT PITMAN to **"keep his eye on the prize."**

On July 30, 2013, ANNA RICHTER told TRACEY RICHTER that she got a preview of "another thing" that DARREN MEADE told ANNA RICHTER was going to be published on the internet. ANNA RICHTER said she wrote [DARREN MEADE] back and told him the proposed video content was good. TRACEY RICHTER said some of the State's witnesses lied when they testified against her. ANNA RICHTER said they need to go after the State's witnesses because they lied on the witness stand. ANNA RICHTER said they were going to prove State's witnesses Mary Higgins and Mona Wehde committed perjury when they testified against TRACEY RICHTER. TRACEY RICHTER told ANNA RICHTER they needed an affidavit from "the woman" who alleged Dr. John Pitman lied on the witness stand.

On August 11, 2013 at 12:18 p.m. PST, DARREN MEADE left the following voicemail for Daniel Danino (dba OC PC Services):

Hi Daniel, my name is Darren, I'm in Huntington Beach, I have a laptop that is not working and I needed to get it fixed today, Sunday. Can you please let me know if you have anytime today to work on a laptop. Again, I'm in Huntington Beach. My cellphone number is (949) 357-6193 again. That's (949) 357-6193. Thank you.

After this, DARREN MEADE paid OC PC Services \$90.00 for computer maintenance services. DARREN MEADE gave Daniel Danino the address of 711 Pacific Coast Hwy, Huntington Beach, California, to attend to the repairs. The repairs needed more work, Daniel Danino took the laptop back to his office. DARREN MEADE did not pick up his computer.

On August 22, 2013, ANNA RICHTER told TRACEY RICHTER she believed that Michael Roberts lied on his immigration paperwork from 1996. TRACEY RICHTER asked ANNA RICHTER whether she had sent this information to "somebody else." ANNA RICHTER stated she was not sure, but that she would fax it over to "that person." TRACEY RICHTER asked whether she sent that document to "that someone else." ANNA RICHTER stated "they never checked on the alibi of you know who."

On August 28, 2013, Ripoffreport.com complaint No. 1079952 was published about Daniel Isaac Danino (dba OC PC Services), and his mother Roberta Danino. Said complaint accuses them of crimes, mental health issues, and other derogatory / criminal conduct. Additional demeaning comments and photos of these victims were added to this RIPOFF REPORT complaint on August 29, 2013, September 3, 2013, September 05, 2013, and September 7, 2013

On August 29, 2013, Dr. John Pitman's office received a call from a male who identified himself as Ryan. Ryan informed Dr. John Pitman's administrative assistant, Tina Allen, that he worked for RIPOFF REPORT and, for \$10,000, could remove all the derogatory complaints on RIPOFF REPORT about Dr. John Pitman, including the RIPOFF REPORT complaints DARREN MEADE has admitted to authoring and publishing on RIPOFF REPORT. On May 19, 2014, RIPOFF REPORT / XCENTRIC VENTURES wrote a check to a RYAN DUCA. Tina Allen memorialized the substance of this conversation in an affidavit and provided the same to SCA Smith.

On September 4, 2013, ANNA RICHTER told TRACEY RICHTER that Dr. John Pitman would rather spend money on a prostitute / stripper than care for [his son, BERT PITMAN]."

On September 4, 2013, another RIPOFF REPORT complaint about Daniel Danino and Roberta Danino (dba OC PC Services) was published. This complaint alleged Daniel Danino committed various crimes. The report was later augmented with additional comments, photos of the victims, and criminal allegations on September 13, 2013, September 21, 2013 and October 17, 2013.

Between September 5, 2013, and September 13, 2013, DARREN MEADE transmitted hundreds of phone calls and text messages to Daniel Danino's mobile phone.

On September 5, 2013 (9:39 a.m.), SIAMACK YAGHOBI (Siamack.Yaghobi@gmail.com) pitched the following in a RIPOFF REPORT CAP / VP sales e-mail to a prospective RIPOFF REPORT CAP customer (RIPOFF REPORT victim / subject), and copied in ED MAGEDSON / RIPOFF REPORT (EDitor@ripoffreport.com) on the e-mail as well:

We see you have complaints on [www.pissedconsumer.com]. if, [sic] for some reason they come before Ripoff Report on a search...[sic] and the business (like yours) is a member of one of our programs, at our request, they should be removing it at our request. Why? .. this [sic] was part of an out of court [sic] settlement when Ripoff Report caught them stealing thousands of Reports.

On September 5, 2013 (7:25 p.m.), ED MAGEDSON (EDitor@ripoffreport.com) sent the following reply to SIAMACK YAGHOBI (Siamack.Yaghobi@gmail.com): "You need to REMOVE the paragraph I have in Yellow [sic] highlight if there are no Reports on them on [www.pissedconsumer.com]!!!"

RIPOFF REPORT sued Opinion Corp (dba Pissed Consumer / www.pissedconsumer) on October 7, 2008, In the United States District Court of Arizona (Case No. 2:08-CV-01841-JAT). In its complaint, RIPOFF REPORT referred to Pissed Consumer as its direct competitor). It appears that on or around December 8, 2008, the parties (RIPOFF REPORT and Pissed Consumer) entered into a settlement agreement, which enjoined Pissed Consumer from stealing or "scraping" and publishing RIPOFF REPORT complaints on

Pissed Consumer's website (www.pissedconsumer.com) and dismissed RIPOFF REPORT's complaint, which asked for hundreds of thousands of dollars in damages and attorneys' fees, with prejudice.

Evidence obtained by law enforcement demonstrates that Pissed Consumer complaints concerning RIPOFF REPORT employees and / or individuals who were / are not RIPOFF REPORT CAP or VP members, were removed by Pissed Consumer (again, RIPOFF REPORT's direct competitor) at ED MAGEDSON's / RIPOFF REPORT's direction, assumedly pursuant to this settlement agreement.

On September 12, 2013, another RIPOFF REPORT complaint about Daniel Danino and Roberta Danino (dba OC PC Services), was published. This complaint / article accuses Daniel Danino, the company's owner, and his family of sex offenses, scams, lewd behavior, robbery, and the rape of a female student. Subsequent to this RIPOFF REPORT complaint, Daniel Danino demanded that DARREN MEADE remove the aforementioned Ripoffreport.com complaints. DARREN MEADE responded by demanding a fee of \$7,000.00 for the removal of the Ripoffreport.com pages, and for compensation for DARREN MEADE's laptop, which DARREN MEADE had never retrieved. Daniel Danino agreed only to a refund DARREN MEADE's \$90.00 and return the laptop, which he would hold until DARREN MEADE deleted the aforementioned defamatory RIPOFF REPORT complaints.

On September 17, 2013, SIAMACK YAGHOBI wrote the following in an email to a prospective RIPOFF REPORT customer (victim), which he blind copied to ED MAGEDSON / RIPOFF REPORT: "We work extremely closely with Google and occasionally our list of links don't work because Google consistently changes their 'search links.'" Minutes later, ED MAGEDSON wrote the following to SIAMACK YAGHOBI in response:

We don't work closely with Google!!!! Don't ever say that!!!!!! See, what that is, is, ...  
**GOOGLE CHANGES THEIR ALGORITHMS ALL THE TIME.. BUT, RIPOFF REPORT STILL STAYS AT THE TOP OF THE SEARCH ENGINES.** Never say we are in good with Google. Search engines know us for over 16 years now – and consider us a good source of information for consumers.

SIAMACK YAGHOBI wrote the following in response to ED MAGEDSON's admonishment: "10-4 boss."

On September 25, 2013, RIPOFF REPORT filed a lawsuit against Michael Roberts and his business entities. The case was filed in the Superior Court of Arizona, County of Maricopa [Case No. CV2013-012936]. In its complaint, RIPOFF REPORT alleged Michael Roberts had wrongfully / tortuously interfered with RIPOFF REPORT business' interests. Specifically, RIPOFF REPORT alleged that the boycott of RIPOFF REPORT lead and

organized by Michael Roberts through Michael Roberts' websites authorizedstatement.org and badforpeople.com, which efforts Michael Roberts has asserted were in response to the defamatory attacks against himself and others. Later, on or around November 18, 2013, following the hearing on RIPOFF REPORT's request to enjoin Michael Roberts' boycott, the Court found that everything in AuthorizedStatement.org and BadForPeople.com was protected speech" and denied RIPOFF REPORT's request for a preliminary injunction. Your applicant was informed that RIPOFF REPORT introduced evidence in these proceedings that demonstrated Michael Roberts' boycott negatively impacted RIPOFF REPORT's advertising revenue.

On September 26, 2013, ANNA RICHTER told TRACEY RICHTER that ED MAGEDSON filed a lawsuit against Michael Roberts. TRACEY RICHTER stated she cannot imagine ED MAGEDSON would be intimidated by Michael Roberts. ANNA RICHTER said Michael Roberts had made ED MAGEDSON angry.

On September 30, 2013, ANNA RICHTER told TRACEY RICHTER she was waiting for information and / or documents from DARREN MEADE, but that DARREN MEADE had been busy the last couple days helping RIPOFF REPORT owner ED MAGEDSON prepare for his civil action against Michael Roberts. ANNA RICHTER said ED MAGEDSON is going after Michael Roberts for extortion, and is taking out a protective order against Michael Roberts and SCA Smith because the two were harassing him (ED MAGEDSON). ANNA RICHTER said she found a document TRACEY RICHTER had asked her to find while she was searching for documents / information for ED MAGEDSON. TRACEY RICHTER said she had something to tell ANNA RICHTER about ED MAGEDSON, and that ED MAGEDSON had a bunch of stuff on Michael Roberts. ANNA RICHTER said she was supposed to get information to ED MAGEDSON and DARREN MEADE about Michael Roberts. ANNA RICHTER said DARREN MEADE told her he had to work on ED MAGEDSON's case first, but when he finished with that, he would go back to working for TRACEY RICHTER and ANNA RICHTER's cause. ANNA RICHTER said that when "WE" put stuff on RIPOFF REPORT "WE" provide documentation.

On September 30, 2013, TRACEY RICHTER directed ANNA RICHTER to perform certain tasks on TRACEY RICHTER's or ANNA RICHTER's computer in real-time. ANNA RICHTER said ED MAGEDSON and / or DARREN MEADE wanted her to ask TRACEY RICHTER whether she (TRACEY RICHTER) was familiar with an individual ANNA RICHTER named. ANNA RICHTER and TRACEY RICHTER both stated that Mona Wehde, the mother of the boy Tracey murdered, was once involved with Michael Roberts and drug dealers from Sioux City, Iowa.

On October 1, 2013, DARREN MEADE published RIPOFF REPORT complaint No.

1088535, which contained defamatory statements about State's witness Michael Roberts and his wife Dr. Heidi Roberts (aka Heidi Forsbacka). The title of DARREN MEADE's RIPOFF REPORT complaint here is as follows:

AUTHORIZED STATEMENT, BAD FOR PEOPLE, MICHAEL ROBERTS REXXFIELD, SCAM GROUP, RIPOFF SCAM TO ED MAGEDSON RIPOFF REPORT, SAC COUNTY ATTORNEY BEN SMITH, 60 MINUTES AUSTRALIA, **HEIDI ROBERTS**, JANICE DUFFY CHECK BOOK JOURNALISM, DIGITAL ASSASSINS, RIPOFF, CHECKBOOK JOURNALISM, PROSECUTORIAL MISCONDUCT, NINEMSN FRAUD, GOLD COAST

On October 3, 2013, ANNA RICHTER told TRACEY RICHTER she (or they) had obtained e-mail communications between Michael Roberts and his wife, Heidi Forsbacka. Michael Roberts told law enforcement that no one other than he or his wife should have copies of correspondence between him and his wife.

On October 10, 2013, ANNA RICHTER told TRACEY RICHTER that DARREN MEADE had recently sent her information. TRACEY RICHTER told ANNA RICHTER "thank God [DARREN MEADE] is involved." ANNA RICHTER relayed a question from DARREN MEADE to TRACEY RICHTER about State's witness Mona Wehde.

On October 13, 2013, ANNA RICHTER told TRACEY RICHTER that ED MAGEDSON asked ANNA RICHTER to tell TRACEY RICHTER to report the results of her custody / child support proceeding with Michael Roberts, back to ANNA RICHTER, so that ANNA RICHTER could relay the same to ED MAGEDSON. TRACEY RICHTER asked ANNA RICHTER whether "there was anyone else who wanted her lawyer to ask a specific question of Michael Roberts while he was under oath." ANNA RICHTER said she had already discussed this possibility with TRACEY RICHTER's fiancé, RUSSELL SCHERTZ.

On October 15, 2013, SIAMACK YAGHOBI (siamack.yaghabi@gmail.com) wrote the following in an e-mail to his "boss," ED MAGEDSON / RIPOFF REPORT (EDitor@ripoffreport.com): "Would you consider creating a **sam@ripoffreport.com** email address? Do u agree it to enhance professionalism, and [great] results on hearing back from prospects?"

On October 17, 2013, ANNA RICHTER told TRACEY RICHTER she found out that Michael Roberts had never been an FBI informant. TRACEY RICHTER asked whether they could get tangible proof that Michael Roberts had never been an FBI informant. ANNA RICHTER said the information was from a "very reliable source," and she would get more information about this once "she [got] some other stuff back." Later, ANNA RICHTER said the information came from an FBI SA. ANNA RICHTER said ED MAGEDSON wanted TRACEY RICHTER to report the outcome of her custody hearing to ANNA RICHTER, so that ANNA RICHTER could relay the same to ED MAGEDSON. ANNA RICHTER said ED

MAGEDSON had given her documents to give to TRACEY RICHTER, and that she would be sending them to TRACEY RICHTER. TRACEY RICHTER said "someone" had been trying to contact ANNA RICHTER, but that this "someone" must not have ANNA RICHTER's correct e-mail address. TRACEY RICHTER said she would have her fiancé, RUSSELL SCHERTZ, check with this "someone" tomorrow to see if the "someone" had ANNA RICHTER's correct contact information. TRACEY RICHTER said ANNA RICHTER knew this "someone."

On October 18, 2013, TRACEY RICHTER told ANNA RICHTER to tell ED MAGEDSON that Michael Roberts was served with that "thing" (ED MAGEDSON's / RIPOFF REPORT lawsuit against Michael Roberts) when he appeared at the Buena Vista County Courthouse for their hearing on the contempt / child support matters.

On October 19, 2013, ED MAGEDSON / RIPOFF REPORT issued SIAMACK YAGHOBI the following e-mail address: sam@ripoffreport.com

On Sunday, October 20, 2013, 9:15 p.m. PST, SIAMACK YAGHOBI sent an e-mail from siamack.yaghobi@gmail.com to ED MAGEDSON's e-mail address Editor@ripoffreport.com, with the subject heading "OC PC contact#" and message body that simply read: "Daniel Danino 714-869-####" Approximately 10 minutes later, (9:26 p.m. PST), ED MAGEDSON replied from Editor@ripoffreport.com: "You would text this to me once you are maybe on your way in that area – if you said, ED< I am about 1 or 2 hours away – check to see if he will be there.. I will do that." ED MAGEDSON's above-reply proves he was an active principal in this scheme to extort Danino. Ten minutes later, SIAMACK YAGHOBI acknowledged Magedson's e-mail instructions with a simple e-mail reply: "Ok sounds good"

On October 21, 2013, at 1:19:15 p.m. PST, SIAMACK YAGHOBI initiated a call from cell phone number (949) 600-0673 to Daniel Danino's mobile phone, which is (714) 869-1660. According to Daniel Danino, the pretext for this call was that SAM YOUNBANKS, needed to give multiple laptops to Daniel Danino for repair. Daniel Danino did not know at the time SIAMACK YAGHOBI was associated with DARREN MEADE. This same day, sometime after 1:00 p.m. PST, SIAMACK YAGHOBI arrived at Daniel Danino's gated estate without any computers for repair and identified himself to Daniel Danino as "SAM YOUNBANKS." SIAMACK YAGHOBI revealed that he was a business partner of DARREN MEADE and was there to collect DARREN MEADE's laptop. Daniel Danino told SIAMACK YAGHOBI he needed the three above-mentioned RIPOFF REPORT complaints / articles concerning Danino's family and business removed. SIAMACK YAGHOBI then made a call to an unknown person. After that, SIAMACK YAGHOBI told Daniel Danino that the three RIPOFF REPORT complaints about Daniel Danino, his family, and business had been removed. Daniel Danino checked RIPOFF REPORT for these three complaints, and after observing

they had in fact been removed, Daniel Danino gave SIAMACK YAGHOBI DARREN MEADE's laptop computer.

On October 21, 2013 at 2:00:15 P.M. PST, SIAMACK YAGHOBI initiated a call from cell phone number (949) 600-0673 to (714) 869-1660 which belongs to Daniel Danino, the call lasted 29 seconds. On October 21, 2013 at 2:00:56 P.M. PST, SIAMACK YAGHOBI initiated a call from cell phone number (949) 600-0673 to (602) 518-4357 which belongs to ED MAGEDSON, the call lasted 24 seconds.

On October 21, 2013 at 2:04:57 P.M. PST, SIAMACK YAGHOBI initiated a call from cell phone number (949) 600-0673 to 714-869-1660 which belongs to Daniel Danino, the call lasted 28 seconds.

On October 21, 2013 at 2:04:57 P.M. PST, ED MAGEDSON initiated a call from his Leap Wireless cell phone number (602) 518-4357 to SIAMACK YAGHOBI's Metro PCS cell phone number, (949) 600-0673. This call lasted 4 minutes 45 seconds.

On October 21, 2013 at 2:28:29 P.M. PST, SIAMACK YAGHOBI initiated a call from his Metro PCS cell phone number (949) 600-0673 to (602) 518-4357, which belongs to ED MAGEDSON. This call lasted 39 seconds.

On October 21, 2013 at 2:36:50 P.M. PST, SIAMACK YAGHOBI initiated a call from his Metro PCS cell phone number (949) 600-0673 to ED MAGEDSON's phone, (602) 518-4357. This call lasted 1:57 minutes.

On October 21, 2013 at 3:02:15 P.M. PST, ED MAGEDSON initiated a call from his Leap Wireless cell phone number 6025184357 to (949) 600-0673 which belongs to SIAMACK YAGHOBI, the call lasted 6 minutes 38 seconds.


On October 21, 2013, RIPOFF REPORT deleted the three defamatory pages (complaints Nos. 1079952, 1081741 and 1084023). The removal of these complaints were carried out, presumably, at the direction of ED MAGEDSON in an attempt to coerce Daniel Danino into complying with DARREN MEADE's extortion demands.

On October 21, 2013, there were seven calls and eight text messages between DARREN MEADE's cell phone (949) 357-6193 and ED MAGEDSON's cell phone (602) 518-4357

Later, on Oct 21 2013, after SIAMACK YAGHOBI retrieved DARREN MEADE's computer from Danino, and after SIAMACK YAGHOBI and ED MAGEDSON had exchanged phone calls, the three aforementioned RIPOFF REPORT complaints concerning Daniel Danino and his family were republished as follows: complaints No. 1084023 at 04:42 P.M. (UTC-07:00), complaints No. 1081741 at 07:25 P.M. (UTC-07:00) and complaints No. 1079952 at 10:40 P.M. (UTC-07:00)



On October 24, 2013, ANNA RICHTER told TRACEY RICHTER she was not certain whether anything came out during the contempt proceedings that would be helpful to ED MAGEDSON. ANNA RICHTER said TRACEY RICHTER's custody / child support attorney gave ANNA RICHTER permission for ED MAGEDSON to call the attorney on his mobile phone. TRACEY RICHTER directed ANNA RICHTER to get certain information from ED MAGEDSON about Michael Roberts.

On October 25, 2013, ED MAGEDSON (EDitor@ripoffreport.com) directed SIAMACK YAGHOBI to make a "sales" call to (757) 232-5580, which is the phone number of **Dr. John Pitman's** plastic surgery practice in Virginia. 

On October 28, 2013, in response to SIAMACK YAGHOBI's request for ED MAGEDSON to pay SIAMACK YAGHOBI's cell phone bill, **ED MAGEDSON wrote him the following: "[SIAMACK YAGHOBI], Just pay it – I will reimburse you with the \$200 – this week. IF I PAY [YOUR CELL PHONE BILL], IT THEN CONNECTS WITH ME! DON'T WANT THAT!"**

On October 31, 2013, ANNA RICHTER told TRACEY RICHTER she had scanned a number of documents, which she planned to send to "someone." ANNA RICHTER told TRACEY RICHTER she learned Dr. John Pitman was back with a stripper and that Dr. John Pitman lied under oath when he testified in his deposition in TRACEY RICHTER's murder case. ANNA RICHTER said she finally got contact information "on a certain person" from "someone." ANNA RICHTER said she printed off documents concerning another case involving ED MAGEDSON, and that ED MAGEDSON had to remove "something" from RIPOFF REPORT, but that "something" did not have anything to do with TRACEY RICHTER's case and / or DARREN MEADE's and the other RIPOFF REPORT complaint's concerning the State's witnesses.

On November 3, 2013, SIAMACK YAGHOBI wrote the following in an e-mail to a Sarah (**1 stakla@gmail.com**), which he copied to DARREN MEADE: "Hi Sarah, So grateful we met as well as being able to introduce you to [DARREN MEADE]. I'm looking forward to the great fruitfulness to this relationship between all of us, especially in support of and for justice for [TRACEY RICHTER]. Wishing you two a great weekend."

It is important to note that DARREN MEADE testified in his aforementioned deposition that he and Adam Zuckerman hired / recruited freelance writers or bloggers from fiverr.com and other places to "back-link" or "push" defamatory internet stories about Dr. Scott Connelly onto different article directories, which would effectively turn one defamatory article / post about Dr. Scott Connelly, into hundreds. DARREN MEADE also testified that he and Adam Zuckerman hired a number of people to dig up and publish defamatory information about Dr. Scott Connelly and another individual adverse to their criminal organization, with the

intent to “destroy [their businesses and reputations] and make it so [they] were unable to have gainful employment.” The information contained in this affidavit clearly demonstrates that DARREN MEADE and ED MAGEDSON / RIPOFF REPORT are doing the same thing to the State’s witnesses that DARREN MEADE and his and Adam Zuckerman’s criminal organization did to Dr. Scott Connelly in 2010.

On or around November 5, 2013, pursuant to their ongoing divorce proceedings, Dr. John Pitman was served with a request for production of documents by his estranged wife, Lisa Pitman. Numbered paragraph twenty-one of the request asked Dr. John Pitman to produce “each and every letter, e-mail communication, or any other written correspondence of any nature between [Dr. John Pitman] and Michael Roberts from the date of [Dr. John Pitman’s marriage Lisa Pitman] to the current date, omitting nothing.” Dr. John Pitman told SCA Smith he did not have any such evidence to produce, and that neither he nor his attorney could think of any reason why the information described in this interrogatory would be relevant in any way to his and Lisa Pitman’s divorce / custody proceedings.

The information contained in this affidavit demonstrates that TRACEY RICHTER and her friends and family routinely hijack other people’s civil discovery processes to fit her / their own ends and needs. Question No. 21 from the request for production served on Dr. John Pitman appears to be just another example of this. As discussed earlier, TRACEY RICHTER had ANNA RICHTER asked ED MAGEDSON whether ED MAGEDSON had any questions TRACEY RICHTER’s custody / child support attorney should ask Michael Roberts. At the time TRACEY RICHTER offered this to ED MAGEDSON, ED MAGEDSON was suing Michael Roberts in Arizona. On February 8, 2014, during a prison visit, ANNA RICHTER told TRACEY RICHTER that ED MAGEDSON had been after ANNA RICHTER to do something, and that ED MAGEDSON (or his attorney) had e-mailed TRACEY RICHTER’s attorney to see if there was a way TRACEY RICHTER’s attorney could obtain Michael Roberts’s mental health therapist’s confidential notes / reports made during / following Michael Roberts’ therapy session from 2003 and 2004. TRACEY RICHTER told ANNA RICHTER to have her custody / child support attorney to subpoena Michael Roberts’ confidential therapy notes and tell said attorney it is related to the custody stuff. ANNA RICHTER told TRACEY RICHTER that getting Michael Roberts’ confidential therapy notes / reports to ED MAGEDSON would “really help [ED MAGEDSON] in his lawsuit against Michael Roberts.” Later, during a prison visit between TRACEY RICHTER and ANNA RICHTER on February 28, 2014, ANNA RICHTER said ED MAGEDSON’s attorney and one of TRACEY RICHTER’s PCR attorneys were communicating for the purpose of sharing / obtaining information about Michael Roberts. Another example, as discussed above, on March 9, 2014, TRACEY RICHTER directed ANNA RICHTER to give ED MAGEDSON a list of the information ED MAGEDSON should request of Michael Roberts in their civil case in

Arizona about Michael Roberts's wife, Heidi Forsbacka (aka Heidi Roberts). TRACEY RICHTER told ANNA RICHTER that Michael Roberts might "back off" if ED MAGEDSON requested certain information from Michael Roberts about his wife. In fact, Darren Meade's 2012 and 2013 bank records are chock-full of payments to [www.fiverr.com](http://www.fiverr.com).

On November 11, 2013, Dr. John Pitman's administrative assistant, Tina Allen, received a call at Dr. John Pitman's medical practice from a male who identified himself as RIPOFF REPORT employee "SAM YOUBANKS." Tina Allen said SAM YOUBANKS advised that [Dr. John Pitman] could get the derogatory information published about him on RIPOFF REPORT removed with an initial down payment and the remaining amount billed after it was taken down. Tina Allen said SAM YOUBANKS advised there would also be a monthly fee to continue to monitor RIPOFF REPORT for any new additional derogatory information published on it concerning Dr. John Pitman. SAM YOUBANKS provided Tina Allen the following contact information: e-mail: [sam@ripoffreport.com](mailto:sam@ripoffreport.com) and mobile phone No. (949) 600-0673 (Metro PCS), which is (disposable) sold / serviced by Metro PCS. As noted earlier, ED MAGEDSON / RIPOFF REPORT issued the e-mail [sam@ripoffreport.com](mailto:sam@ripoffreport.com) to SIAMACK YAGHOBI.

On November 21, 2013, ANNA RICHTER told TRACEY RICHTER to remind her to tell TRACEY RICHTER something the next time she visited the prison, because she did not want to discuss it over the phone. ANNA RICHTER discussed giving information to ED MAGEDSON and / or DARREN MEADE.

On November 30, 2013, an individual posing as Dr. John Pitman (with Dr. John Pitman's knowledge and permission) using [jmpitman@yahoo.com](mailto:jmpitman@yahoo.com), sent SAM YOUBANKS the following e-mail to the e-mail address SAM YOUBANKS provided Tina Allen, [sam@ripoffreport.com](mailto:sam@ripoffreport.com):

Sam; About 2 weeks ago you spoke with my office manager Tina Allen regarding a proposal to remove the untruthful posts about myself and my former wife that have been placed on the RIPOFF REPORT for quite some time. She was expecting to hear back from you by e-mail regarding the specifics of your proposal and provided you her e-mail address but as of last Weds she has not heard back from you. Would you please e-mail me the details of the service or provide a convenient time and phone number to reach out to you directly. Your response would be appreciated. Thank you JM Pitman, M.D.

On November 30, 2013, SAM YOUBANKS ([sam@ripoffreport.com](mailto:sam@ripoffreport.com)) replied to ([jmpitmanmd@yahoo.com](mailto:jmpitmanmd@yahoo.com)):

First and foremost, we do not and have not removed reports for our entire tenure of over 16 years in business...and I have never stated such a 'proposal' what so ever...what I told Tina is that what we do within our Corporate Advocacy Program is much better and if the report

writer cannot provide legitimate proof of the written allegations then we will go about exposing and redacting false statement/s. First watch this quick video that goes into detail about the services we offer within our program:

On December 1, 2013, (jmpitmanmd@yahoo.com) responded to SAM YOUBANKS (sam@ripoffreport.com):

Thank you for your reply and clarification. I am going to discuss this with Tina when she returns to the office this week. I could be mistaken but I am quite sure that she said that the reports could be removed for a fee of \$10,000.00 paid in 2 installments, one initial payment and then final payment when the reports were removed. I will get back to you afterwards.

On December 1, 2013, SAM YOUBANKS (sam@ripoffreport.com) responded to (jmpitmanmd@yahoo.com) and copied in ED MAGEDSON (Editor@ripoffreport.com):

Your welcome, Dr., I am glad to have cleared things up for you. There's nothing worse than miscommunication errors in business, especially when fellow professionals misquote another professional. I'm sure Tina is just been busy and/or juggling a lot of thoughts and that could have been the premise to leading her to share such a ridiculous statement that would never come from any of our companies' representatives and I'm sorry for the confusion. This is truly the ultimate opportunity for you to repair and restore your reputation the right way, Dr. and show consumers that you are a business they can trust because you have made a commitment to customer satisfaction unto us. I hope you have taken the time to review the information I sent to you and learn about the invaluable services we are offering members of the Corporate Advocacy Business Remediation and Customer Satisfaction Program.

On December 5, 2013, (jmpitmanmd@yahoo.com) e-mailed the following message to SAM YOUBANKS (sam@ripoffreport.com):

I have reviewed the materials you sent to me and have asked Tina to follow up by filling out the application so that this process can be completed as soon as possible. The slander contained in these reports has had a significant negative financial impact on my practice and I would be most appreciative if your process could be expedited. Tina has told me that she has some questions regarding portions of the application and would like to speak with you to resolve these items so that the application need not be corrected due to any errors or omissions. She will be in the office tomorrow from 10 am-3 pm EST. Could you give her a call at 757-229-5200 so that she can get the application completed and off to you before the weekend.

On December 6, 2013, SAM YOUBANKS called Dr. John Pitman's medical practice and spoke with Dr. John Pitman's administrative assistant, Tina Allen. The conversation was recorded. SAM YOUBANKS told Tina Allen once Dr. John Pitman paid RIPOFF REPORT, RIPOFF REPORT would give Dr. John Pitman the true identities of the individuals who authored the anonymous defamatory RIPOFF REPORT complaints about him. Specifically,

SAM YOUNBANKS told Tina Allen that once a RIPOFF REPORT victim pays RIPOFF REPORT for its Corporate Advocacy Program's (CAP) services, RIPOFF REPORT sends out a letter to the original author, and if the original author does not respond to the letter, then RIPOFF REPORT gives the author's IP address to the victim. SAM YOUNBANKS told Tina Allen that his Metro PCS phone was a "separate phone solely dedicated to our members."

On December 7, 2013, (jmpitmanmd@yahoo.com) e-mailed SAM YOUNBANKS (sam@ripoffreport.com) the following:

I have been reviewing the application Tina has prepared after your conversation yesterday and I remain somewhat confused about the requirement for a monthly fee over a 3 year time frame. Can you explain in more detail why this monthly charge is necessary if in fact your methods are so effective in off setting the slander? I have been continuously receiving unsolicited proposals from a variety of companies (see example below) claiming that they can actually remove the negative reports from the RipOffReport.com. This company even states that they will guarantee the result. Are you aware of these e-mail campaigns? How are these companies getting my personal e-mail contacts? I am going to contact this company on Monday and see if I can get "Hector" to e-mail me a written proposal (stating the guarantee). I will forward you any response that I receive back from him.

On December 7, 2013, SAM YOUNBANKS responded to the above-e-mail from (jmpitmanmd@yahoo.com):

You need to first fill out the application. NOT every business is accepted to the CAP program. Once you've filled that information out, I will be forwarding it to RIPOFF REPORT's main office. Then you can pose those questions to RIPOFF REPORT. I am just an independent sales person selling the CAP program part time while I go to school. Once you've filled out the application, I will forward that to the main office.

On December 13, 2013, RIPOFF REPORT announced that it had offered a \$25,000 reward for information leading to the exoneration of TRACEY RICHTER.

On February 1, 2014, during a prison visit between TRACEY RICHTER and her fiancé, RUSSELL SCHERTZ, said "there is some other thing about BERT PITMAN [your mom, ANNA RICHTER] didn't want to tell you over the phone." RUSSELL SCHERTZ said "[JOHN RICHTER] thinks that [Lisa Pitman] put the stuff on RIPOFF REPORT." TRACEY RICHTER replied, "Probably. Well, did she or was it [DARREN MEADE]? Because I asked my mom (ANNA RICHTER) if it was [DARREN MEADE]. She (ANNA RICHTER) said, well, [DARREN MEADE] said no, it (was or wasn't him). And she (ANNA RICHTER) said DARREN MEADE admitted to other things to her before." RUSSELL SCHERTZ whispered the name of the person he believed was responsible for the anonymous derogatory / defamatory postings on RIPOFF REPORT about Dr. John Pitman, but, because he lowered

his voice, it is impossible to hear what he said. Then RUSSELL SCHERTZ added "we don't know [for sure]" who published the RIPOFF REPORT complaints about Dr. John Pitman. TRACEY RICHTER then told RUSSELL SCHERTZ "it will be interesting if it comes up in his [divorce proceedings with Lisa Pitman] about him fooling around with hookers and call girls, because that will be – we will be using that in my post-conviction relief." TRACEY RICHTER added "BERT PITMAN informed them that "[Dr. John Pitman] is back together with [the hooker / stripper], but [Dr. John Pitman's] neighbor – I want to say a neighbor told [BERT PITMAN] or was it Courtney told them?" RUSSELL SCHERTZ said "We need to get some information from the secretary or the...business manager before she leaves." TRACEY RICHTER then said " Well, who knows. Maybe we can get information from [Lisa Pitman], because [Lisa Pitman] and [Dr. John Pitman] were together [at the time TRACEY RICHTER has alleged Dr. John Pitman saw pictures / photographs of pink spiral notebook], and if she saw the photos and she knows he had the photos, maybe we can trade something with her that she needs." RUSSELL SCHERTZ said they needed to get information from Dr. John Pitman's secretary and from Lisa Pitman. RUSSELL SCHERTZ and TRACEY RICHTER agreed they needed help and assistance from Lisa Pitman and Dr. John Pitman's secretary to obtain sensitive / personal information about Dr. John Pitman. TRACEY RICHTER said DARREN MEADE admitted to ANNA RICHTER that he had authored / published many of the RIPOFF REPORT complaints about the State's witnesses, but had said he did not author / publish the outrageous RIPOFF REPORT complaints about Dr. John Pitman. TRACEY RICHTER told her mother that "maybe this stuff with Dr. John Pitman could develop into something for our benefit [in the PCR context]." RUSSELL SCHERTZ told TRACEY RICHTER he had stored a great deal of information (based on the information in this affidavit, presumably about TRACEY RICHTER's case / State's witnesses) on his work computer but he recently had it removed from that computer because his employer's (ConAgra Foods, Omaha) IT department forced him to remove it. TRACEY RICHTER told RUSSELL SCHERTZ she had a portable hard drive in a box that was in RUSSELL SCHERTZ's possession he could use to store this information. TRACEY RICHTER told RUSSELL SCHERTZ that "they" were going to go after the juror who had an ankle injury before the trial and wanted off the jury, and that they are going to attack jury members. RUSSELL SCHERTZ said that one of TRACEY RICHTER's new attorneys, Matthew Shimanovsky, said SCA Smith is an idiot.

On February 2, 2014, ANNA RICHTER visited TRACEY RICHTER at the prison. TRACEY RICHTER asked ANNA RICHTER to tell her more about Dr. John Pitman. TRACEY RICHTER told ANNA RICHTER that Dr. John Pitman needed to come clean and tell the truth. TRACEY RICHTER told ANNA RICHTER they already had [witnesses in TRACEY RICHTER's case] come forward and said they were pressured to lie, so Dr. John Pitman did

not need to worry about getting in trouble (for committing perjury). TRACEY RICHTER told ANNA RICHTER to tell BERT PITMAN the following:

[Dr. John Pitman] needs to come clean about everything. I'm not – there's things we do know about, and unless he tells us things we don't know about, I don't trust him. Otherwise [Lisa Pitman] is going to find out everything she needs to know about [Dr. John Pitman's former girlfriend, Allisan Tucker], whore.

ANNA RICHTER said the following in reply:

And then [BERT PITMAN] should tell [Dr. John Pitman] you better come clean, because everything will come out about the stuff we don't know, what they told you...to say, then the information that I got, I don't want to give to [Lisa Pitman].

TRACEY RICHTER then told ANNA RICHTER to have BERT PITMAN tell Dr. John Pitman the following:

And we know you (Dr. John Pitman) were helping [your former girlfriend, Allisan Tucker]. We have got receipts for you (Dr. John Pitman) paying for her dental. We know where here bank accounts are in Florida. We know how you (Dr. John Pitman) were using your business and paying for all her (Allisan Tucker) stuff. Paying for her (Allisan Tucker) airfare, paying for all her video production and everything else. Talk to [BERT PITMAN] let [BERT PITMAN] know that this could be our huge blessing. Because if [Dr. John Pitman] comes forward and admits [law enforcement] pressured him to [lie about not having knowledge of key pieces of evidence]...

A while later, TRACEY RICHTER and ANNA RICHTER had the following discussion:

TRACEY RICHTER: Talk to [BERT PITMAN] because this could be a huge blessing in disguise. That could be a Godsend, Mom (ANNA RICHTER). Sometimes God puts things into play so that we have to seize the opportunity.

ANNA RICHTER: Yeah, but [BERT PITMAN cannot say] anything over the phone to you. And make sure it's all done in person. [BERT PITMAN] can't [talk about this plan] over the phone [because] they listen to your phone calls.

TRACEY RICHTER then directed ANNA RICHTER to have BERT PITMAN give Dr. John Pitman TRACEY RICHTER's word that she "will not get involved" if he (Dr. John Pitman) did the "right thing." ANNA RICHTER said that she would tell BERT PITMAN not to talk about their plan over the phone with TRACEY RICHTER. TRACEY RICHTER added "[BERT PITMAN can tell me over the phone what he knows about Dr. John Pitman] but not about our plan."

Towards the end of their visit, TRACEY RICHTER said her fiancé, RUSSELL SCHERTZ, told her that "[Dr. John Pitman] thinks [Lisa Pitman] posted that stuff about [him on RIPOFF REPORT]. ANNA RICHTER replied "That's what [BERT PITMAN] told me, that [Dr. John

Pitman] asked [BERT PITMAN] if he thinks that [Lisa Pitman] had been posting all that stuff on RIPOFF REPORT.” TRACEY RICHTER said RUSSELL SCHERTZ told her that ANNA RICHTER would tell TRACEY RICHTER more about this during their visit the following day. Then TRACEY RICHTER asked ANNA RICHTER what BERT PITMAN told Dr. John Pitman in response to Dr. John Pitman’s question about whether BERT PITMAN knew who was responsible for the RIPOFF REPORT complaints about him. ANNA RICHTER replied “Oh, I don’t know. [BERT PITMAN] didn’t say. I’m sure he would have said no. Hopefully [BERT PITMAN] has the smarts to say [he did not know who did it].” TRACEY RICHTER then said the following:

You know what, [BERT PITMAN] could – he could tell [Dr. John Pitman], “you know what, we could probably get proof from the people who own RIPOFF REPORT as to who posted it, and you (Dr. John Pitman) will be able to use it in court, but that we are going to need your cooperation on things.

ANNA RICHTER said she believed their “other plan,” giving personal, sensitive information about Dr. John Pitman to Lisa Pitman unless Dr. John Pitman “[cooperated],” was a better plan.

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DR. JOHN PITMAN’S DEPOSITION

As mentioned earlier, TRACEY RICHTER’s first husband, Dr. John Pitman, was listed as a State’s witness in the State’s Trial Information charging TRACEY RICHTER with the first degree murder of Dustin Wehde, which was filed in Sac County District Court Case No. FECR011900 on August 5, 2011.

On October 23, 2011, JOHN RICHTER sent the following Facebook message to BERT PITMAN (his nephew): “once again your [sic] not answering, [sic] call me.” Later that same day, JOHN RICHTER sent the following Facebook message to BERT PITMAN: “call me!”

On October 24, 2011, the State provided defense counsel with a list of its witnesses in the order in which it intended to call them throughout the week. Later that day, around 11:30 p.m., BERT PITMAN sent the following Facebook message to JOHN RICHTER: “took a long time to down load all of them. I’m sending it to ur [sic] e-mail in the next hour.”

On October 25, 2011, at 4:45 a.m., JOHN RICHTER sent the following Facebook message to BERT PITMAN: “I just checked my e-mail [and] they are not there yet, inkedtilldeth@aol.com.”



TRACEY RICHTER's murder trial started later that same morning (October 25, 2011). That evening, at 8:14 p.m., BERT PITMAN sent the following Facebook message to JOHN RICHTER: "I sent them to inkedilldeath on accident. Sending them now." October 25, 2011, BERT PITMAN e-mailed around fifty (50) images of documents that contained personal, sensitive information about Dr. John Pitman and his then-girlfriend, aspiring musician Allisan Tucker, whose stage name was / is Lachesis, to his uncle, JOHN RICHTER. Dr. John Pitman recently told law enforcement the documents shown in these images had to have been removed from Allisan Tucker's handbag without her permission when she was at Dr. John Pitman's residence. The information contained in the documents shown in these images BERT PITMAN sent to JOHN RICHTER is identical to the information TRACEY RICHTER and ANNA RICHTER conspired to give to Dr. John Pitman's wife, Lisa Pitman, if Dr. John Pitman did not "play ball."

On October 27, 2011, Dr. John Pitman took the witness stand and gave testimony against TRACEY RICHTER. Midway through the State's direct examination of Dr. John Pitman, TRACEY RICHTER's criminal defense attorneys made an evidentiary objection, which was overruled. The Court, at the request of TRACEY RICHTER's defense attorneys, gave them permission to depose Dr. John Pitman before he testified any further, adjourned for the day. Around 7:00 p.m. that evening, TRACEY RICHTER's criminal defense attorneys deposed Dr. John Pitman. During the deposition, which lasted only about forty-five (45) minutes, TRACEY RICHTER's criminal defense attorneys questioned Dr. John Pitman about his relationship with Allisan Tucker, his former girlfriend, and asked Dr. John Pitman on multiple occasions throughout the deposition whether Allisan Tucker was a stripper or a prostitute. TRACEY RICHTER's criminal defense attorneys then asked Dr. John Pitman for Allisan Tucker's phone number so they could call her that evening to confirm whether or not she was or had been a stripper / hooker. The next morning, Dr. John Pitman took the witness stand, and finished testifying without ever being asked about Allisan Tucker or whether Allisan Tucker was a stripper or a hooker. TRACEY RICHTER's criminal defense attorneys never spoke with Allisan Tucker.

Information obtained by law enforcement suggests JOHN RICHTER communicated extensively with TRACEY RICHTER's criminal defense attorneys before TRACEY RICHTER's trial started. On August 20, 2011, ANNA RICHTER told TRACEY RICHTER that JOHN RICHTER spoke with her criminal defense attorneys for three hours the day before (August 19, 2011).

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On February 3, 2014, TRACEY RICHTER directed BERT PITMAN to find out what was

going on with Dr. John Pitman and Lisa Pitman's divorce. BERT PITMAN told TRACEY RICHTER that Dr. John Pitman asked him whether Lisa Pitman was responsible for the derogatory postings about him on RIPOFF REPORT. BERT PITMAN told TRACEY RICHTER that he did not tell Dr. John Pitman who was responsible for publishing the complaints. Also during this conversation, TRACEY RICHTER told BERT PITMAN he should have taken her computer.

On February 8, 2014, during a prison visit between TRACEY RICHTER and ANNA RICHTER, TRACEY RICHTER and ANNA RICHTER mentioned, by full name, and discussed the DOT employee who processed TRACEY RICHTER's change of name form in 2010, and who later told law enforcement that TRACEY RICHTER had presented the forged court decree as proof her name had been legally changed. Then, ANNA RICHTER told TRACEY RICHTER that ED MAGEDSON wanted her (TRACEY RICHTER) to give him certain information about Michael Roberts. ANNA RICHTER said ED MAGEDSON had been after her (ANNA RICHTER) [to do or get something]. ANNA RICHTER also said ED MAGEDSON e-mailed his (or TRACEY RICHTER's other attorney), Victoria Ames, about something having to do with TRACEY RICHTER's case. ANNA RICHTER asked TRACEY RICHTER whether TRACEY RICHTER's attorney could compel Michael Roberts's therapist to produce the reports from Michael Roberts' therapy session. ANNA RICHTER or TRACEY RICHTER stated that they would have to tell the doctor / therapist that the report(s) are needed for TRACEY RICHTER's pending civil litigation with Michael Roberts (child support contempt action) [when really they planned to give it to ED MAGEDSON / RIPOFF REPORT for the purposes of publishing it in a RIPOFF REPORT complaint and / or for RIPOFF REPORT to use in its pending litigation against Michael Roberts]. TRACEY RICHTER said they would ask one of TRACEY RICHTER's attorney to subpoena the confidential reports from Michael Roberts's therapist. ANNA RICHTER said getting this report would really help ED MAGEDSON in his lawsuit against Michael Roberts. Later in this conversation, TRACEY RICHTER told her mother to ask DARREN MEADE how to make a website more visible on an internet search (e.g., Google, Bing, Yahoo!, etc.) results.

Attorney Victoria Ames is believed to be a faculty member at Arizona State University College of Law. The school's website indicates that Victoria Ames was an attorney with Jaburg and Wilk before joining the College of Law. Jaburg and Wilk represents Xcentric Ventures (DBA RIPOFF REPORT) and ED MAGEDSON, the owner / operator of RIPOFF REPORT. In January 2014, ED MAGEDSON / RIPOFF REPORT paid Victoria Ames \$1,025. The memo line of this check reads, "December invoice."

On February 16, 2014, during a prison visit between TRACEY RICHTER and DONNA BISTRICAN, TRACEY RICHTER directed DONNA BISTRICAN to give BERT PITMAN

information about RIPOFF REPORT's \$25,000 reward that it issued for information leading to TRACEY RICHTER's exoneration, so BERT PITMAN could forward / publish the same on [www.traceyrichter.com](http://www.traceyrichter.com) and / or the Facebook page "Free TRACEY RICHTER." TRACEY RICHTER also told DONNA BISTRICAN to use TRACEY RICHTER's credit card to purchase / create a website. TRACEY RICHTER told DONNA BISTRICAN that both ANNA RICHTER and Russ Schertz had copies of this credit card. Later during this conversation, Donna Bistrican told TRACEY RICHTER that Donna Bistrican had seen something on Iowa Courts Online that indicated Michael Roberts made a \$20,000 payment towards an outstanding accrued support balance owed to TRACEY RICHTER. Panicked, TRACEY RICHTER directed Donna Bistrican to quickly contact RUSSELL SCHERTZ and ANNA RICHTER and have them immediately take TRACEY RICHTER's credit / debit card (where her child support payments were deposited) to her lawyer and dump all the money from the card into the attorney's trust account as a retainer, so she could "try and lock it up before [SCA Smith] [garnished it]" to pay TRACEY RICHTER's almost \$300,000 in restitution she owed Dustin Wehde's family and the State of Iowa.

On February 23, 2014, during a prison visit between TRACEY RICHTER and ANNA RICHTER, the two again discussed having BERT PITMAN pressure his father, Dr. John Pitman, into recanting / changing the testimony he gave in TRACEY RICHTER's murder trial, by having BERT PITMAN tell Dr. John Pitman that "stuff is going to come out unless you play ball." **TRACEY RICHTER said if this information came out about Dr. John Pitman, he would lose custody of his children to Lisa Pitman and his business would be ruined.** TRACEY RICHTER said BERT PITMAN should approach Dr. John Pitman under the false premise that "[they knew] Ben Smith told [Dr. John Pitman] not to talk to Tracey's lawyers, [and we just want to know what else Ben Smith said to you]." One of the two then said that BERT PITMAN should tell Dr. John Pitman that if Dr. John Pitman did not "come clean" that it would really hurt their (BERT PITMAN and Dr. John Pitman) relationship and that BERT PITMAN should tell Dr. John Pitman "Enough is enough, Daddy. You need to come clean." ANNA RICHTER said it would be great if BERT PITMAN were to record this conversation. ANNA RICHTER told TRACEY RICHTER she would contact BERT PITMAN and discuss their plan with him. Later, TRACEY RICHTER asked whether her PCR attorneys had scheduled the deposition of her criminal defense attorney(s). ANNA RICHTER said DARREN MEADE wanted to attack TRACEY RICHTER's criminal defense attorney(s) on RIPOFF REPORT, but ANNA RICHTER told DARREN MEADE "Don't you dare. We need [him / her]." ANNA RICHTER said TRACEY RICHTER's PCR attorney was a friend of one of TRACEY RICHTER's criminal defense attorneys and that this criminal defense attorney confided with TRACEY RICHTER's PCR attorney that he / she made a number of mistakes representing TRACEY RICHTER in her murder trial. ANNA RICHTER

added that ED MAGEDSON also directed DARREN MEADE not to publish anything on RIPOFF REPORT about TRACEY RICHTER's criminal defense attorneys.

On February 28, 2014, during a prison visit between TRACEY RICHTER and ANNA RICHTER, ANNA RICHTER said DARREN MEADE planned to publish complaints on RIPOFF REPORT attacking the competence / effectiveness of TRACEY RICHTER's criminal defense attorney(s), but that she instructed DARREN MEADE not to "bother [TRACEY RICHTER's criminal defense attorney] right now because [in TRACEY RICHTER's PCR case, TRACEY RICHTER's criminal defense attorney] is going to admit that he was ineffective [in his representation of TRACEY RICHTER in her murder case / trial]" and they "needed" him / her. TRACEY RICHTER said DARREN MEADE needed to wait to publish a complaint on RIPOFF REPORT about her criminal defense attorney until after the attorney testified in TRACEY RICHTER's Post Conviction Relief case, because then DARREN MEADE can publish the transcript of the attorney's own under oath admissions about the attorney's ineffective representation of TRACEY RICHTER.

It is important to note that the crux of TRACEY RICHTER's Post Conviction Relief Petition filed in Sac County District Court Case No. PCCV019511 on April 16, 2014, is that her criminal defense attorneys were ineffective in representing her. Obviously, such an admission by TRACEY RICHTER's criminal defense attorney(s) would aid TRACEY RICHTER in her PCR efforts. ANNA RICHTER told TRACEY RICHTER that complaints that are published on RIPOFF REPORT are never taken down. Later, ANNA RICHTER told TRACEY RICHTER she discussed the \$25,000 reward RIPOFF REPORT / ED MAGEDSON had offered for information leading to TRACEY RICHTER's exoneration; specifically, ANNA RICHTER told ED MAGEDSON they needed to advertise the reward in and around Sac County, Iowa.

Also during this prison visit, TRACEY RICHTER directed ANNA RICHTER to have BERT PITMAN and DARREN MEADE to tell Brandon Wehde (murder victim's first cousin) about the aforementioned \$25,000 reward, and also give him (Brandon Wehde) certain derogatory information concerning his aunt Mona Wehde's alleged acts of disloyalty to the Wehde family. TRACEY RICHTER said that someone needed to tell Brandon Wehde "you need to know the truth about what [Mona Wehde] had been up to." TRACEY RICHTER said Brandon Wehde should be given a copy of Brett Wehde's (Mona Wehde's husband, Dustin Wehde's father) suicide note, and he should be told that Mona Wehde (allegedly) planned to leave her family. ANNA RICHTER said DARREN MEADE already had published Dustin Wehde's father's suicide note on RIPOFF REPORT. TRACEY RICHTER directed ANNA RICHTER to also have DONNA BISTRICAN contact Brandon Wehde using her Facebook account. ANNA RICHTER said she was going to contact BERT PITMAN to discuss the

foregoing. TRACEY RICHTER told ANNA RICHTER to work with DARREN MEADE to create a highly visible website with content that would expose Michael Roberts to hatred, ridicule, and contempt. TRACEY RICHTER and ANNA RICHTER again went over their plan to have BERT PITMAN pressure Dr. John Pitman into changing his testimony. ANNA RICHTER told TRACEY RICHTER she exchanged documents with DARREN MEADE, and that she stores the same in her Dropbox account. TRACEY RICHTER directed ANNA RICHTER to send documents to "Marko" via Dropbox. ANNA RICHTER said she talked to ED MAGEDSON, and ED MAGEDSON had talked to attorney Victoria Ames. ANNA RICHTER said ED MAGEDSON told her that her attorney Matthew Shimanovsky is supposed to contact Victoria Ames about getting Michael Roberts' confidential therapy reports / notes from Dr. Rumberger. TRACEY RICHTER told ANNA RICHTER that her PCR attorneys needed to talk to one of the jurors who convicted her, as well as all the other jurors, but that they needed to start with this particular juror, because he / she was the **WEAKEST** one (juror). ANNA RICHTER said Julia Ofenbakh said she (Julia Ofenbakh) would like to see SCA Smith in jail. ANNA RICHTER said Julia Ofenbakh also said "that just listening to things that [SCA Smith] has done, he (SCA Smith) should be in jail." TRACEY RICHTER told ANNA RICHTER that someone should register the website [www.BenSmithSucks.com](http://www.BenSmithSucks.com). TRACEY RICHTER asked whether DARREN MEADE had anything up on RIPOFF REPORT about Mary Higgins and Anna said that Darren is concentrating on Ben Smith. ANNA RICHTER said she wanted to completely destroy SCA Smith. ANNA RICHTER said she told this to TRACEY RICHTER's new attorney Julia Ofenbakh. ANNA RICHTER said that TRACEY RICHTER's new attorney Julia Ofenbakh said the jurors in TRACEY RICHTER's criminal case were idiots. ANNA RICHTER said "I will be damned if my daughter is going to sit here eighteen years before they declare her innocent." ANNA RICHTER said they need to get this fund going because this is going to cost money.

On March 2, 2014, during a prison visit between ANNA RICHTER and TRACEY RICHTER, ANNA RICHTER said she had recently talked to ED MAGEDSON. TRACEY RICHTER directed ANNA RICHTER to send and / or receive digital copies (of something inaudible). TRACEY RICHTER said something about people giving money to TRACEY RICHTER via PayPal and that "[little bits of money add] up." The context of this conversation suggests that ED MAGEDSON had or was creating this PayPal account. ANNA RICHTER said she recently spoke with BERT PITMAN. TRACEY RICHTER said there had to be "something somewhere" about Dr. John Pitman. ANNA RICHTER said something to TRACEY RICHTER about having BERT PITMAN talk to Dr. John Pitman. ANNA RICHTER further stated she just wanted "them to be truthful." TRACEY RICHTER told ANNA RICHTER to (do something) with any information on State's witness Michael Roberts' wife, Dr. Heidi

Forsbacka, that ANNA RICHTER obtained. ANNA RICHTER told TRACEY RICHTER that Dr. Heidi Forsbacka hung up the phone when ANNA RICHTER tried to call her (Heidi Forsbacka). TRACEY RICHTER told ANNA RICHTER to have someone create the website [www.MichaelRoberts.Blogger.com.eu](http://www.MichaelRoberts.Blogger.com.eu) and publish defamatory / derogatory content on it about State's witness Michael Roberts **"so nobody will ever want to do business with him again."**

On March 7, 2014, during a prison visit between ANNA RICHTER and TRACEY RICHTER, TRACEY RICHTER told ANNA RICHTER to have BERT PITMAN take photographs of Dr. John Pitman's prescriptions, although the recording was difficult to hear at this point. Later, although still barely audible, it is believed the two discussed getting sensitive / embarrassing information about Dr. John Pitman for the purpose of blackmailing / extorting him into recanting / changing his testimony. ANNA RICHTER and TRACEY RICHTER discussed Dr. John Pitman's personal finances. TRACEY RICHTER said something about ED MAGEDSON and DARREN MEADE, and that "how someone found where he was living." TRACEY RICHTER told ANNA RICHTER to create the website "JeremyCollins.com." Jeremy Collins is another State's witness. **TRACEY RICHTER said Jeremy Collins might "freak out" after the website about him goes up and just want the stuff online about him to go away and "that's all [we] would need" [for TRACEY RICHTER to be granted a new trial through the PCR action].** TRACEY RICHTER told her mother that after [www.JeremyCollins.com](http://www.JeremyCollins.com) goes up that someone would need to approach Jeremy Collins. TRACEY RICHTER is heard telling ANNA RICHTER "they" needed to put something online about "another" one of the State's witnesses. TRACEY RICHTER and ANNA RICHTER then discussed putting up a website with information about Michael Roberts that would make "no women with half a brain want to get involved with him (ANNA RICHTER and TRACEY RICHTER believed Michael Roberts and his wife, Heidi Forsbacka (aka Heidi Roberts) were separated / divorced). TRACEY RICHTER added the following:

Well then if [Michael Roberts] wants that [derogatory website about him taken] down...**you know what the cost of taking down that website on Michael Roberts is? I want all the dirt on [SCA Smith] and what he did and I want the kids returned to you (ANNA RICHTER).** And then he can have that website taken down and he can do whatever he wants. He can run off and live where he wants. He can have whatever job -- he can scam whoever he wants in Australia. I don't care. Just go away -- go away and live in Australia.

ANNA RICHTER said Michael Roberts would not be able to get the derogatory information removed from RIPOFF REPORT because RIPOFF REPORT does not remove its complaints. ANNA RICHTER said she had to go home and scan certain documents into her computer, which the two had previously discussed, and to give them to DARREN MEADE. ANNA RICHTER listed off the derogatory information about Michael Roberts she planned to

*publish on the internet.*

On March 8, 2014, during a prison visit between TRACEY RICHTER and her mother, ANNA RICHTER, the two discussed creating a website about Heidi Forsbacka, wife of State's witness Michael Roberts.

It is important to note that TRACEY RICHTER has created similar websites in past to defame and harass those adverse to her in litigation or just adverse to her in general. TRACEY RICHTER's GoDaddy.com account records show that during her divorce / custody proceedings with Michael Roberts, TRACEY RICHTER created the website RyanKolpinSucks.com (Michael Roberts' custody / divorce attorney at one point during their divorce / custody proceedings), MichaelRobertsSucks.com (obvious reference to Michael Roberts), Mile2Sucks.com (a reference to Michael Roberts' business), and HeidiForsbackaSucks.org (Michael Roberts' wife). TRACEY RICHTER later purchased the rights to and / or created the website RichdaleGroupSucks.com (name of her apartment complex owners / management, which did not hire Sophie Edwards for a management position (despite having TRACEY RICHTER as a reference).

On March 9, 2014, during a prison visit between ANNA RICHTER told TRACEY RICHTER, ANNA RICHTER said something to TRACEY RICHTER about something ED MAGEDSON and / or DARREN MEADE had recently said. ANNA RICHTER said ED MAGEDSON gave her transcripts of the testimony Michael Roberts' gave in a deposition in Michael Roberts and ED MAGEDSON's civil case in Arizona. ANNA RICHTER stated she received other items from DARREN MEADE about Michael Roberts. ANNA RICHTER stated she e-mailed ED MAGEDSON and talked to DARREN MEADE about proving the location of IP addresses belonging to Michael Roberts (assumedly, the IP addresses from which Michael Roberts posted comments on RIPOFF REPORT). Towards the end of the visit, TRACEY RICHTER said something to ANNA RICHTER about destroying Michael Roberts socially and professionally. Later, the two discussed finding another way to reach Michael Roberts' wife, Dr. Heidi Forsbacka, and publishing defamatory / derogatory information about her on the internet. TRACEY RICHTER directed ANNA RICHTER to give ED MAGEDSON a list of the information ED MAGEDSON should request of Michael Roberts through the civil discovery process to get information about Michael Roberts's wife, Heidi Forsbacka (aka Heidi Roberts) (Michael Roberts and ED MAGEDSON were / are currently engaged in civil litigation). TRACEY RICHTER told ANNA RICHTER that Michael Roberts might "back off" if ED MAGEDSON requested certain information from / about Michael Roberts's wife. ANNA RICHTER stated that State's witnesses committed perjury when they testified against TRACEY RICHTER.

On March 14, 2014, during a prison visit between ANNA RICHTER and TRACEY

RICHTER, ANNA RICHTER said BERT PITMAN told her Dr. John Pitman denied being responsible for a derogatory news article about TRACEY RICHTER.

On March 15, 2014, ANNA RICHTER told TRACEY RICHTER she e-mailed ED MAGEDSON the other day about something having to do with Michael Roberts. ANNA RICHTER said something about ED MAGEDSON emailing DARREN MEADE about something having to do with Michael Roberts.

On March 16, 2014, ANNA RICHTER mentioned something having to do with ED MAGEDSON. ANNA RICHTER told TRACEY RICHTER how certain online articles / websites "get moved to the top [of an internet search result]." ANNA RICHTER stated she had to give something to DARREN MEADE.

On March 20, 2014, BERT PITMAN sent the following e-mail message to ANNA RICHTER and JOHN RICHTER:

This is my letter to [his father, Dr. John Pitman]. I will be sending you another e-mail in the next day or two with my detailed conversation I will have with [Dr. John Pitman] if he agrees to meet with a psychologist. Send me any changes you might have on this letter, but the next one will definitely need more input from everyone. Since it will detail prior occurrences and what will need to be done by him to make things right Thank you for your time Lil' Bert Richter

The following is BERT PITMAN's (aka Bert Richter) aforementioned letter to his father, Dr. John Pitman:

Dear John Pitman III, I appreciate you reaching out and trying to speak with me, but unfortunately, the divide between us is too great to just have a casual conversation. Even though I would love to have a father to talk to about sports and such, I cannot do so because you have failed to be one for the vast majority of my life. The times you should have given, you took. The times you should have helped me grow, you did set a good example. The times when you could have been a man, you were deceitful and showed poor character. Your actions have cause me an immense amount of pain, however, I have made it through it all and have come out the other side as a strong and enlightened man. As a man, it is on me to clearly state what you need to do to make amends. If and when, you fulfill my requests, then we can be on speaking terms and start to repair our relationship. I would like to meet with you with Dr. Coe (we can split the costs), so we can discuss the reasons for our tattered relationship and what needs to be done to fix it. Until then, communication between you and I will be solely professional, monetary, or concerning the scheduling of this meeting. BERT PITMAN

On March 21, 2014, during a prison visit between ANNA RICHTER and TRACEY RICHTER, ANNA RICHTER said BERT PITMAN planned to write Dr. John Pitman two letters. The first letter BERT PITMAN planned to write to Dr. John Pitman would be short



and to the point, and the second one would tell Dr. John Pitman that if he is to have a relationship with him (BERT PITMAN) "there are things that have to be done." ANNA RICHTER said BERT PITMAN planned to tell Dr. John Pitman that he had to make right what he had done to TRACEY RICHTER, be accountable, and come forward with the truth. TRACEY RICHTER said Dr. John Pitman needed to "step up." ANNA RICHTER said BERT PITMAN told her Dr. John Pitman was going to come forward with the truth. Then, TRACEY RICHTER and ANNA RICHTER begin to whisper, but you can hear TRACEY RICHTER say BERT PITMAN needed to get Dr. John Pitman to say that law enforcement and Michael Roberts told Dr. John Pitman what to say. TRACEY RICHTER then said Dr. John Pitman needed to swear out an affidavit that TRACEY RICHTER never tried to kill Dr. John Pitman. TRACEY RICHTER directed ANNA RICHTER to have BERT PITMAN find out whether Michael Roberts tried to intimidate Dr. John Pitman. Later in this visit, ANNA RICHTER told TRACEY RICHTER that BERT PITMAN stated he was going to make Dr. John Pitman come forward with the truth and correct this mistakes.

Dr. John Pitman recently told law enforcement that BERT PITMAN hand delivered Dr. John Pitman with a copy of his aforementioned letter on or around April 7, 2014, and that they discussed going to therapy / counseling, but never did. Dr. John Pitman also said BERT PITMAN had never asked Dr. John Pitman to retract or change his testimony or to swear out an affidavit.

Dr. John Pitman stated his medical practice has lost an estimated \$600,000 since these defamatory / derogatory articles about him first appeared on RIPOFF REPORT. Similarly, State's witness Raymond Friedman and Michael Roberts also informed SCA Smith that their respective businesses had suffered greatly as a result of DARREN MEADE's RIPOFF REPORT complaints / articles.

In late April 2014 / early May 2014, DARREN MEADE and ED MAGEDSON had a falling-out. Apparently, DARREN MEADE quit working, ED MAGEDSON stopped paying DARREN MEADE because DARREN MEADE quit working, and DARREN MEADE believed he should be paid for doing nothing. When ED MAGEDSON refused to pay DARREN MEADE, DARREN MEADE threatened ED MAGEDSON / RIPOFF REPORT that if ED MAGEDSON / RIPOFF REPORT did not pay DARREN MEADE money and fulfill other demands, DARREN MEADE would expose RIPOFF REPORT to civil, maybe even criminal liability.

On May 15, 2014, DARREN MEADE (darrenmitchellm@gmail.com) wrote the following e-mail to ED MAGEDSON (westerned@aol.com): "I can document with log files, screen recordings and search histories the thousands of hours I spent researching to help ED MAGEDSON and TRACEY RICHTER."

In another May 15 e-mail between DARREN MEADE, ED MAGEDSON, SIAMACK

YAGHOBI, ANNA RICHTER (anna\_richter2003@yahoo.com), and (adam@ripoffreport.com) [Adam Kunz General Counsel for XCENTRIC VENTURES, LLC], DARREN MEADE alleged that ED MAGEDSON directed and demanded DARREN MEADE to make changes to a video and that DARREN MEADE took down the "posts". DARREN MEADE further stated in this e-mail that he had no animosity towards Michael Roberts and that he worked at ED MAGEDSON's direction. DARREN MEADE also told ED MAGEDSON the following:

"ANNA RICHTER, TRACEY RICHTER's mother, called and begged me to come testify at the murder trial. I could not walk at the time, and was threatened with arrest if I set foot in Iowa. When TRACEY RICHTER was convicted I felt responsible, I allowed myself to be intimidated and ignored Anna's pleas for help...that is why [sic] drove me...not hatred."

DARREN MEADE's above-assertions, by his own prior admissions and all available evidence / information, are patently false. In fact, DARREN MEADE did not even know ANNA RICHTER until after TRACEY RICHTER had been convicted of murder.

In a May 16, 2014, e-mail, ED MAGEDSON sent the following e-mail to MEADE:

I am sick about what you seem to be trying to claim! We have never had a contract for you to work for my company. We specifically documented that we would have no contracts unless in writing. You are certainly not an employee of me or my company. I have been your friend. **WE HAVE HAD A MUTUAL CAUSE, TO FREE TRACY RICHTER, AND TO EXPOSE MICHAEL ROBERTS TO THE WORLD FOR HIS HYPOCRITICAL AND DISHONEST DEALINGS.** I have supported your living expenses to allow you to continue with YOUR work towards those goals. I certainly never had a direction or control over the work. In fact, many of the things that you stated you would do have never happened. And, now you are telling me that you lost your research. What a disappointment. What a blunder. Darren, some of the things you write about make it seem like you feel entitled to get certain things at my expense, like rent and a car and food. I don't help you with those things because I am obligated. **I [GAVE YOU MONEY] BECAUSE I WANTED TO HELP YOU, MY FRIEND, AND I WANTED TO SUPPORT YOUR CRUSADE TO SEE JUSTICE IN THE TRACY RICHTER CASE.**

In another May 16, 2014, e-mail from ED MAGEDSON to DARREN MEADE, ED MAGEDSON admitted paying DARREN MEADE to help / do work associated with TRACEY RICHTER at ED MAGEDSON's direction.

On May 17, 2014, MEADE sent the following e-mail to ANNA RICHTER, ED MAGEDSON, and SIAMACK YAGHOBI:

Anna, the video's I made on behalf of Tracey and exposing Michael Roberts and Ben Smith have were disabled for some reason on RIPOFF REPORT. I was hopeful my issues with Ed would not affect my advocacy work on Tracey's behalf, but ever video I had made has been

disabled. The majority of the video's I had also placed onto a website I made for Tracey located at <http://traceyrichter.com> had many of the same video's which I published on RIPOFF REPORT. Those video's are operational, I pay for that site every 3 months ( \$39.95 ) and will send you the billing information so you can continue the website. It would seem that my ability to post video's on Tracey's behalf no longer exists on RIPOFF REPORT. I will post a new video on <http://traceyrichter.com> it will not have the viewership of RIPOFF REPORT, but given my video's were disabled I believe this is the best course of action. I've copied Ed and Michael's friend [SIAMACK YAGHOB] on this e-mail for transparency. I wanted to alert you to what had taken place on RIPOFF REPORT and assure you it was nothing that I participated in, and again, the website I control still has the video's active :: perhaps, I am wrong and there is another reason the video's are disabled on RIPOFF REPORT but active on other websites?

In a May 17, 2014, e-mail from ED MAGEDSON (EDitor@ripoffreport.com) to DARREN MEADE (dmeade@kairos-meade.com), ED MAGEDSON said the following: "Anyone that knows you knows you've had an obsession to go after [Michael Roberts] for your own, and [TRACEY RICHTER] just got some of the benefits." Later on in the above-e-mail (or another one sent on this same date) ED MAGEDSON admitted he paid DARREN MEADE to work on matters involving TRACEY RICHTER and RIPOFF REPORT.

Just some of RIPOFF REPORT's bank records show that between December 2011 and May 2014, RIPOFF REPORT paid DARREN MEADE approximately \$90,000 from its Bank of America account. ED MAGEDSON has also discussed paying DARREN MEADE from other sources, such as prepaid credit cards. Most telling in all this, however, is ED MAGEDSON paid DARREN MEADE \$3,000.00 just days after DARREN MEADE began extorting RIPOFF REPORT / ED MAGEDSON. As indicated above, throughout May 2014, DARREN MEADE told ED MAGEDSON / RIPOFF REPORT he was prepared to make public the fact that he worked at ED MAGEDSON's direction in their joint efforts to "help" TRACEY RICHTER and published RIPOFF REPORT complaints about the State's witnesses. Rather than alert the authorities to DARREN MEADE's extortionist efforts, ED MAGEDSON / RIPOFF REPORT instead asked DARREN MEADE for a list of his demands, which DARREN MEADE provided, and ED MAGEDSON / RIPOFF REPORT at least partially met.

On May 28, 2014, DARREN MEADE contacted a plaintiff adverse to RIPOFF REPORT in pending civil litigation. DARREN MEADE informed the plaintiff he (DARREN MEADE) had worked for XCENTRIC VENTURES from January 2012 to May 2014, and that he was now adverse to ED MAGEDSON / RIPOFF REPORT, and he was willing provide evidence to this plaintiff on certain conditions.

On June 19, 2014, DARREN MEADE published the following "Tweet" on his Twitter

account: "Attention: Alleged RIPOFF REPORT Victims! Please know I am available for depositions June 23-27<sup>th</sup> in Laguna Beach, CA" @darrenmeade (DARREN MEADE's Twitter account "handle").

On June 25, 2014, at 4:22 pm CST, one of ED MAGEDSON's / RIPOFF REPORT's attorneys was sent an e-mail, which asked whether said attorney planned to attend DARREN MEADE's depositions (as advertised on DARREN MEADE's Twitter account) and provided a link to DARREN MEADE's above-Tweet. Interestingly, also on June 25 and on 26, 2014, ED MAGEDSON / RIPOFF REPORT allowed DARREN MEADE to publish add-on complaints / comments to existing RIPOFF REPORT complaints Nos. 970019 and 938843, which condemned SCA Smith for garnishing TRACEY RICHTER's prison funds. It is not know at this time whether DARREN MEADE published these comments before or after ED MAGEDSON's / RIPOFF REPORT's attorney was sent the e-mail described above.

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CONCLUSION

Based on my training and experience, and the facts as set forth in this affidavit, there is probable cause to believe TRACEY RICHTER (aka SOPHIE EDWARDS), DONNA BISTRICAN, ANNA RICHTER, DARREN MEADE, BERT PITMAN (aka BERT RICHTER), ED MAGEDSON, SIAMACK YAGHOBİ (aka SAM YOUBANKS) and XCENTRIC VENTURES / RIPOFF REPORT have committed the crimes set forth below, either directly, or by aiding and abetting another in and with the same crimes, and the property and information described in Attachments A and B to this Search Warrant is property / information used or possessed with the intent to be used as the means of committing a public offense or concealed to prevent an offense from being discovered and / or is property relevant to the crimes discussed below and material as evidence in a criminal prosecution for the same or any related offenses.

WITNESS TAMPERING

"A person who, in retaliation for anything lawfully done by any witness...in any case, harasses such witness, or conspires to do the same...commits an aggravated misdemeanor. IOWA CODE §§ 720.4, 706.1 (2013). In Iowa, an aggravated misdemeanor is an indictable offense. Iowa Const. Art. 1 § 11; IOWA CODE § 903.1(2) (2013); Iowa Rule of

Criminal Procedure 2.4(2) (2013) Here, the harassment was done by communicating with a State's witness in a criminal matter filed in the Sac County District Court, by electronic communication, without legitimate purpose, in a manner likely to cause the witness annoyance or harm and with the specific intent to intimidate, annoy or alarm the witness and, with the intent to produce detrimental effects within Iowa, and the subject's actions did produce detrimental effects within Iowa. Witness Tampering in Iowa is an indictable offense. IOWA CODE § 708.7(1) (2013); IOWA CODE § 720.4 (2013); I.A. Const. art. I, § 11; IOWA CODE § 903.1(2) (2013); Iowa R. Crim. P. 2.4(2); IOWA CODE § 803.1 (2013)

Based on the evidence / information contained in this application, there is probable cause to believe that beginning in 2012, TRACEY RICHTER, DARREN MEADE, ED MAGEDSON, ANNA RICHTER, RUSSELL SCHERTZ, DONNA BISTRICAN, and / or BERT PITMAN have been engaged in a systematic and ongoing campaign of cyber / internet harassment and defamation aimed directly at the State's witnesses, in retaliation for their cooperation with law enforcement and testimony against TRACEY RICHTER in State v. Richter, Sac County District Court Case No. FECR011900.

The available evidence strongly suggests DARREN MEADE, ANNA RICHTER, TRACEY RICHTER, ED MAGEDSON / RIPOFF REPORT, BERT PITMAN, RUSSELL SCHERTZ, knew most of the demeaning, derogatory content they published about the State's witnesses on the RIPOFF REPORT and other sites was / is *per se* defamatory.

The available evidence shows that in January 2012, ED MAGEDSON / RIPOFF REPORT and at least one of ED MAGEDSON's / RIPOFF REPORT's attorneys was aware of DARREN MEADE's aforementioned deposition wherein DARREN MEADE, among many other damning admissions, testified to the following: that DARREN MEADE was hired by convicted felons to defame a witness for the purpose of harassing and intimidating the witness into settling his civil case with these convicted felons (i.e., that DARREN MEADE was once a "liar for hire"); that Michael Roberts' was ADAM ZUCKERMAN's victim, not his partner, the latter of which DARREN MEADE alleged in seventy-five (75%) or more of all his RIPOFF REPORT complaints he published about the State's witnesses; that DARREN MEADE, when he was working for and with these convicted felons, had actually removed RIPOFF REPORT complaints from the internet by injecting the above-describe illicit SQL source code into RIPOFF REPORT's servers; and that "RIPOFF REPORT never deletes anything written about somebody. So it's the perfect place to defame somebody because it will always stay up, and for some reason it winds up ranking on the first page of Google. So if you want to destroy somebody's reputation, that's a great place to do it." Additionally, DARREN MEADE and ED MAGEDSON / RIPOFF REPORT have alleged the testimony given by the State's witnesses against TRACEY RICHTER during her trial were in direct

conflict with the testimony they gave in their depositions, which is patently false. TRACEY RICHTER, ANNA RICHTER, and RUSSELL SCHERTZ provided DARREN MEADE and ED MAGEDSON / RIPOFF REPORT with copies of the discovery in TRACEY RICHTER's criminal trial, including the transcripts from the depositions of the State's witnesses.

As discussed earlier, in April 2013, TRACEY RICHTER and ANNA RICHTER learned of DARREN MEADE's deposition, as SCA Smith referenced it in his Motion to Quash TRACEY RICHTER's subpoena duces tecum to the Sac County Sheriff, and even included DARREN MEADE's quote about how RIPOFF REPORT is a "great place" to destroy someone's reputation. As discussed earlier, on July 20, 2012, after learning SCA Smith had received DARREN MEADE's deposition pursuant to a court order subpoena, DARREN MEADE pleaded with the subpoenaed party, Dr. Scott Connelly, to "pull back" the deposition from SCA Smith and tell SCA Smith the transcript was inaccurate. Also in April 2013, ED MAGEDSON / RIPOFF REPORT received a copy of SCA Smith's Motion to Quash. Additionally, in May 2013, ED MAGEDSON / RIPOFF REPORT learned of the 2011 e-mail DARREN MEADE sent to convicted felon ADAM ZUCKERMAN wherein DARREN MEADE suggested that for the purpose of furthering DARREN MEADE and ADAM ZUCKERMAN's felonious enterprises, they should begin publicly accusing Michael Roberts of Dustin Wehde's murder (i.e., that Michael Roberts sent Dustin Wehde into he and TRACEY RICHTER's home to attack TRACEY RICHTER, which resulted in TRACEY RICHTER shooting (nine times) and killing Dustin Wehde).

Despite having unimpeachable evidence as early as January 2012, that DARREN MEADE had previously been hired / paid by convicted felons to defame witnesses online and that most of the content in DARREN MEADE's RIPOFF REPORT complaints were patently false, ED MAGEDSON / RIPOFF REPORT paid DARREN MEADE to create defamatory, harassing RIPOFF REPORT complaints about the State's witnesses, and provided him with unfettered access to RIPOFF REPORT, a "great place to destroy someone's reputation," which by DARREN MEADE's own admissions, had the ability to attract up to two million viewers per day. In addition to paying DARREN MEADE over at least \$80,000.00 to create RIPOFF REPORT complaints about the State's witnesses and publicize the same, ED MAGEDSON / RIPOFF REPORT, aware of the factual, under oath assertions contained in DARREN MEADE's deposition, sought out major news media to advertise and vouch for the credibility of DARREN MEADE's work on RIPOFF REPORT, specifically, DARREN MEADE's RIPOFF REPORT complaint No. 938843.

Another example of ED MAGEDSON / RIPOFF REPORT protecting and vouching for DARREN MEADE is on or around September 14, 2012, when Michael Roberts made a

comment / rebuttal to DARREN MEADE's September 9, 2012, RIPOFF REPORT complaint (No. 938843) about the State's witnesses, which he titled:

[DARREN MEADE] OF KAIROS-MEADE IN LAGUNA BEACH CALIFORNIA. [DARREN MEADE] IS A PAID REPUTATION-HITMAN WORKING FOR ED MAGEDSON OF RIPOFF REPORT THESE POSTINGS ARE IN RESPONSE TO MY REFUSING TO SUBMIT TO DARREN MEADE'S EXTORTION DEMANDS IN OCTOBER 2011, AND MY EXPOSÉS ON ED MAGEDSON'S APPALLING BUSINESS PRACTICES.

In this comment / rebuttal, Michael Roberts provided hyperlinks to information that poked holes in DARREN MEADE's credibility and the substantive content of his RIPOFF REPORT complaint about the State's witnesses and corroborated Michael Roberts' comment. However, sometime after Michael Roberts' posted this comment, ED MAGEDSON / RIPOFF REPORT removed or "redacted" Michael Roberts's hyperlinks and amended the above-title of his rebuttal to the following: "\*UPDATE .. FROM [ED MAGEDSON] - NEITHER RIPOFF REPORT, NOR ED MAGEDSON ENGAGED, HIRED OR REQUESTED DARREN MEADE TO WRITE THIS STORY."

Also, it is important to note that the original URL for DARREN MEADE's November 9, 2012 (published on November 11, 2012), RIPOFF REPORT complaint No. 938843 was <http://www.ripoffreport.com/ben-smith-michael-roberts-rexxfield/prosecutorial-misconduct/sac-city-sac-county-iowa-B1A77.htm> However, the URL for the same RIPOFF REPORT complaint is now <http://www.ripoffreport.com/r/Ben-Smith-Sac-County-Iowa-Prosecutor-Prosecutorial-Misconduct-Tracey-Richter-Falsely-Convicted-Overwhelming-Evidence-Michael-Roberts-Rexxfield/Sac-City-Iowa/Ben-Smith-Sac-County-Iowa-Attorney-prosecutorial-misconduct-improper-relationship-with-st-938843>

It is not difficult to understand why this change was made, considering the following e-mail ED MAGEDSON / RIPOFF REPORT sent to SIAMACK YAGHOBI on September 18, 2013:

I put [the reviews] at the beginning for a reason. Look – the ONLY reason why [RIPOFF REPORT customers / victims] are talking to you (SIAMACK YAGHOBI aka SAM YOUNG, RIPOFF REPORT CAP and Verified salesman) is, because, they are listed on Google and they want that listing to change!!! Once [the RIPOFF REPORT customer / victim sees] that – that the title is changed out! And we inject over 500 to over 1,000 words before the [RIPOFF REPORT customer's / victim's defamatory RIPOFF REPORT complaint] with new titles that reflect [the RIPOFF REPORT customer's / victim's commitment to satisfaction etc.. that is all they will care about – they will listen to anything you have to say my Aladdin.

As discussed earlier, on September 9, 2012, DARREN MEADE and ED MAGEDSON published RIPOFF REPORT complaint No. 938843, which, among other things, accuses the State's witnesses of perjury and theft, and contains comments and a myriad of

hyperlinks (which, unlike those hyperlinks published by Michael Roberts that are mentioned above) to other salacious, defamatory stories concerning the State's witnesses. ED MAGEDSON and DARREN MEADE have placed this RIPOFF REPORT complaint, on each of RIPOFF REPORT's approximate 1.8 million webpages (No. 938843). ED MAGEDSON and DARREN MEADE have bragged about RIPOFF REPORT's visibility on the internet. By DARREN MEADE's own admission, RIPOFF REPORT complaint No. 938843 has been viewed 1.2 BILLION times. RIPOFF REPORT complaint No. 938843 contains a myriad of hyperlinks and "rebuttal" or add-on complaints, which redirects readers / viewers to other salacious / defamatory RIPOFF REPORT "complaints" about the State's witnesses made by DARREN MEADE and other anonymous authors.

As noted above, DARREN MEADE has admitted to authoring some of the other RIPOFF REPORT complaints about the State's witnesses. The evidence shows DARREN MEADE was / is an agent of RIPOFF REPORT / ED MAGEDSON. ED MAGEDSON has paid DARREN MEADE over one hundred thousand dollars (either directly or indirectly) to create the content published in the RIPOFF REPORT complaints about the State's witnesses, all in effort to "help" TRACEY RICHTER and ANNA RICHTER. Since December 2012, ED MAGEDSON / RIPOFF REPORT, from just one of ED MAGEDSON's / RIPOFF REPORT' bank accounts, has paid DARREN MEADE over \$80,000.00 either directly or indirectly. Evidence demonstrates that DARREN MEADE received additional compensation from ED MAGEDSON / RIPOFF REPORT from other sources in this same timeframe. Additionally, phone records show that from April 2012 and December 2013, DARREN MEADE's mobile phone called ED MAGEDSON's mobile phone 336 times for a total of 50 hours, and sent ED MAGEDSON's mobile phone 854 text messages. In this same timeframe, ED MAGEDSON's mobile phone called DARREN MEADE's mobile phone 1503 times for a total of 279 hours, and sent DARREN MEADE's mobile phone 954 text messages.

DARREN MEADE's SPRINT PCS mobile phone records for number (949) 357-6193 shows that through April 2012 and December 2013, DARREN MEADE called (602) 518-4357, which is a Leap Wireless (dba Cricket Wireless) believed to be ED MAGEDSON's phone, 366 times for a total of approximately 50 hours. ED MAGEDSON is the owner / operator of ROR. In this same timeframe DARREN MEADE sent Magedson 854 text messages. Also in this same timeframe, Magedson called DARREN MEADE 1,503 times for a total of 279 hours. In this same time, ED MAGEDSON sent DARREN MEADE 954 text messages.

In addition to knowing the defamatory, harassing complaints, were patently false, DARREN MEADE and ED MAGEDSON / RIPOFF REPORT, crafted said complaints so the same would be highly visible in legitimate Google-type search results for the State's witnesses and / or their businesses.



The most salacious, defamatory RIPOFF REPORT complaints about the State's witnesses, however, are made by anonymous and / or fictitious persons. The information contained in this application, however, demonstrates DARREN MEADE, ED MAGEDSON / RIPOFF REPORT, TRACEY RICHTER, and her family and friends are or know the identities of these anonymous authors and / or have colluded with them on some level. Example 1: RIPOFF REPORT complaints No. 1049232 and 1000888 contain the same photograph of State's witness Dr. John Pitman; the first was published by DARREN MEADE, and the latter by a "BRETT COLLINS." Example 2: The titles of all the RIPOFF REPORT complaints concerning the State's witnesses, although they appear nonsensical and choppy, are worded to maximize their visibility in results of legitimate internet searches for the same people / businesses. As noted earlier, this is the same method of labeling / titling RIPOFF REPORT complaints ED MAGEDSON and DARREN MEADE suggested private investigator Tina Church use to maximize the visibility of any RIPOFF REPORT complaints she may publish on their behalf. A cursory examination of the titles used in just a sampling of RIPOFF REPORT complaints demonstrates most are about consumer issues, not events not related to consumers and businesses, such as murder cases, and that the titles to most of these complaints read something like the following title pulled from a recently published RIPOFF REPORT complaint: "[COMPANY / BUSINESS NAME] DOES NOT BACK PRODUCT AND HAS NO VIABLE SUPPORT MECHANISM NATIONWIDE." Whereas the title of DARREN MEADE's RIPOFF REPORT complaint No. 1009000, published on February 7, 2013 is as follows:

MILE2 MICHAEL ROBERTS REXXFIELD RAYMOND FRIEDMAN MARIE FRIEDMAN  
GRAPHIC DEPICTIONS OF CHILD MOLESTATION, CHILD TORTURE, EXACT RECIPES  
OF LIQUID EXPLOSIVES, PIPE BOMBS ILLICIT RECORDINGS, INTERNET

Comparing the above-title with the one below for RIPOFF REPORT complaint No. 990368, which published by anonymous author "LOST BOY" leaves no doubt DARREN MEADE and "LOST BOY" are somehow connected, if not the same:

MIKE ROBERTS MILE2 REXXFIELD.COM CHILD TORTURE AND CHILD  
PORNOGRAPHY, EXACT RECIPES FOR THE MANUFACTURE OF LIQUID EXPLOSIVES  
AND PIPE BOMBS, INTERNET

Example 3: Communications between the above-named individuals obtained by law enforcement show that some of the personal / sensitive information contained in some of the RIPOFF REPORT complaints authored by these anonymous / fictitious persons, was given to DARREN MEADE by TRACEY RICHTER's friends / family. Example 4: The subject matter of these anonymous RIPOFF REPORT complaints closely follow TRACEY RICHTER's conversations about the same subject matter with ANNA RICHTER and her fiancé, RUSSELL SCHERTZ.

The evidence clearly shows that DARREN MEADE ED MAGEDSON / RIPOFF REPORT, and the anonymous authors (who the evidence demonstrates most likely are, or have some close association with DARREN MEADE and ED MAGEDSON / RIPOFF REPORT), have titled their harassing, defamatory RIPOFF REPORT complaints and their respective add-on comments / rebuttals to reach not only the “two million viewers per day” they bragged about, but more importantly, to friends love interests, prospective employers / customers, etc. who / which after conducting a legitimate / benign search result for one of the witnesses, would almost certainly find one of these RIPOFF REPORT complaints at the very top of the first page of the search result. Example: Today, June 26, 2014, SCA Smith searched “Marie and Raymond Friedman” using Google. Again, Marie and Raymond Friedman were two key State’s witnesses. The first three search results for “Marie and Raymond Friedman” (the parentheses were not part of the search terms entered in Google) return links to RIPOFF REPORT complaints with the following titles:

- MILE2 MICHAEL ROBERTS REXXFIELD RAYMOND FRIEDMAN MARIE FRIEDMAN GRAPHIC DEPICTIONS OF CHILD MOLESTATION, CHILD TORTURE, EXACT RECIPES OF LIQUID EXPLOSIVES, PIPE BOMBS ILLICIT RECORDINGS, INTERNET (RIPOFF REPORT No. 1009000)
- MILE2 MICHAEL ROBERTS RAY FRIEDMAN CONSPIRE TO DEFRAUD MAJORITY PARTNER TRACEY RICHTER IN ORDER TO USE MILE2 TO STEAL GOVERNMENT [SIC] SECRETS VIA SOCIAL ENGINEERING AMAN BHAR, MATTHEW RAIKES, NICK DUMITRU, PAUL PORTELLI, WIKI LEAKS SOURCE, SOCIAL ENGINEERING UTILIZED AGAINST U.S. MILITARY, MARIE FRIEDMAN, HACKING OF MILITARY SECRETS, LIJIT NETWORKS TAMPA, FLORIDA (RIPOFF REPORT No. 980023)
- The third result was a link to the search result within RIPOFF REPORT to the first of the three RIPOFF REPORT complaints listed here (No. 1009000)

As mentioned earlier, on January 1, 2012 ED MAGEDSON wrote check No. 2498 for \$2,500 to DARREN MEADE from the XCENTRIC VENTURES (dba RIPOFF REPORT), LLC bank account. The memo line of the check stated “[Public Relations] thru Feb 15, 2012”. Evidently, the so-called public relations affected by DARREN MEADE since his engagement by ED MAGEDSON can only be described as a scorched-earth campaign against each and every State’s witnesses. This includes literally hundreds of webpages, images, videos, or comments on websites that are not RIPOFF REPORT, that are conspicuously search-engine-optimized so as draw the viewer / reader back to defamatory, harassing RIPOFF REPORT complaints, to cause maximum damage to each State’s Witness when the names or businesses are searched in Google or other search engines. In short, the reader / viewer of legitimate internet content, is almost always one click away from landing on one of the many RIPOFF REPORT complaints about the State’s witnesses.

Most telling, however, is the crux of the defamatory, harassing RIPOFF REPORT complaints published on RIPOFF REPORT by DARREN MEADE and ED MAGEDSON / RIPOFF REPORT center on the personal and professional lives of the four State's witnesses DARREN MEADE identified as being most responsible for TRACEY RICHTER's conviction (i.e., Dr. John Pitman, Mary Higgins, Marie Friedman, and Raymond Friedman) and thoughtful alternative theories of the TRACEY RICHTER's case. In fact, Jeremy Collins, the war (Iraq) wounded combat veteran, whose alleged involvement as the mysterious "second intruder" in the imagined home invasion, was the heart and soul of TRACEY RICHTER's defense theory. In fact, TRACEY RICHTER flopped around defense counsel's table, feigning terror, as the "second intruder," as Jeremy Collins entered the courtroom and made his way to the witness stand, which looking back, explains why TRACEY RICHTER's criminal defense attorneys covered TRACEY RICHTER's eyes when SCA Smith displayed a photograph of Jeremy Collins during a deposition, just a few weeks before her trial started. Regardless, in a recorded conversation between TRACEY RICHTER and one of the investigators back in 2002, TRACEY RICHTER (unknowingly) positively excluded Jeremy Collins as the second intruder. In the hundred-plus hours of audio recorded phone conversations and visits, SCA Smith only recalls TRACEY RICHTER mentioning / discussing Jeremy Collins one time, which was she told her mother to create the website [www.JeremyCollins.com](http://www.JeremyCollins.com), in the hopes that Jeremy Collins would "freak out" and "just want things to go away." In the ten years that followed Dustin Wehde's murder, TRACEY RICHTER described the alleged second intruder as being Caucasian, Hispanic / Caucasian, and Middle Eastern. One time TRACEY RICHTER said the second intruder had worn a ski throughout the entire alleged home invasion. TRACEY RICHTER also described second intruder's height as being anywhere from 5'7" to 6'2". One time she described the alleged second intruder's build as being slender, but later described him as having a heavier physique. TRACEY RICHTER once told law enforcement that the second intruder was not strong enough to pick her up off the ground, another time she said he picked held her up off the ground to the point her feet were dangling.

The fact that this narrative (Jeremy Collins as the second intruder) is largely ignored in DARREN MEADE's "investigation" and subsequent RIPOFF REPORT complaints and comments, which just so happen to target, on an unfathomable scale (1.8 million webpages viewed over a billion times), the professional and personal lives of the four State's witnesses DARREN MEADE identified as being most responsible for TRACEY RICHTER's conviction, is just one of many examples proving the RIPOFF REPORT complaints concerning the State's witnesses were created and published to harass and defame the State's witnesses for cooperating and testifying against TRACEY RICHTER, and not for any legitimate purpose.

As for TRACEY RICHTER and ANNA RICHTER, the information contained in this affidavit demonstrates that, on multiple occasions, TRACEY RICHTER and ANNA RICHTER discussed creating derogatory websites about some of the State's witnesses to cause them "freak out" and "just want it all to go away" (Jeremy Collins). Additionally, the evidence shows that TRACEY RICHTER, ANNA RICHTER, and their friends and family provided DARREN MEADE and / ED MAGEDSON RIPOFF REPORT with the information (e.g., reports, photographs, and other sensitive information knowing DARREN MEADE and ED MAGEDSON / RIPOFF REPORT, they knew would be used in RIPOFF REPORT complaints concerning the State's witnesses.

What the evidence also makes clear is that ANNA RICHTER has control over what DARREN MEADE and ED MAGEDSON publish on RIPOFF REPORT. As discussed earlier, ANNA RICHTER told TRACEY RICHTER that DARREN MEADE intended to publish a derogatory RIPOFF REPORT complaint concerning the poor legal defense he (DARREN MEADE) believed they provided TRACEY RICHTER, but that ANNA RICHTER stopped him from doing such because, according to ANNA RICHTER, TRACEY RICHTER's criminal defense attorney(s) planned to admit to some level of ineffectiveness in TRACEY RICHTER's Post Conviction Relief proceedings. Also, in addition to paying DARREN MEADE, phone records show that from between April 2012 and December 2013, there were 120 phone calls made between DARREN MEADE's Sprint PCS mobile phone and ANNA RICHTER's Verizon Wireless phone No. (515) 401-8926, totaling approximately 43 hours of total talk time.

Furthermore, your applicant cannot think of any reason why information about any of the State's witnesses **CHILDREN** (not referring to N.R. or M.R.) would be needed for any legitimate purpose having to do with TRACEY RICHTER's legal defense.

## EXTORTION

A person commits extortion if the person does any of the following with the purpose of obtaining for oneself or another anything of value, tangible or intangible, including labor or services, or conspires to do the same: threatens to inflict physical injury on some person, or to commit any public offense; threatens to accuse another of a public offense; threatens to expose any person to hatred, contempt, or ridicule; threatens to harm the credit or business or professional reputation of any person; threatens to take or withhold action as a public officer or employee, or to cause some public official or employee to take or withhold action; threatens to testify or provide information or to withhold testimony or information with respect to another's legal claim or defense; threatens to wrongfully injure the property of another. Extortion is a Class "D" Felony. IOWA CODE § 711.4 (2013)

During at least two prison visits between TRACEY RICHTER and ANNA RICHTER at the Iowa women's prison in Mitchellville, the two conspired to use BERT PITMAN to threaten to expose State's witness Dr. John Pitman to hatred, ridicule and contempt. Specifically, the two plotted to have BERT PITMAN tell Dr. John Pitman that unless Dr. John Pitman recanted and / or changed the testimony he gave in TRACEY RICHTER's murder trial (or in TRACEY RICHTER's own words "play ball"), TRACEY RICHTER, ANNA RICHTER, and / or BERT PITMAN would give Dr. John Pitman's wife, Lisa Pitman, personal, confidential, and sensitive information about Dr. John Pitman and his former girlfriend, Allisan Tucker, for Lisa Pitman to use against Dr. John Pitman in their pending divorce proceedings.

The statements made by TRACEY RICHTER and ANNA RICHTER concerning their plan to extort Dr. John Pitman were not cherry-picked from a years worth of prison visits. The twenty or so prison visits that were recorded, occurred between February and March 2014. The recordings for half of the visits are not audible. TRACEY RICHTER and ANNA RICHTER discussed their "plan" to extort and harass Dr. John Pitman in four or five of the ten recordings that were audible.

It is clear from ANNA RICHTER's and BERT PITMAN's e-mail communications with ANNA RICHTER, specifically, his e-mail containing the letter he had ANNA RICHTER review before he personally handed the same to Dr. John Pitman, that ANNA RICHTER relayed TRACEY RICHTER's orders to BERT PITMAN, which would be an overt act in furtherance of the conspiracy.

Also, ED MAGEDSON / RIPOFF REPORT agents / employees DARREN MEADE and / or YAGHOBBI contacted Dr. John Pitman and offered to remove all RIPOFF REPORT complaints about him for \$10,000, which were created and published by DARREN MEADE and ED MAGEDSON / RIPOFF REPORT, DARREN MEADE, ED MAGEDSON / RIPOFF extorted Dr. John Pitman.

RIPOFF REPORT / XCENTRIC VENTURES' conduct bears a reasonable relation to a legitimate state interest, which is letting potential / future witnesses in Iowa feel they can come forward and give full (complete) and accurate testimony without fear of having their personal and professional lives destroyed by out-of-state cyber hitmen hired by, and / or working at the direction of the person against whom they are testifying. IOWA CODE § 803.1 (2014)

Furthermore, ED MAGEDSON / RIPOFF REPORT provided free advertising space on over 1.8 Million pages of his website to the TRACEY RICHTER and ANNA RICHTER who are Iowa residents, as consideration for their efforts in the conspiracy. Regardless, as discussed below, DARREN MEADE's and ED MAGEDSON's / RIPOFF REPORT's extortion of Dr. John Pitman can be used to prove it or its agents have engaged in Ongoing

Criminal Conduct / Specified Unlawful Activity, which is “any act, including any preparatory or completed offense, committed for financial gain on a continuing basis, that is punishable as an indictable offense under the laws of the state in which it occurred and under the laws of this state.” IOWA CODE § 706A.1(5) (2013)

Additionally, as discussed earlier, the evidence strongly suggests RIPOFF REPORT and / or its agents or employees created defamatory RIPOFF REPORT complaints concerning Dr. Richard Weiss, Global Legal Resources, LLP, Westlake Financial Services, Payment Systems Corp, Dr. Gary Motykie, and Dr. Payam John Kahen, and then reached out to help them mitigate / correct the damage it appears RIPOFF REPORT and / or its agents or employees caused.

#### OBSTRUCTING PROSECUTION

“A person who, with intent to prevent the apprehension or obstruct the prosecution or defense of any person, knowingly...makes available false evidence or furnishes false information with the intent that it be used in the trial of that case, or conspires to do the same, commits an aggravated misdemeanor. IOWA CODE §§ 719.3, 706.1 (2013) In Iowa, an aggravated misdemeanor is an indictable offense. Iowa Const. Art. 1 § 11; IOWA CODE § 903.1(2) (2013); Iowa Rule of Criminal Procedure 2.4(2) (2013)

DARREN MEADE knowingly made available false evidence and / or furnished false information with the intent that said evidence / information be used in the proceedings following TRACEY RICHTER's murder conviction (e.g., direct appeal and Post Conviction Relief), when DARREN MEADE contacted SCA Smith in April 2012, and alleged he provided information to law enforcement in Iowa proving TRACEY RICHTER's second ex-husband, Michael Roberts, not TRACEY RICHTER, was responsible for Dustin Wehde's death. Because around the same time DARREN MEADE supposedly contacted law enforcement in Iowa, DARREN MEADE was conspiring with two convicted felons to publicly accuse Michael Roberts of attacking his wife, TRACEY RICHTER, to “pressure” and coerce Michael Roberts into handing his business, Rexxfield, over to DARREN MEADE and his felonious “partners.” Despite this, after DARREN MEADE learned the convicted felons had cut him out of their criminal enterprise and began his frenzied whistleblowing campaign, he and Michael Roberts, for a brief time, enjoyed amicable relationship, which lasted up until October 28, 2011 (five days into TRACEY RICHTER's murder trial), when Michael Roberts refused to give DARREN MEADE money.

DARREN MEADE has told law enforcement and news media that back in 2010, Michael Roberts provided DARREN MEADE information that implicated him in Dustin Wehde's

murder and / or would serve to exonerate TRACEY RICHTER. For example, in his September 9, 2012, RIPOFF REPORT complaint No. 938843, DARREN MEADE claimed Michael Roberts showed DARREN MEADE the crime scene photographs back in 2010. However, as discussed earlier, according to e-mail communications between DARREN MEADE and his convicted felon partner, ADAM ZUCKERMAN, shows that DARREN MEADE did not even know about Dustin Wehde's murder until 2011.

TRACEY RICHTER's mother, ANNA RICHTER, and TRACEY RICHTER's fiancé, RUSSELL SCHERTZ, were aware of DARREN MEADE's aforementioned efforts, as DARREN MEADE copied them both in on his (DARREN MEADE's) e-mails to SCA Smith. Phone records show that both ANNA RICHTER and RUSSELL SCHERTZ communicated with DARREN MEADE before he (DARREN MEADE) provided the false information / evidence about Michael Roberts to SCA Smith. Most telling, however, is that in August 2011, RUSSELL SCHERTZ, and possibly ANNA RICHTER, believed DARREN MEADE to be "unstable" and crazy, and planned to use Michael Roberts's then-amicable association with DARREN MEADE against Michael Roberts in TRACEY RICHTER's custody proceedings. In fact, on or around August 26, 2011, RUSSELL SCHERTZ and TRACEY RICHTER discussed DARREN MEADE's February 2011 e-mails to convicted felon ADAM ZUCKERMAN, in which DARREN MEADE threatened to use a 9mm to intimidate Michael Roberts' employee with a 9mm pistol and suggested that he and his other felonious partners should publicly accuse Michael Roberts of child molestation and attempting to kill TRACEY RICHTER all for the purpose of pressuring and intimidating Michael Roberts into surrendering his company. Despite knowing where DARREN MEADE had been and what he was capable of doing, RUSSELL SCHERTZ, ANNA RICHTER, TRACEY RICHTER, and others provided DARREN MEADE with information and documents knowing he planned to use the same to attack the State's witnesses on RIPOFF REPORT.

There is only one reason why DARREN MEADE would provide false exculpatory evidence to the prosecutor responsible for convicting TRACEY RICHTER is that it be used in TRACEY RICHTER's then-pending direct appeal, and subsequent PCR to obtain a new trial. The specific allegations DARREN MEADE made against Michael Roberts in his communications to SCA Smith, if not pure fiction, would / could undermine the / a juries' decision to convict TRACEY RICHTER for murder.

#### SOLICITATION

A person solicits another person to commit a felony or aggravated misdemeanor when the person commands, entreats, or otherwise attempts to persuade the other person to commit a particular felony or aggravated misdemeanor, with the intent that such act be done and

under circumstances which corroborates that intent by clear and convincing evidence. A person who solicits another person to commit a felony of any class commits a class "D" felony. A person who solicits another person to commit an aggravated misdemeanor commits an aggravated misdemeanor. IOWA CODE § 705.1 (2013)

It would be easier to list the phone and prison conversations between TRACEY RICHTER and ANNA RICHTER in which TRACEY RICHTER did not solicit ANNA RICHTER and others to commit and / or aid and abet an indictable offense and / or conspire to do the same in some way or another.

#### ONGOING CRIMINAL CONDUCT

It is unlawful for a person to commit, or conspire to commit specified unlawful activity as defined in section 706A.1. IOWA CODE § 706A.2(4) (2013). "Specified unlawful activity" means any act, including any preparatory or completed offense, committed for financial gain on a continuing basis, that is punishable as an indictable offense under the laws of the state in which it occurred and under the laws of this state. IOWA CODE § 706A.1(5) A person who engages in "Specified unlawful activity" commits a class "B" felony. IOWA CODE § 706A.4 (2013). The maximum sentence for any person convicted of a class "B" felony shall be confinement in prison for no more than twenty-five years. IOWA CODE § 703.1 (2013)

All the above-mentioned crimes are indictable offenses. The following demonstrates said crimes were committed for financial gain on a continuing basis:

**DARREN MEADE has been obstructing the State's prosecution of TRACEY RICHTER and has been tampering with the State's witness beginning as early as January 2012, through as recently as June 2014, and has been paid by ED MAGEDSON / RIPOFF REPORT and ANNA RICHTER to do such.**

DARREN MEADE, along with others, from June 2010, through February 2011, embezzled over one million dollars from Progenex. Embezzlement or theft is punishable as an indictable offense under the laws of the state of California and Iowa. IOWA CODE 714.1 (2013)

Information obtained by law enforcement coupled with DARREN MEADE's own admissions, including DARREN MEADE's May 9, 2012, e-mail to SCA Smith in which he wrote that he was receiving Supplemental Security Income (SSI) (proving he had a medical and financial obstacles preventing him from testifying before the Sac County Grand Jury), demonstrates that DARREN MEADE has been / is using the California Department of Healthcare Services (DHCS) (California Medicaid), which means he probable never disclosed the \$80,000-plus



paid to him by RIPOFF REPORT from December 2011 through April 2014, or the thousands of dollars paid to him by convicted felon ADAM ZUCKERMAN to harass and defame a witness online back in 2010. In a February 2, 2011, e-mail to one of his felonious partners, DARREN MEADE wrote the following: "An FYI, the reason I keep my pay and things under raps is that I lost health insurance when everything happened. In order to keep it I can never have more than \$800.00 in any bank account."

ED MAGEDSON / RIPOFF REPORT, as noted earlier in this affidavit, derive financial benefit and income by selling advertisement space on RIPOFF REPORT and through its "Corporate Advocacy Program" and its "Verified" program, both of which are expensive services provided solely by RIPOFF REPORT. An analysis of Ripoffreport.com revenue and bank records since 2011, suggests that between \$5,000 to \$10,000 per month worth of advertising is being provided by ED MAGEDSON / RIPOFF REPORT and DARREN MEADE to TRACEY RICHTER, ANNA RICHTER, and TRACEY RICHTER's followers. The real value of this advertising space could be considerably higher, but, absent a comprehensive accounting, only a baseline estimate can be provided.

As mentioned above, on January 8, 2013, ED MAGEDSON told private investigator Tina Church, "All I want.. I want to do is anything that helps free Tracey – I am willing to featuring articles and place advertisements for the cause on my website ([www.RipOffReport.com](http://www.RipOffReport.com)). Since September 9, 2012, ED MAGEDSON / RIPOFF REPORT inserted DARREN MEADE's RIPOFF REPORT complaint No. NUMBER as a "featured report" on all its 1.8 million webpages / complaints. While creating the above-mentioned RIPOFF REPORT complaint with journalist Glenn Puit, ED MAGEDSON told DARREN MEADE that Glenn Puit's complaint would not be published on RIPOFF REPORT as a featured report because it provided "NO BENEFIT TO RIPOFF REPORT." Thus, by negative implication, DARREN MEADE's September 9, 2012, RIPOFF REPORT complaint (No. 938843), and its rebuttals / add-on complaints, which has been a featured report on RIPOFF REPORT since September 9, 2012, benefit ED MAGEDSON / RIPOFF REPORT.

Additionally, information obtained by law enforcement shows that ED MAGEDSON / RIPOFF REPORT is using the buzz generated by his and DARREN MEADE RIPOFF REPORT complaints about the State's witnesses to raise money for TRACEY RICHTER's legal defense. Specifically, on February 28, 2014, during a prison visit, ANNA RICHTER told TRACEY RICHTER that one of her two new attorneys said TRACEY RICHTER and ANNA RICHTER needed to create a trust fund for the money donated to TRACEY RICHTER for her legal defense / Post Conviction Relief (PCR) proceedings, because the attorney did not want SCA Smith to garnish these funds. ANNA RICHTER said TRACEY RICHTER's attorney said she did not want SCA Smith to garnish these funds. Furthermore,

the evidence suggests that ED MAGEDSON hired a former RIPOFF REPORT attorney to help TRACEY RICHTER and ANNA RICHTER.

In Iowa “a public or private corporation, partnership, or other voluntary association shall have the same level of culpability as an individual committing the crime when any of the following is true: The conduct constituting the offense consists of an omission to discharge a specific duty or an affirmative performance imposed on the accused by law. The conduct or act constituting the offense is committed by an agent, officer, director, or employee of the accused while acting within the scope of the authority of the agent, officer, director or employee and in behalf of the accused and when said act or conduct is authorized, requested, or tolerated by the board of directors or by a high managerial agent. “High managerial agent” means an officer of the corporation, partner, or other agent in a position of comparable authority with respect to the formulation of policy or the supervision in a managerial capacity of subordinate employees.” IOWA CODE § 703.5 (2013)

The above-listed crimes were committed with the intent to produce detrimental effects within Iowa, and the subject(s) actions did produce detrimental effects within Iowa. Witness Tampering is an indictable offense. Iowa Code § 708.7(1) (2013); Iowa Code § 720.4 (2013); I.A. Const. art. I, § 11; IOWA CODE § 903.1(2) (2013); Iowa R. Crim. P. 2.4(2); IOWA CODE § 803.1 (2013)

After ED MAGEDSON / RIPOFF REPORT and DARREN MEADE learned that SCA Smith had their mobile phone records and DARREN MEADE’s deposition, which would have been around July 2012, and was actively investigating them for witness tampering, rather than cease and desist from their defamatory publications, a little over a month after learning of SCA Smith’s investigation, ED MAGEDSON / RIPOFF REPORT and DARREN MEADE intensified their criminal actions by publishing false information about the State’s witnesses and SCA Smith, with a photograph of SCA Smith on each of the 1.8 million RIPOFF REPORT pages as one of its “featured reports (which, according to ED MAGEDSON and DARREN MEADE, benefits RIPOFF REPORT),” which was done to intimidate SCA Smith into ending his investigation of RIPOFF REPORT employee / agent DARREN MEADE’s aforementioned ongoing criminal conduct and to manufacture a preemptive legal defense (i.e., that SCA Smith’s investigation of ED MAGEDSON / RIPOFF REPORT and DARREN MEADE was retaliatory in nature and in violation of their civil rights). **Ironically, the continuance and escalation of these deliberate actions created an undeniable duty compelling SCA Smith - the chief law enforcement officer of Sac County - to take decisive steps to terminate the malignant precedent that will be created by allowing the actions of not only these individuals, but potential imitators as well, to forever impair the efficient pursuit of criminal justice in Sac County.** Ignoring the obvious potential injury to our criminal justice

system would be a breach of SCA Smith's duties to the State's witnesses and the citizens of Sac County.

No greater threat to our criminal justice system exists than allowing convicted, incarcerated murderers (criminals), and their friends and family, to destroy the livelihoods and personal reputations of the people brave enough to testify against them in open court. Considering the foregoing, specifically, the extent to which these witnesses have been damaged socially and professionally by TRACEY RICHTER, ANNA RICHTER, DARREN MEADE, ED MAGEDSON and others, your applicant doubts few, if any of the State's witnesses, if given the option to do it again, would come forward and give full, accurate testimony against TRACEY RICHTER. In fact, many have expressed as much.

The information contained herein gives your applicant reason to believe that as TRACEY RICHTER's chances for a new trial decrease, the more drastic her and her family's and friends' actions will become. As mentioned above, TRACEY RICHTER and ANNA RICHTER have already identified the **WEAKEST** juror. Your applicant fears it is only a matter of time before the jurors who convicted TRACEY RICHTER will join the State's witnesses on RIPOFF REPORT or will face other like-retaliation.

#### SUMMARY OF RELEVANT TECHNOLOGY

Information contained in the electronic storage devices ("electronic files"), such as computers, iPads, smartphones, etc. can be recovered months or even years after it has been downloaded, deleted or viewed via the internet. Such information may include computer applications, images, text, programs, encryption routines and algorithms, or other data that may be decoded, reconstituted, or otherwise manipulated to produce, utilize, transmit, receive, encrypt, encode, or display such images, text, programs, encryption routines, and algorithms.

Electronic files downloaded to a hard drive | electronic storage device can be stored for years at little or no cost. Even when files have been deleted, they can be recovered months or years later using readily available forensics tools. This is so because when a person "deletes" a file on most electronic storage devices, the data contained in the file does not actually disappear; rather, that data remains until it is overwritten by new data. Therefore, deleted files, or remnants of deleted files, may reside in free space or slack space-that is, in space on the hard drive | digital storage device that is not currently being used by an active file-for long periods of time before they are overwritten. In addition, in many instances the operating system for a computer | digital storage device may also keep a record of deleted data in a "swap" or "recovery" file.

The Internet is a global network of computers and other electronic devices that communicate with each other. Files that have been viewed via the Internet are typically automatically downloaded into a temporary Internet directory or "cache." The internet browser often maintains a fixed amount of hard drive space devoted to these files, and the files are only overwritten as they are replaced with more recently viewed Internet pages or if a user takes steps to delete them.

An Internet Protocol address (or simply "IP address") is a unique numeric address used by computers on the Internet. An IP address looks like a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97. 178). Every computer attached to the Internet computer must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses. Some computers have static-that is, long-term-IP addresses, while other computers have dynamic-that is, frequently changed-IP addresses. Law enforcement can often find out a particular ISP using an IP address, and given the date and time the IP address was used, the ISP typically can identify the account holder by name and physical address.

Peer to peer file sharing ("P2P") is a method of communication available to Internet users through the use of special software. P2P software allows users to trade digital files through worldwide networks of computers. Several different software applications can be used to access these networks, but these applications operate in a similar manner. To access the P2P networks, a user first obtains the P2P software, which can be downloaded from the Internet. This software is used exclusively for the purpose of sharing digital files. When the P2P software is installed on a computer, the user is directed to specify a folder that will contain files available to anyone on the world wide network for download ("shared folder"). A user obtains files by conducting keyword searches of the P2P network. When a user initially logs onto the P2P network, a list of the files that the user is sharing is transmitted to the network. The P2P software then matches files in these file lists to keyword search requests from other users. A user looking to download files simply conducts a keyword search, and the results of the keyword search are displayed. The user then selects file(s) which he or she wants to download. The download of a file is achieved through a direct connection between the computer requesting the file and the computer(s) hosting the file. Once a file has been downloaded, it is stored in the area previously designated by the user and will remain there until moved or deleted. Most P2P software applications keep logs of each download event. A P2P file transfer is assisted by reference to an Internet Protocol (IP) address, which is a unique numeric address used by computers on the Internet.

Searching for information stored in computers often requires agents to seize most or all

electronic storage devices to be searched later by a qualified computer expert in a laboratory or other controlled environment. This is often necessary to ensure the accuracy and completeness of such data, and to prevent the loss of the data either from accidental or intentional destruction. Additionally, computers and other electronic storage devices can store the equivalent of millions of pages of information. Also, a suspect may try to conceal criminal evidence; he or she might store it in random order with deceptive file names. This may require searching authorities to peruse all the stored data to determine which particular files are evidence or instrumentalities of crime. This sorting process can take weeks or months, depending on the volume of data stored, and it would be impractical and invasive to attempt this kind of data search on-site. For all the reasons discussed in this numbered paragraph, your applicant requests permission to copy the hard drive(s) or its equivalent for each of the electronic storage devices seized from ANNA RICHTER's residence.

Searching computer systems for criminal evidence sometimes requires highly technical processes requiring expert skill and properly controlled environment. The vast array of computer hardware and software available requires even computer experts to specialize in some systems and applications, so it is difficult to know before a search which expert is qualified to analyze the system and its data. In any event, however, data search processes are exacting scientific procedures designed to protect the integrity of the evidence and to recover even "hidden," erased, compressed, password-protected, or encrypted files. Because computer evidence is vulnerable to inadvertent or intentional modification or destruction (both from external sources or from destructive code imbedded in the system as a "booby trap"), making copies of the hard drives of the electronic storage devices may be necessary to safeguard against any loss (inadvertent or otherwise) as a result of the foregoing.

Searching computer systems for the evidence described below may require a range of data analysis techniques. In some cases, it is possible for agents and analysts to conduct carefully targeted searches that can locate evidence without requiring a time-consuming manual search through unrelated materials that may be commingled with criminal evidence. In other cases, however, such techniques may not yield the evidence described in the warrant. Criminals can mislabel or hide files and directories, encode communications to avoid using key words, attempt to delete files to evade detection, or take other steps designed to frustrate law enforcement searches for information, such as deleting web browser history. These steps may require agents and law enforcement or other analysts with appropriate expertise to conduct more extensive searches, such as scanning areas of the disk not allocated to listed files, or peruse every file briefly to determine whether it falls within the scope of the warrant. In light of these difficulties, the DCI intends to use whatever data analysis techniques appear necessary to locate and retrieve the evidence described

below.

Dropbox is a file hosting service operated by Dropbox, Inc., headquartered in San Francisco, California, that offers cloud storage, file synchronization, and client software. Dropbox allows users to create a special folder on each of their computers, which Dropbox then synchronizes so that it appears to be the same folder (with the same contents) regardless of which computer is used to view it. Files placed in this folder also are accessible through a website and mobile phone applications.

The Dropbox client enables users to drop any file into a designated folder that is then synchronized with Dropbox's Internet service and to any other of the user's computers and devices with the Dropbox client. Users may also upload files manually through a web browser.

Dropbox client supports synchronization and sharing along with personal storage. It supports revision history, so files deleted from the Dropbox folder may be recovered from any of the synced computers. Dropbox supports multi-user version control, enabling several users to edit and re-post files without overwriting versions. The version history is paired with the use of delta encoding technology. When a file in a user's Dropbox folder is changed, Dropbox only uploads the pieces of the file that are changed when synchronizing, when possible.

Your affiant has been a Dropbox account holder for over 2 years and knows that registering and using the Dropbox is facilitated almost by the Dropbox Inc. account holder's email account. Your affiant is aware of only one email account used by ANNA RICHTER, which is the YAHOO! Inc. email address identified above.

In my research and experience, I have learned that YAHOO! INC. provides a variety of on-line services, including electronic mail ("email") access, instant messaging, and other electronic communication services to the general public. Subscribers obtain an account by registering with YAHOO! INC.. During the registration process, YAHOO! INC. asks subscribers to provide basic personal information. Therefore, the computers of YAHOO! INC. are likely to contain stored electronic communications (including retrieved and non-retrieved email for YAHOO! INC. subscribers) and information concerning subscribers and their use of YAHOO! INC. services, such as account access information, email transaction information, and account application information.

As discussed earlier, ANNA RICHTER has / had a YAHOO! INC. e-mail account (anna\_richter2003@yahoo.com), which she had used as recently as May 17, 2014, and that search warrant for all e-mails in the account issued to YAHOO! INC. returned nothing. In general, an email that is sent to a YAHOO! INC. subscriber is stored in the subscriber's

"mail box" on YAHOO! INC. servers until the subscriber deletes the email. If the subscriber does not delete the message, the message can remain on YAHOO! INC. servers indefinitely. When the subscriber sends an email, it is initiated at the user's computer, transferred via the Internet to YAHOO! INC.'s servers, and then transmitted to its end destination. YAHOO! INC. often saves a copy of the email sent. Unless the sender of the email specifically deletes the email from the YAHOO! INC. server, the email can remain on the system indefinitely.

Instant messaging (IM) is a type of online chat which offers real-time text transmission over the Internet where short messages are typically transmitted bi-directionally between two parties, when each user chooses to complete a thought and select "send."

A YAHOO! INC. subscriber can also store files, including emails, address books, contact or buddy lists, pictures, and other files, on servers maintained and / or owned by YAHOO! INC.. As per YAHOO! INC. policy, chat history including IP address information (logging) is stored on YAHOO! INC. servers.

Subscribers to YAHOO! INC. might not store on their home computers copies of the emails stored in their YAHOO! INC. account. This is particularly true when they access their YAHOO! INC. account through the web, or if they do not wish to maintain particular emails or files in their residence.

In general, email providers like YAHOO! INC. ask each of their subscribers to provide certain personal identifying information when registering for an email account. This information can include the subscriber's full name, physical address, telephone numbers and other identifiers, alternative email addresses, and, for paying subscribers, means and source of payment (including any credit or bank account number).

Email providers typically retain certain transactional information about the creation and use of each account on their systems. This information can include the date on which the account was created, the length of service, records of log-in (i.e., session) times and durations, the types of service utilized, the status of the account (including whether the account is inactive or closed), the methods used to connect to the account (such as logging into the account via YAHOO! INC.'s website), and other log files that reflect usage of the account.

In addition to the foregoing, email providers often have records of the Internet Protocol address ("IP address") used to register the account and the IP addresses associated with particular logins to the account. Because every device that connects to the Internet must use an IP address, IP address information can help to identify which computers or other devices were used to access the email account.

Further, in some cases, email account users will communicate directly with an email service provider about issues relating to the account, such as technical problems, billing inquiries, or complaints from other users. Email providers typically retain records about such communications, including records of contacts between the user and the provider's support services, as well records of any actions taken by the provider or user as a result of the communications.

A search warrant issued to YAHOO! INC. on May 23, 2013, for e-mails in ANNA RICHTER's yahoo e-mail account returned nothing (i.e., as of May 23, 2013, there were no e-mails for anna\_richter2003@yahoo.com stored on YAHOO! INC. servers), which suggests she has downloaded them from Yahoo! Inc.'s servers, onto her computer.

SIGNED and DATED July 7<sup>th</sup> 2014.



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BEN SMITH  
SAC COUNTY ATTORNEY



IN THE IOWA DISTRICT COURT IN AND FOR SAC COUNTY  
(Magistrate Division)

IN THE MATTER OF AN APPLICATION FOR A SEARCH WARRANT FOR THE RESIDENCE AT 4221 155 <sup>TH</sup> STREET, URBANDALE, IOWA 50323	SEARCH WARRANT APPLICATION: ATTACHMENT A
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PLACES AND THINGS TO BE SEARCHED BY THE GOVERNMENT

This warrant applies to information associated with the following items and their (digital) contents located at ANNA RICHTER's residence at 4221 155<sup>TH</sup> STREET, URBANDALE, IOWA 50323, all computers, portable hard drives, data DVDs, USB flash drives (**NOT TO INCLUDE** mobile phones / smartphones) and the digital files, folders, and other digital documents / information contained in said items.

IN THE IOWA DISTRICT COURT IN AND FOR SAC COUNTY  
(Magistrate Division)

IN THE MATTER OF AN APPLICATION  
FOR A SEARCH WARRANT FOR THE  
RESIDENCE AT 4221 155<sup>TH</sup> STREET,  
URBAN DALE, IOWA 50323

SEARCH WARRANT APPLICATION:  
ATTACHMENT B

ITEMS AND INFORMATION TO BE SEIZED BY THE GOVERNMENT

All information contained on the electronic storage devices, computers (laptops or towers), flash drives (USB drives), data DVDs, described in Attachment A and to seize information contained in said electronic storage devices that constitute fruits, evidence, and instrumentalities of the criminal violations outlined in the Affidavit to the Search Warrant Application ("Affidavit"), which is attached hereto and is incorporated herein by reference. Specifically, and among other things, law enforcement shall seize any and all communications to or from the individuals identified in the Affidavit that concern or relate to the crimes alleged in the Affidavit, and all documents, records, communications, correspondence, notes, e-mails, addresses or contacts, text messages, instant messages, chats, Internet history, records of internet activity, time indicators, text message logs, instant message logs, other logs, user profiles for social media, visual depictions, audio files, and all other data relating to the crimes and conduct alleged in the Affidavit, including but NOT limited to the information listed below, as well as and all evidence capable of demonstrating or leading to further discovery of the same information:

1. All files and information contained in any and all of the electronic storage devices that were discussed / mentioned by ANNA RICHTER and the other individuals or that relate to the crimes and conduct alleged in the Affidavit, including any such files located in a Dropbox or similar program / file on any of the electronic storage devices, used to transfer / store documents and other information between ANNA RICHTER and ED MAGEDSON / RIPOFF REPORT, DARREN MEADE and the others named / described in the Affidavit.

2. All e-mail communications between ANNA RICHTER and the individuals identified in the Affidavit, which relate to and / or corroborate the facts contained in the Affidavit and / or that are described or specifically identified in the Affidavit. Said e-mail

communications shall include those mentioned in the Affidavit and / or those which relate to the crimes and conduct alleged in the Affidavit.

2014 JUL -9 AM 8: 09

IN THE IOWA DISTRICT COURT IN AND FOR SAC COUNTY

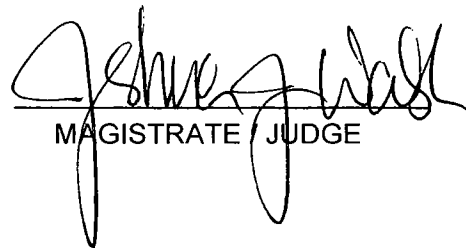
(Magistrate Division)

IN THE MATTER OF AN APPLICATION  
FOR A SEARCH WARRANT FOR THE  
RESIDENCE AT 4221 155<sup>TH</sup> STREET,  
URBANDALE, IOWA 50323

ENDORSEMENT ON SEARCH WARRANT  
APPLICATION

This matter came before the Court on the government's search warrant application. In issuing the search warrant, the undersigned relied upon the sworn testimony of Sac County Attorney Ben Smith, together with the statements and information contained in the application and any attachments thereto, and finds such information demonstrates probable cause, and therefore, I do issue the warrant.

9:43 pm 7/9/14  
TIME DATE

  
MAGISTRATE JUDGE