#### IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS COUNTY DEPARTMENT, LAW DIVISION

LEONARD COLDWELL,	)	
Plaintiff,	)	Case No. 2014–L–001337
,	)	
V.	)	
	)	Judge Lynn M. Egan
OMRI SHABAT, JASON MICHAEL JONES	)	
	)	
Defendants.	)	

#### **MEMORANDUM IN SUPPORT OF DEFENDANT'S MOTION FOR SANCTIONS**

#### **TABLE OF AUTHORITIES**

#### CASE LAW

Gertz v. Robert Welch, Inc., 418 U.S. 323 (1974)

Krautsack v Anderson, 329 Ill.App.3d 666, 768 N.E.2d 133 (1st Dist. 2002)

*Marvel of Illinois, Inc. v Marvel Contaminant Control Industries, Inc.*, 318 Ill.App.3d 856, 744 N.E.2d 312 (2nd Dist. 2001)

New York Times Co. v. Sullivan, 376 U.S. 254 (1964)

In re Schneider, 298 Ill.App.3d 103, 697 N.E.2d 1161 (1st Dist. 1998)

Sterdjevich v RMK Corp., 343 Ill.App.3d 1, 796 N.E.2d 1146 (1st Dist. 2003)

Whitmer v Munson 335 Ill.App.3d 501, 781 N.E.2d 618 (1st Dist. 2002)

Wren v. Feeney, 176 Ill.App.3d 364, 531 N.E.2d 155 (3rd Dist. 1988)

#### **STATUTES AND RULES**

735 ILCS 5/13-201

Ill. Sup. Ct. R. 137

NOW COMES defendant JASON MICHAEL JONES (hereinafter "Jones"), *pro se*, and respectfully requests that the Court consider the following arguments in support of Jones' motion to sanction Plaintiff Leonard Coldwell (hereinafter "Plaintiff") and his attorney Dennis J. Kellogg for filing a frivolous and unreasonable pleading for the purpose of harassment, pursuant to Illinois Supreme Court Rule 137.

#### FACTUAL BACKGROUND

Defendant Jones, a non-practicing Illinois attorney, is an online activist and victim advocate who publishes the fraud-exposing parody website saltydroid.info (hereinafter "SaltyDroid"). In August and September 2012, while a resident of Illinois, Jones published a series of articles exposing Plaintiff's lack of proper medical credentialing (attached as Exhibit A), and revealing his secret history of flagrant sexual predation (attached as Exhibit B).

Plaintiff failed to answer any factual queries posited to him by Jones, and other than making repeated public and private statements regarding his intention to use the legal system to bankrupt Jones and leave him to "eat dog droppings" (attached as Exhibit C), made no attempt to formally respond to the allegations set forth by Jones in the SaltyDroid articles. Plaintiff did not request a retraction, nor did he point to any factual inaccuracies or misstatements made by Jones.

In February through April 2013, Omri Shabat, a citizen and resident of Israel, authored several articles regarding Plaintiff (attached to Plaintiff's Complaint as Exhibits A–D) and published them to glancingweb.com, a website which is owned and operated by Mr. Shabat, and is registered under his legal name and address. Each of the four articles cited in Plaintiff's Complaint have an Omri Shabat byline, and none mention Jones or SaltyDroid directly.

2

The present suit was brought by Plaintiff in February 2014, naming Jones, by this time an Ohio resident, as the defendant, but citing exclusively the alleged defamatory content contained on Omri Shabat's glancingweb.com. Plaintiff then used the filed complaint as a platform from which to boast about his ability to use the legal system, not for the recovery of damages suffered, but for the illegitimate purpose of destroying the lives and finances of those who would dare to criticize him and his unlawful, morally repugnant acts (attached Exhibits C–H).

#### ARGUMENT

The legal system should not be a weapon wielded by wrongdoers in the face of wellmeaning whistle-blowers, stifling important discussion about matters of public concern, though too often, that is exactly how our system is used. There can be few better examples of suits interposed for improper purposes than the present frivolous and unreasonable Complaint brought by Plaintiff.

"The purpose of sanctions under Rule 137 is to prevent the filing of false or frivolous lawsuits." *Krautsack v Anderson*, 329 Ill.App.3d 666, 683, 768 N.E.2d 133, 148 (1st Dist. 2002). Illinois Supreme Court Rule 137 provides, in pertinent part:

[T]o the best of [the signatory's] knowledge, information, and belief formed after reasonable inquiry it is well grounded in fact and is warranted by existing law or a good-faith argument for the extension, modification, or reversal of existing law, and that it is not interposed for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation.

Plaintiff's Complaint at Law for Defamation *Per Se* fails to satisfy any of the requirements of Rule 137. It is not well grounded in fact; it is not warranted by existing law; and it was interposed in bad faith purely for the purpose of harassment. The Court should impose sanctions on the Plaintiff and on his attorney Dennis J. Kellogg.

#### 1. Plaintiff's pleading is not well grounded in fact

Plaintiff's pleading is not "well grounded" in fact. In fact, it is not factual at all. It blatantly misstates the fundamental aspects of the case, including:

- i. Jason Michael Jones and Omri Shabat are two separate and distinct people. There is no reasonable basis to claim otherwise and Plaintiff has pled no facts to substantiate his claim that they are one and the same. Attorneys are obligated to investigate the facts underlying a pleading before filing it. *In re Schneider*, 298 Ill.App.3d 103, 108-09, 697 N.E.2d 1161, 1165 (1st Dist. 1998). One phone call, or email, is all the "investigation" that would have been required to reveal the truth in this instance.
- ii. Jones does not publish glancingweb.com, and has never written anything for glancingweb.com. Plaintiff claims otherwise without basis.
- iii. Neither Jones nor Omri Shabat is a current resident of Illinois. Plaintiff and his attorney may have had reason to believe that Jones, a former Chicago resident, was still residing within the state. But that belief would not obviate the obligation to conduct a reasonable inquiry. "We have held that, even where the initiating party 'honestly believed' his or her case was well grounded in fact or law," it is still unreasonable to file the suit if its falsity could have been uncovered through reasonable inquiry." *Whitmer v Munson* 335 Ill.App. 3d 501, 512, 781 N.E.2d 618, 631 (1st Dist. 2002)

- iv. Assuming, *arguendo*, that Plaintiff had stated a claim for which relief may be granted, then Plaintiff's assertion within his Complaint at Law for Defamation *Per Se* that he is "board certified in the United States as Dr. of Naturopathic Medicine (NMD)," or that he is a "clinician," would be at central issue to determining whether some of the alleged defamatory statements were actionable or privileged. Jones has repeatedly, and long predating the present action, requested substantiation of those "board certified" claims to no avail. If facts exist to support those claims, they should have been pled with specificity. If such facts do not exist, Plaintiff's malfeasance is manifest.
- v. Ten days after Plaintiff filed the present suit in this court, he began publicly boasting of its existence to followers of his Facebook account (attached as Exhibit D). During the course of that boasting, Plaintiff, rather crudely, signaled his actual knowledge that Jones and Shabat are two distinct individuals: "I will have a cool video done about all the back grounds of the slut, the gay, the mental retard and the gay Jew and the fake wanna be lawyer." Plaintiff refers to Mr. Shabat repeatedly as the "gay Jew," and to Jones as the "fake wanna be lawyer."

Pleading allegations that could easily have been revealed as false upon reasonable inquiry is sanctionable. *Sterdjevich v RMK Corp.*, 343 Ill.App.3d 1, 21, 796 N.E.2d 1146, 1162 (1st Dist. 2003). There was no reasonable inquiry in this case, and Plaintiff and his attorney should be sanctioned on that ground alone. But as the appeals court stated in *Whitmer v Munson*, when holding that the trial court had abused its discretion in failing to grant Munson's motion for sanctions: "Whitmer initiated a lawsuit based on facts that he had to have known were false. If it could be unreasonable to file a suit based on an 'honest belief,' then it certainly would be

5

unreasonable to file a suit with proven knowledge that the allegations pled are false." See *Whitmer*, 781 N.E.2d 618 at 631.

#### 2. Plaintiff's pleading is not warranted by existing law

Illinois courts have long held that sanctions are appropriate in cases where a complaint is filed based upon claims that are barred by the statute of limitations. *Wren v. Feeney*, 176 Ill.App. 3d 364, 365, 531 N.E.2d 155, 155-56 (3rd Dist. 1988). All of the contentious statements published by Jones on SaltyDroid regarding Plaintiff's complete lack of professional qualifications; his fraudulent business practices; or those statements revealing Plaintiff's proclivity for what, in a just society, might be described as serial rape, fall well outside the one year statute of limitations provided for claims of defamation by 735 ILCS 5/13-201.

In a further sign of the careless and frivolous manner in which this complaint was filed by Plaintiff and his attorney Dennis J. Kellogg, Plaintiff actually pleaded his status as a "public figure" in his complaint, thereby raising his own burden of proof in the case to that of actual malice. *Gertz v. Robert Welch, Inc.*, 418 U.S. 323 (1974). *New York Times Co. v. Sullivan*, 376 U.S. 254 (1964). After heightening his own burden, Plaintiff then proceeds to plead not a single fact that would tend to show that Jones acted with the requisite "reckless disregard" for the truth. In failing to plead sufficient facts to support each of the required elements of his claim, Plaintiff brings a sanctionable pleading that is objectively unwarranted by existing law.

#### 3. Plaintiff's pleading interposed for an improper purpose

For proof of Plaintiff's improper purpose in bringing the present complaint, we need look no further than the Plaintiff's own public speech during the pendency of this frivolous action:

6

- i. "So funny he is begging my lawyer for mercy as I understand his email showing how scared he is." (See Exhibit E, attached.)
- ii. "[A]ll of them will not just give me everything they own via civil suet they all will go to federal prison." (See Exhibit D, attached.)
- iii. "I am taking bets: I bet Jason the Droid will never ever post anything like his former posts about me again! Any takers? I heard he is hiding at his cheap home sh..g his pants and biting his finger nails and wishes he would never messed with me. One down a few more to go." (See Exhibit F, attached.)
- iv. "I will finish everybody that messed with you and when my lawyers have him on the ground, they will make sure they finish him lawfully up. Everybody ever messing with me should know that I never ever lost a fight in my life and see what it says on my website: 'I will not start the fight -- but I will finish it.' One done a few more to go." (See Exhibit G, attached.)

Add the preceding public posts to the following statements made to Jones via an email dated February 27th, 2014, and the harassing purpose behind Plaintiff's frivolous filing becomes abundantly clear. (See Exhibit H, attached.)

- a. "And in the 3 Civil cases against you: ( do you think Dr C is the ONLY one suing you, sister? Wrong!) Proven losses in amounts you will never even accumulate in your lifetime will make you work for Dr C for the rest of you miserable life."
- b. "We will have so much fun collecting and taking every dime you have and ever will have via the court system. NOW you are in OUR world of games!"

- c. "Let us know when the posts are gone because sister, every time someone links to them its a new case and crime as our lawyers stated. Happy drowning in your own feces."
- d. "Oh honey puff we and our lawyers will have such a field day with you in court.
  ( and jail) Nothing will be left Look at Trudeau he messed with us and see what happened? Watch what our lawyers do after you lost it all in court and are off to jail."

#### CONCLUSION

Much judicial ink is spilled opining about the possible "chilling effect" that a given piece of legislation, or legal precedent, might have on the marketplace of ideas. But as the speech function of the fourth estate has become increasingly diffuse, with modern technologies removing most of the traditional barriers to publishing and public participation, the vanguard in the fight for the free exchange of ideas has moved from the newsroom to the living room. It is the constant threat of frivolous, and prohibitively expensive, litigation that is of principal concern for the individual citizen journalist without access to media lawyer representation.

Plaintiff does not plan, and does not need, to litigate his frivolous and factually inaccurate claims to their conclusion. Had he wanted a legal fight with Jones, he could have filed this claim in a timely fashion. Rather, Plaintiff wants to create the illusion that he is willing to sue a notoriously uncompromising activist, to send a message to other would-be whistle-blowers, and to the victims of his sexual manipulation, that there may be dire consequences for their truthful speech. The Court should not allow Plaintiff, nor his attorney, to use the judicial system for this

sorry game against the public interest. Leonard Coldwell and Dennis J. Kellogg should be sanctioned.

"Plaintiffs must understand that using the legal system for sport or harassment carries a price." *Marvel of Illinois, Inc. v Marvel Contaminant Control Industries, Inc.*, 318 Ill.App.3d 856, 868 744 N.E.2d 312, 322 (2d Dist. 2001).

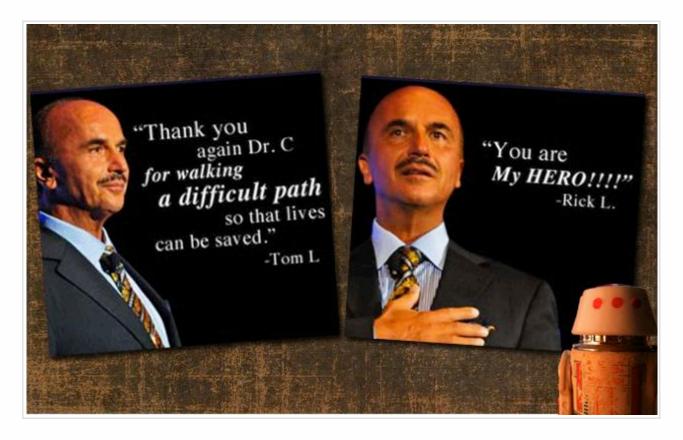
Respectfully submitted,

Jason Michael Jones, Esq.

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### Darker than the DarkSide

by Sd • Aug. 30, 2012 • 4 min read • original



**Dr. Leonard Coldwell** is not a doctor :: he's not a Leonard Coldwell even ... he's NotDoctor Bernd Klein ... the pervy little disgrace of Germany. Bernd's mother Gerda :: knowing immediately what rot she hath wrought ... tried to kill herself by swallowing too much hepatitis. But Bernd was an imaginary doctor even in his youths :: and he saved mommy dearest from herself ... as he tells in one of the most ridiculous examples of fraudulent biography on all of the interwebz ...

Discovering his gifts at a very early age, he single-handedly cured his own mother from Hepatitis C, Liver Cirrhosis, and liver cancer – a near impossible feat since she had been given a diagnosis of a terminal state and a prognosis of only 6 months to live.

Hold still mommy :: baby Bernd is just palpating your sick livers ... nothing weird ... just some single handing.

Throughout Dr. Coldwell's successful career, he has to date, cured over 35,000 cancer patients (studies have proven a 92.3% cancer cure rate).

Okay :: nope ... lies ... lies so stupid there could be no stupider lies ... oh ... wait ...

Dr. Coldwell is the most endorsed and integrated natural Doctor in the world, having earned 4 doctor degrees and 4 PHDs.

What the hell is a "doctor degree" :: I guess I'd know if I had four PHDs ... or maybe one Ph.D.

In spite of these :: impressively fake :: fake credentials ... Leonard Coldwell was never able to make much of himself. Just another faker in a sea of fakers. Maybe it's his creepy dirty old man vibe :: or the str8 from porn mustache :: or the sunken black eyes ... but peeps just weren't that into Leonard. Or as he modestly puts it ...

19 times Mega Bestselling author, the world's leading authority for Cancer cures based on independent studies performed and substantiated by the Dr. Hohn Institute for medical research, with an historical cancer cure rate of 92.3%, and with over 3.4 million seminar attendees plus over 57 million readers ... When live on each program he generates an average 280,000 email responses from folks requesting information.

Totally :: but seriously ... nobody had ever heard of this stupid little fucker.

Then came Kevin Trudeau circa 2005. Trudeau was using a popular lead gen book :: infomercials ... and every other trick in the Scamworld book "they" don't want you to know about to separate people from their money ... writ large. Trudeau made fake doctor Lenny Coldwell his Bteam bitch :: that changed things for Coldwell ... and they've been together unhappily ever after.

With leads coming in from KT's bullshit :: Coldwell could focus on manipulation and exploitation ... which is far easier than generating the initial leads. Lenny needs easy jobs :: because he's dumb ... and he

sucks at stuff.

A Salty Droid Dateline 60 minutes 4 PHDs exclusive investigation has revealed that Leonard Coldwell set up remote servers with family in Germany in order to process email leads generated by Kevin Trudeau's fraudulent activities. Leonard would reply to emails as "Dr. Hohn" {*who is a real person ... and actual doctor*} ... and refer victims to his own products.

Such elaborate measures were prolly required because America's Federal Trade Commission was crawling up the ass of Trudeau's operation. I suspects they even sniffed out this fake Dr. Hohn situation. But they suck :: so they accomplished jackshit ... and Trudeau and Coldwell scam on unabated.

B-team bitch Leonard Coldwell at his side :: Trudeau moved on to the not next not big thing ... MLM.

His Global Information Network is an MLM based "club" where you deposit all your money :: and all the money of any friends or family you can successfully pressure pitch :: in the "club" until you reach the Level 5 Inner Council and Xenu clears all your thetans.

Or something :: who cares? :: GIN failed ... cause like fellow anti-scam crusader Dr. Jon Taylor recently told The New York Observer regarding MLM funtime disaster WorldVentures ...

"A good MLM is really an oxymoron."

But before GIN started to finish imploding like all MLMs always do :: totally unqualified to do anything sack of shit Leonard Coldwell was making good money suckling on Kevin's pasty white scam teets. Keven Trudeau **made** "Dr." Leonard Coldwell :: so it was a highly unorthodox violation of Scamworld protocol when Coldwell started publicly shitting on his scam mommy ...

It is as I believe a bankrupt club that was a good idea and got killed by greed and fraud! as I personally believe and the owner is still sucking people out with deception lies and fraudulent, false and deceptive advertisement as I believe. A lot of people seem to go to jail for fraud as my lawyers believe... It turned into a cult for many idiots, losers or simply deceived people, that put all there money into it and quit their job and now are still trying to keep this club of fraud and deception ( as many believe it is ) alive.

Harsh words :: fucking illiterate as I and my lawyers believe :: but harsh ... please continue with your 4 doctor degrees of mouth talking ...

They gave 50 000 or even 75 000 dollars and did not even know what they bought, it looks like that they had no contracts and I am sure they lose their money I am am sure the club is gone latest at the beginning of next year. The owner goes to jail soon as we all believe and he does not have the 37 million dollars (maybe 40 million with interest) that he has to pay in court fine as he told me. So the usual Jones town mentality with their inner circle and level 5 brainwashed cult followers.

Gosh :: somebody's as mad as he is bald ... and daft. Comparing an Ateamer like KT to Jonestown is a Scamworld career ending mistake ... because it's way too close to truth. In private? Sure no probs :: tear your shirt off while blaspheming L. Ron Hubbard :: throw some plates ... and give it to Karl up the ass. But on The Facebook? Oh no you didn't!

The funniness of that fuck up :: together with @CosmicConnie's long time whirled interest in these goon bags ... got my attention.

I believe :: if you're a rotten to the core psycho prick with the worst kind of evil secrets to hide ... you don't want my attention ... as I believe.

Oh well ... too late.

Hi Leonard/Bernd :: I'm The Salty Droid ... and I know your fucking secret you worthless piece of shit.

The horror that is you :: is finally going to allow me to turn the light onto the darkest of Scamworld dark spots ... the rampant sexual exploitation and sexual abuse of vulnerable women {*and women too young to be called women*}.

Anywayz Leonard :: as I said to non-woman Spider Naomi Dunford this time last year ... at the beginning of that important and inflammatory sequence ...

... we just started a game that you're going to lose ... so badly.

#### >> bleep bloop

**Original URL:** http://saltydroid.info/darker-than-the-darkside/

# Exhibit A

### Dr. Leonard Coldwell's HandsOn Healing

by Sd • Sept. 6, 2012 • 8 min read • original



**Lying** is how assholes get sex. Most people won't have sex with an asshole on purpose :: so assholes have evolved various guises and disguises to cloak their wretched stink from nice people for just long enough to steal a one night stand ... or a short and ill-fated marriage that your mother totally tried to warn you against but you wouldn't listen because he said he wanted to start an orphanage someplace fucking awful ... like New Jersey.

It's not cool {*or okay even*} to lie someone out of their pants :: but the whole pick-up artist "industry" is basically built on it ... and in most states and countries it's not a crime to check your decency at the door of the club and transform yourself into Art Vandelay ... successful plastics professional.

Rape statutes in America tend to require both a lack of consent ... and old-school force. Rape by fraud or manipulation :: while clearly a real thing that's happening all the time ... isn't seen as a real thing by governments wary of regulating messy interpersonal complexities.

In this new century information is power :: and words are force more often than force is force ... but most of our laws were written for a less complex world that no longer exists. In the absence of responsive and adaptive government :: and partially consequent of our continued societal refusal to admit that manipulation is possible  $\{/easy\}$  ... exists a festering black hole of unchecked darkness.

"Leonard never held me down, but he made me think I had to do what he said."

... reported one of the victims of "Dr." Leonard Coldwell to South Carolina's Mount Pleasant Police Department.

In 2007 :: after two women came into the police station complaining about suffering strikingly similar sexual abuse at the not clean hands of NotDoctor Coldwell ... Mt. Pleasant's Detective Willis opened an investigation into Coldwell's dubiousness ... and found it.

This is the initial incident report ...



Forcible Fondling Incident Report.pdf

... written up by the patrolman under "forcible fondling." Extensive notes and details from the investigation followed :: which I'm going to discuss but not post ... for obvious reasons. And I've started my own investigation :: which I'm going to discuss but not reference in specific ... for obvious reasons.

Doctor Doctor Doctor Coldwell :: who's totally not a doctor ... had some super-duper audio tapes that could help cure you of whatever ailment you happened to have ... or even the ones you didn't happen to have. On the tapes a creepy German douche tells you to relax over the relaxing sounds of the beach :: or the wind ... or the sitar ... or something else not distracting enough to distract you from the sound of a creepy German douche telling you to relax.

For a time pervy Lenny had a "treatment room" as part of a hippie altmed type shop outside of Charleston :: but he later moved it to the upstairs bedroom of a condo he shared with his former {*much exploited*} girlfriend and business partner ... because he's classy like that.

It wasn't just customers of Coldwell's fake services that had their lives totally changed by a series of visits to the treatment room :: it was employees ... friends ... commercial contacts ... people from local shops ... part-time contractors. Any lady/girl who got close to Leonard seemed to be a potential target.

The following horror story is Leonard Coldwell's basic M.O. :: compiled from the statements of more victims than you can count on your fingers :: the details are merged to protect the innocent ... "I had been told by people who I trusted that Dr. Coldwell was a worldrenowned expert on cancer, and on the other diseases caused by stress — which according to Dr. Coldwell is most diseases. Dr. Coldwell rarely has time to see patients and do treatments what with all his important speaking engagements and book writing.

I was flattered that an expert like Leonard had offered to give me personal treatments, but something about it didn't feel quite right and I declined the initial offer. During later discussions with Dr. Coldwell that I felt obligated to have ... I disclosed some things about my personal life and health that I wish now I hadn't. Dr. Coldwell had a way about him that made you want to tell him things ... but then he used those things against you.

As the offers for treatment became more persistent, my resistance weakened. I did have serious problems with my health/mind and I wanted to believe in healing. I wanted Dr. Coldwell to like me, his public displays of affection were quite flattering, and perhaps useful to my career in the self-help industry. He seemed to be very financially successful, so he must be doing something right, and I was frightened by some of the things he told me about my health. I didn't even know I had cancer ... but Dr. Coldwell is an expert so he must know.

When we went into the treatment room he told me to take off all my clothes. This made me very uncomfortable and I protested, but Dr. Coldwell insisted that it was necessary for my healing. If I wanted to get better I'd need to let go of my hang ups and trust him. He's a doctor ... so I took off my clothes and got on the treatment table as instructed.

Dr. Coldwell proceded to massage my lymph nodes to drain them of their acidity and renew my energy levels. Most of my problem lymphs seemed to be in the breast and pelvic regions. I think he could tell that the genital massage was making me very uncomfortable and he stopped. He said he was surprised by my stress levels. My treatment had really drained him energetically and he'd need to rest before the next treatment. But I absolutely would need another treatment because Dr. Coldwell had sensed very bad things about my health ... even worse than he had anticipated.

I was afraid ... and so I agreed.

The second session was much worse. I was again asked to undress ... and this time Dr. Coldwell told me to close my eyes and visualize myself on the beach ... having amazing sex. He put my hands on myself and had me masturbate for him ... this was necessary he said. While I masturbated he inserted one finger into my vagina, and one into my mouth, he said this was to help him pass the energy needed for my healing. It felt wrong, it seemed wrong, looking back I can't imagine why I allowed it to happen.

I should have known better. I did know better. But I went back for a third session ... and it was one of the worst things that's ever happened to me. This time while I was masturbating with my eyes closed ... Dr. Coldwell removed all of his own clothes. While he had his fingers inside me ... he placed his penis into my hand. He made it clear that if I wanted his expert energetic healing ... I would need to give him a hand job.

"I'm going to give you something that has more energy than you can imagine," is what he said. It sounds stupid now, but at the time, I don't know.

I gave him the hand job ... and he released his energy onto my naked stomach.

From some of the things he told me about his unhappy sex life, and his unmet desires, I think I may have gotten off lucky. Surely some of his "treatments" involved full on sexual contact. I just wanted to get the hell out of there ... I just wanted to forget.

Dr. Coldwell told me that I must never tell anyone about what happened, which is fine by me, because it wasn't exactly my finest hour. We never talked about it much afterward, but I feel on the couple of occasions we've had interactions over the years, he's made sure to remind me by implication that I'd be even more embarrassed than he if what I'd let him do to me ever came to light.

I've never talked about this before with anyone. It's making me very upset just thinking about it. I'd love to help bring Leonard Coldwell to justice, but not all by myself. I've already suffered plenty ... and I fear that Leonard is a vindictive and dangerous man capable of anything. I don't want myself, or my family, to become the focal point of his cruel rage. But please, someone needs to do something to stop Leonard Coldwell."

One of the victims of Leonard's "treatments" was just sixteen years old at the time :: let's call her the babysitter ... because that's what she was when Coldwell first met her at an even younger age. The babysitter's five days of unimaginable Leonard energies ended badly :: as you'd expect ... but worse. She talked with a friend about what had happened to her a week later ...

"... she really didn't seem to understand what she was doing. she also told me about her visions and about seeing a little girl and described her to me and the dress she was wearing. she was happy about this. [she] didn't understand that she had been violated. i had to tell her. she felt extremely stupid and dirty. she was confused. she finally realized it wasn't her fault."

Maybe she realized it wasn't her fault :: I'd really like to believe that ... but we'll never know because shortly after her fake lymph-node treatments she was murdered in a seemingly unrelated {*but equally horrible*} incident. Bernd Klein *aka* Leonard Coldwell changed the arc of the babysitter's life :: and that new arc ended before it started ... thanks Bernd ... youth destroyed ... but at least we still have you and your cancer curing old-man testicles.

Are we fucking sad yet?

#### OMG!

All this awful :: so many years ... and nothing was done. Old fashioned laws :: old-fashioned courts :: intimidation :: fear :: embarrassment :: and greed ... conspire together to keep everything as it always was regards Leonard Coldwell. The prosecutor didn't think rape charges would stick without clear "nos" :: most of the victims were wary of participating ... and had no interest in participating if the charges were going to be anything less than a serious felony.

Who can blame them for wanting to move on ... for not wanting to relive the whole thing repeatedly in vivid detail? Leonard Coldwell is a sick bastard :: with a reputation for fighting dirty dirty ... not trying to battle him alone was the right move for seemingly isolated damsels in distress.

But something just changed :: just now ... did you feel it?

This shit is out there now like 10,000 tons of elephants :: and it's not coming back in ... you're not isolated ... you're not alone. It wasn't your fault :: and this tiny stupid fucking idiot is no longer a person to fear ... he's a person to mock for being nothing but a nothing. If you've ever wanted to go out to the barricades :: to stand on the rubble of the parts of your life that Leonard Coldwell destroyed and demand that he be brought to some justice ... then now is your moment.

Cause I'll tell you who's out there on that barricade :: already screaming ... me.

Cause I'll tell you who's got your back now :: 'til the end ... me.

This particular police report details only a tiny time period in The Life of Leonard. But because of leopards :: and their spots ... the rest of his time on Earth has prolly been filled by more of the same. You can talk about it here anonymously :: you can talk to me ... I can help you decide what to do ... and I'll keep your secrets if you decide you want to do nothing. There are more of you than you think ... and just talking about it is one of the most important things we can do.

This has to be stopped ... whatever it takes.

NotDoctor Leonard Coldwell's only source of meager power and income is :: like all scammers ... rooted in his connection to Scamworld insiders. Without those connections he's just a dirty old man with no job :: no skillz ... and no life. Scamworld insiders don't give a shit who you rape or murder ... as long as you can build a downline. Previous rumors :: and totally credible reports ... of misdeeds weren't enough to deter people inside scamworld from doing business with Coldwell.

How about now?

Cause I'll tell you who's going to be calling any operations or opportunities that put this piece of shit on stage :: wait for it ... ME!

If Doctor Doctor Doctor Coldwell PHD wants to have a dirty dirty fight :: then that's totally fucking fine with me ... fighting is kinda like my main thing and stuff.



Go ahead Leonard :: put your tiny dirty dick in my hand and let's see who gets healed ... I fucking dare you.

#### >> bleep bloop

**Original URL:** http://saltydroid.info/dr-leonard-coldwells-handson-healing/

# Exhibit B

Facebook screen capture -- December 2012



Leonard Coldwell Nmd Phd 
Abe Husein
15 hours ago

Just for all the doubters to know. My lawyer just got of the phone with the marinated Troll - he was sh.. his pants criminal and civil lawsuits against him all the other losers have been started to day. This information is mainly for the losers that believe I dont follow up on my lawsuits against defamation, libel and slander. All of these losers live basically in a trailer anyway but when I am dont with them they have to eat dog droppings

#### Like · Comment

🖒 Abe Husein and MrsDon French like this.



MrsDon French You rock, Dr. C. Thanks for the update. 15 hours ago · Like · 🖒 1



Leonard Coldwell Nmd Phd Thx MrsDon My lawyer is telling me that the guy is mentally ill and he will get him disbarred too Now I will not stop until he and his playmate are legally done and will never have a dime in their lifes again

15 hours ago · Like

### **Exhibit** C

#### Facebook screen capture -- February 2014

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2 peop	le like this.						
*	Abe Husein LOLLOL!!! DR C, u r hardcore! A true man of his word! February 20 at 8:46pm						
Sevir.	Leonard Coldwell Nmd Phd Oh yeah that is just the beginning they have no idea whats coming even to the gay Jew and the Mental retard in Japan. They think they are safe but conspiracy to destroy grounds of business is a federal crime and all of them will not just give my everything they own via civil suet - they all will go to federal prison. February 21 at 4:16am						
	Leonard Coldwell Nmd Phd It just took longer to get this Jason Droid loser because he gave me and posted on his site a wrong address. Pretending he is living in a High Class neighborhood Took us a couple of days to find him in a trailer park That you understand what kind of mentally retarded people we are dealing with here is the CNN TV NEWS report on him - https://www.youtube.com/watch?v=o813yiM-mZs						
		Jasor	y Droid the Docum .youtube.com n Jones, otherwise k y of violating Illinoi	nown as "the Salty			
	February 21 at 5:55am Leonard Coldwell Nmd Phd And here is a video showing him off as the loser he						
S.	is: https://www.youtube.com/watch?v=k2tGeqfRVQc						
		Paroo SO N PWN	v Droid the Nerdy dy .youtube.com dy/Video of Black E IERDY" Nerds can be ED. LOL	yed Peas "I gotta fe	eling" "I AM		
	February 21 at 5:5		الجنبا ومعرو والمس	o dono ob sut all al	a back		
C. NIV	grounds of the slu	it, the gay, th Will be a lot o out by their w	will have a cool vide le mental retard and of fun. Isnt it intere: ifes?	the gay Jew and th	ne fake		

## **Exhibit D**

#### Facebook screen capture -- February 2014



#### Leonard Coldwell Nmd Phd ► Abe Husein

17 hours ago 址

Here is the info on the loser that has noting else to do than trying to cover his own inferiority complex by attacking licensed people that are honorable and board certified: He is done plus he is in my opinion practicing law without a license: The Losers info from the state bar is: Jason M. Jones Full Former name(s):None Date of Admission as Lawyer

by Illinois Supreme Court:August 2, 2005 Registered Business Address:1101 S State St Apt 902

Chicago, IL 60605-3181Registered Business Phone:(312) 237-0275 Illinois Registration Status:Not authorized to practice law as attorney is not currently registered with ARDC and has not demonstrated required MCLE compliance Malpractice Insurance:

(Current as of date of registration;

consult attorney for further information)In annual registration, attorney reported that he/she does not have malpractice coverage. (Some attorneys, such as judges, government lawyers, and in-house corporate lawyers, may not carry coverage due to the nature of their practice setting.)



Leonard Coldwell Nmd Phd https://www.iardc.org/ldetail.asp?id=821928896 17 hours ago



Leonard Coldwell Nmd Phd So funny he is begging my lawyer for mercy as I understand his email showing how scared he is. Soon the other will have fun too - I am coming !!

17 hours ago

### **Exhibit E**

Facebook screen capture -- February 2014



Leonard Coldwell Nmd Phd ► Abe Husein February 26 - Edited ﷺ

I am talking bets: I bet Jason the Droid will never ever post anything like his former posts about me again! Any takers? I heard he is hiding at his cheap home sh..g his pants and biting his finger nails and wishes he would never messed with me. One down a few more to go.



Leonard Coldwell Nmd Phd Funny since the slut knows the Feds are coming she is taking the posts down against me - but slut: we have screen shuts - and watch - my legal team and the government is coming!!! Just watch me now and what the law does to federal law offenders!!!

Yesterday at 9:29am



Leonard Coldwell Nmd Phd I will teach these losers how to spell (federal crime ) conspiracy to destroy grounds of business and they may sit in the same jail cell with Kevin Trudeau soon Yesterday at 12:00pm · Edited

## Exhibit F

#### Facebook screen capture -- February 2014



Leonard Coldwell Nmd Phd ► Abe Husein 18 hours ago - Edited ﷺ

If you also want to file criminal and or civil charges against: Jason Michael Jones (AKA Salty Droid) his new address is: 1101 S. State Street Apt. 902, Chicago, IL 60605. For libel, defamation, slander etc My lawyers will support you and I will support you financially in your legal action and quest for justice. (I have already one more person) Just write to Assistant@drleonardcoldwell.com and we connect you to our legal staff. Oh yeah the loser has not even money for a lawyer and wants to represent himself. He says he is a lawyer and thinks he can represent himself in Federal Court? Hmmm let's see how that works for him. He also offered to talk to my lawyers and wanted to saddle this outside the courts and take his defamatory posts down. LOL – I will finish everybody that messed with you and when my lawyers have him on the ground, they will make sure they finish him lawfully up. Everybody ever messing with me should know that I never ever lost a fight in my life and see what it says on my website: " I will not start the fight – but I will finish it." One done a few more to go.



Leonard Coldwell Nmd Phd That you understand what kind of mentally challenged person we are dealing with here is the CNN TV NEWS report on him - https://www.youtube.com/watch?v=o813yiM-mZs

#### Salty Droid the Documentary. Jason Jones SCAMMER www.youtube.com

Jason Jones, otherwise known as "the Salty droid" is guilty of violating Illinoi... See More

18 hours ago



Leonard Coldwell Nmd Phd And here is a video showing him off as the loser he is: https://www.youtube.com/watch?v=k2tGeqfRVQc

#### Salty Droid the Nerdy Troll PWNED: I got a feeling parody www.youtube.com

Parody/Video of Black Eyed Peas "I gotta feeling" "I AM SO NERDY" Nerds can be dangerous! Angry weird nerds PWNED. LOL

18 hours ago



Leonard Coldwell Nmd Phd Oh and on Monday it will turn over to another lawyer because it is now as I just learned a federal issue 17 hours ago



Leonard Coldwell Nmd Phd He is not even be licensed to practice law He does not even have any insurance in that field – Man am I are going to have fun with that Jason M. Jones Full Former name(s):None Date of Admission as Lawyer by Illinois Supreme Court:August 2, 2005 Registered Business Address:1101 S State St Apt 902

Chicago, IL 60605-3181Registered Business Phone:(312) 237-0275 Illinois Registration Status:Not authorized to practice law as attorney is not currently registered with ARDC and has not demonstrated required MCLE compliance Malpractice Insurance:

(Current as of date of registration;

consult attorney for further information)In annual registration, attorney reported that he/she does not have malpractice coverage. (Some attorneys, such as judges, government lawyers, and in-house corporate lawyers, may not carry coverage due to the nature of their practice setting.)

17 hours ago

## **Exhibit G**

#### Email to SaltyDroid from ibmsvip@gmail.com

What dont you understand about that this is now a federal case? Its a criminal case now too! A 🔳 🖶 🖻 Federal US Inbox x

#### IBMS VIP

to me 👻

district attorney is taking care of this NOW "federal case" . Conspiracy to destroy grounds of business is a very serous crime and libel defamation and slander too. Accusing someone of having committed a crime that has never been sued, indicted, trialed or convicted of any wrong doing in his life, wow sister you dug your own LEGAL grave. Now we are talking about 2 criminal cases. And in the 3 Civil cases against you: ( do you think Dr C is the ONLY one suing you, sister? Wrong!) Proven losses in amounts you will never even accumulate in your lifetime will make you work for Dr C for the rest of you miserable life. YOU caused loss of business and other damages that will soon be finalized. The proven damages done will cost you more than you can ever make in your lifetime. We will have so much fun collecting and taking every dime you have and ever will have via the court system. NOW you are in OUR world of games! We are right and the legal system will give us what we deserve: Justice to us and legal punishment to YOU. Let us know when the posts are gone because sister, every time someone links to them its a new case and crime as our lawyers stated. Happy drowning in your own feces. The law is on our side. Every single statement you made is false. Its a lie, libel and defamation with the ONLY goal to destroy grounds of business. Accusing someone of having committed a crime that he was never ever even officially accused of or stating in public that the greatest therapist of our times does not have a legitimate Doctor degree etc Oh honey puff - we and our lawyers will have such a field day with you in court.( and jail) Nothing will be left - Look at Trudeau he messed with us and see what happened? Watch what our lawyers do after you lost it all in court and are off to jail. Minutes left to take it down Tick Tock .. YOUR time is running our sister. Did you not see Dr C's post " I will not start the fight but I will finish it"? You have not seen the full force of the law yet. We are leaning back and enjoying the show. Popcorn is ready too. Good luck because you are going to need it

### Exhibit H

Feb 27