

CIVIL COVER SHEET

The JS-44 civil cover sheet and information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

1. (a) PLAINTIFFS

STEVEN SCOTT SAMUELSON

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF ITASCA
(EXCEPT IN U.S. PLAINTIFF CASES)

DEFENDANTS

THE STATE OF MINNESOTA; THE COUNTY OF ITASCA; THE COUNTY OF ST. LOUIS; JUDGE JON MATURI; JACK MUHAR; TODD S. WEBB; PAT MEDURE; TOM ROY; ADVOCATES FOR FAMILY PEACE; MELISSA SCAIA; THE UNITED STATES OF AMERICA; U.S. DEPT. OF VETERANS AFFAIRS; ERIC K. SHINSEKI; OTHER UNNAMED DEFENDANT

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT _____
(IN U.S. PLAINTIFF CASES ONLY)
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

Plaintiff, pro se: STEVEN SCOTT SAMUELSON, #234139,
MCF-FARIBAULT, 1101 Linden Lane,
Faribault, MN 55021-6400

ATTORNEYS (IF KNOWN)

For THE STATE OF MINNESOTA, Lori Swanson, Minn. Atty. Gen.;
For THE UNITED STATES OF AMERICA, the Office of the United
States Attorney

II. BASIS OF JURISDICTION

(PLACE AN "X" IN ONE BOX ONLY)

- | | |
|---|--|
| <input type="checkbox"/> 1 U.S. Government Plaintiff | <input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) |
| <input checked="" type="checkbox"/> 2 U.S. Government Defendant | <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III) |

III. CITIZENSHIP OF PRINCIPAL PARTIES

(PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

PTF DEF	PTF DEF
Citizen of This State <input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State <input type="checkbox"/> 4 <input type="checkbox"/> 4
Citizen of Another State <input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State <input type="checkbox"/> 5 <input type="checkbox"/> 5
Citizen or Subject of a Foreign Country <input type="checkbox"/> 3	Foreign Nation <input type="checkbox"/> 6 <input type="checkbox"/> 6

IV. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STAT'DIES
<input type="checkbox"/> 110 Insurance	PERSONAL INJURY	PERSONAL INJURY	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 365 Personal Injury - Product Liability		<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability		<input type="checkbox"/> 450 Commerce/CC Rates/Etc.
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers Liability			<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	PERSONAL PROPERTY		<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 370 Other Fraud		<input type="checkbox"/> 510 Selective Service
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 371 Truth in Lending		<input type="checkbox"/> 850 Securities/Commodities/ Exchange
<input type="checkbox"/> 160 Stockholders Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage		<input type="checkbox"/> 875 Customer Challenge 12 USC 3410
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 385 Property Damage Product Liability		<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 195 Contract Product Liability				<input type="checkbox"/> 892 Economic Stabilization Act
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS		<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 510 Motions to Vacate Sentence HABEAS CORPUS:	<input type="checkbox"/> 894 Energy Allocation Act	
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 530 General	<input type="checkbox"/> 895 Freedom of Information Act	
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 443 Housing Accommodations	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice	
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 444 Welfare	<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 950 Constitutionality of State Statutes	
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 890 Other Statutory Actions	
<input type="checkbox"/> 290 All other Real Property		<input type="checkbox"/> 555 Prison Condition		

V. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

- | | | | | | |
|---|---|--|---|--|--|
| <input checked="" type="checkbox"/> 1 Original Proceeding | <input type="checkbox"/> 2 Removed from State Court | <input type="checkbox"/> 3 Remanded from Appellate Court | <input type="checkbox"/> 4 Reinstated or Reopened | Transferred from <input type="checkbox"/> 5 another district (specify) <input type="checkbox"/> 6 Multidistrict Litigation | Appeal to District Judge from <input type="checkbox"/> 7 Magistrate Judgment |
|---|---|--|---|--|--|

VI. CAUSE OF ACTION (CITE THE U. S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE BRIEF STATEMENT OF CAUSE.
DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY.)

Unconstitutional Minnesota state statute; 42 USC §1983 - Deprivation of civil rights under color of statute;
42 USC §1985(2) - Obstructing justice by deterring witness; Unconstitutional federal statute

VII. REQUESTED IN COMPLAINT:CHECK IF THIS IS A CLASS ACTION
 UNDER F.R.C.P. 23DEMAND \$10.056 trillion;
Declaratory & Injunctive ReliefCHECK YES only if demanded in Complaint
JURY DEMAND: YES NO**VIII. RELATED CASE(S)** (See instructions):
IF ANY

JUDGE _____

DOCKET NUMBER _____

DATE

SIGNATURE OF ATTORNEY OR RECORDS PLAINTIFF, PRO SE

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFR _____ JUDGE _____ MAG. JUDGE _____

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

STEVEN SCOTT SAMUELSON

Plaintiff,

v.

THE STATE OF MINNESOTA;

THE COUNTY OF ITASCA, State of Minnesota;

THE COUNTY OF ST. LOUIS, State of Minnesota;

JUDGE JON MATURI, Judge of the Minnesota District Court, both in his official capacity and individually;

JACK MUHAR, County Attorney,
County of Itasca;

TODD S. WEBB, Asst. Co. Attorney,
County of Itasca;

PAT MEDURE, former Sheriff of the
County of Itasca;

TOM ROY, Minnesota Commissioner of Corrections;

ADVOCATES FOR FAMILY PEACE,
A Minnesota Non-Profit Corporation;

MELISSA SCAIA;

THE UNITED STATES OF AMERICA;

THE U.S. DEPT. OF VETERANS AFFAIRS;

ERIC K. SHINSEKI, U.S. Secretary of
Veterans Affairs; and

Other unnamed defendant;

Defendants.

**COMPLAINT FOR
DECLARATORY RELIEF,
INJUNCTIVE RELIEF,
AND DAMAGES**

File no. _____

DEMAND FOR JURY TRIAL

Plaintiff alleges:

1. That this is, firstly and foremostly, an action by Plaintiff against Defendant, The State of Minnesota, for declaratory relief, seeking judgement that a certain Minnesota state statute, namely M.S. 518B.01, Subd. 22, as the same was in effect on November 30, 2009, is unconstitutional, both on its face and as applied in the instant case; and that said statute is unconstitutionally vague and so violates Due Process as guaranteed by the Fifth Amendment to the United States Constitution, and that it violates the First Amendment as regards free speech, and the Ninth Amendment as regards freedom of association, and particularly private intimate association; and that it further violates the Fourteenth Amendment as the same prohibits a state from making or enforcing a law which abridges the aforementioned rights, and as the same prohibits a state from denying due process and equal protection of the laws. The wording of the said statute is stated in Exhibit "A", hereof.

2. This is further an action for recovery, pursuant to 42 USC §1983, of damages, occasioned by the State and County defendants, and others, resultant of deprivation of Plaintiff's constitutional rights under the color of enforcement of said unconstitutional statute.

3. This is further an action for damages under 42 USC §1985(2) for obstruction of justice, by the defendants who are judicial or law enforcement officers, and others, in the deterring, by force, intimidation, or threat, of a witness from attending a court and from testifying freely, fully, and truthfully, to the matter concerning the Plaintiff, pending therein; and so damaging the Plaintiff by denying him due process of law and a fair trial as guaranteed by the Fifth and Fourteenth Amendments to the United States Constitution, and the ability to present witnesses in his defense as guaranteed by the Sixth, and Fourteenth Amendments to the United States

Constitution.

4. This is further an action pursuant to 42 USC §1983, against defendants Advocates for Family Peace and Melissa Scaia (hereinafter, collectively, the “Advocates Defendants”), The County of St. Louis, and “Other Unnamed Defendant” for recovery of damages for said Defendants’ complicity in the aforementioned deprivation of the rights of the Plaintiff, including, but not limited to, his right of freedom of intimate association under the Ninth and Fourteenth Amendments to the U.S. Constitution; and for damages pursuant to 42 USC §1985(3) for conspiracy, by said defendants, to interfere with the Ninth and Fourteenth Amendment rights of the Plaintiff.

5. This is further an action, against the U.S. Dept. of Veterans Affairs, and named officers and employees thereof, for restoration of all rights and benefits of the Plaintiff, which rights and benefits have been reduced or curtailed due to the enforcement of the said unconstitutional statute (M.S. 518B.01, Subd. 22), and for recovery of benefits due the Plaintiff which have been unpaid therefor.

6. This is further an action against The United States of America for declaratory relief finding 38 USC §5313, under which certain veterans benefits may be reduced, to be arbitrary, capricious, unreasonable and unconstitutional.

7. JURISDICTION. Original jurisdiction of the United States District Court is conferred by both the United States of America being a party defendant, and also by a federal question being raised, pursuant to 28 USC §1331.

8. VENUE. All of the events or omissions giving rise to the claim occurred in the District of Minnesota. Venue is thusly proper under 28 USC §1391.

9. PARTIES AND CAPACITIES. Plaintiff Steven Scott Samuelson is an individual resident of the State of Minnesota, having his residence at 43309 State Highway 65, Nashwauk, Minnesota 55769. The Plaintiff is presently incarcerated at the Minnesota Correctional Facility at Faribault, Minnesota, and is inmate # 234139. The Plaintiff's mailing address is STEVEN SCOTT SAMUELSON, #234139, MCF-FARIBAULT, 1101 Linden Lane, Faribault, MN 55021-6400.

10. Defendant The State of Minnesota is a State, formed under the laws of the United States of America. The address of the Chief Executive Officer of said Defendant is: Mark Dayton, Office of the Governor of the State of Minnesota, 130 State Capitol, 75 Rev. Dr. Martin Luther King Jr. Blvd., St. Paul, MN 55155.

11. Defendant The County of Itasca is a county, and a political subdivision, of the State of Minnesota, organized under the laws of the State of Minnesota. Said Defendant's address is 123 N.E. 4th St., Grand Rapids, MN 55744.

12. Defendant The County of St. Louis, is a county, and a political subdivision, of the State of Minnesota, organized under the laws of the State of Minnesota. Said Defendant's address is 100 N. 5th Avenue W., Duluth, MN 55802.

13. Defendant Judge Jon Maturi was, at all times herein mentioned, a judge of the Minnesota District Court, Ninth Judicial District, sitting at Grand Rapids, Itasca County, Minnesota. Said Defendant's office address is 123 N.E. 4th St., Grand Rapids, MN 55744.

14. Defendant Jack Muhar was, at all times herein mentioned, the County Attorney for the County of Itasca, State of Minnesota. Said Defendant's office address is 123 N.E. 4th St., Grand Rapids, MN 55744.

15. Defendant Todd S. Webb was, at all times herein mentioned, an Assistant County

Attorney for the County of Itasca, State of Minnesota. Defendant Webb was the prosecutor in proceedings against the Plaintiff, for violation of the subject unconstitutional statute, and an actor, along with Defendant Judge Maturi in the deterral of a witness in violation of 42 USC §1985(2). Said Defendant's office address is 123 N.E. 4th St., Grand Rapids, MN 55744.

16. Defendant Pat Medure was, at all times herein mentioned and prior to January 4th, 2011, the Sheriff of Itasca County, State of Minnesota. Deputies and employees of said Defendant Pat Medure were charged with maintaining courtroom order during criminal proceedings in which the Plaintiff herein was a Defendant, and some of said deputies and employees acted in the deterral of a witness in violation of 42 USC §1985(2), by preventing, by force, threat or intimidation, said witness's attendance of said court proceedings. The residence address of said Defendant is unknown, but believed to be in Itasca County Minnesota. Said Defendant has stated that his address for service of process is his former office address: c/o the Itasca County Sheriff's Office, 440 1st. Ave. NE, Grand Rapids, MN. Said Defendant's telephone number is 218-327-9016.

17. Defendant Advocates For Family Peace is a Minnesota Nonprofit Corporation, organized under the laws of the State of Minnesota, and funded, in part, by the Minnesota state, local, and the U.S. federal governments. Said the registered office of said defendant is 1611 4th St. NW, Grand Rapids, Minnesota 55744.

18. Defendant Melissa Scaia was, at times mentioned herein, the Executive Director of Defendant Advocates For Family Peace. Her residence address is believed to be 704 9th St. NE, Chisholm, Minnesota.

19. Defendant Tom Roy is the Minnesota Commissioner of Corrections, and presently has physical custody of the Plaintiff. Said Defendant's office address is Minnesota Department of

Corrections, 1450 Energy Park Drive, Suite 200, St. Paul, Minnesota 55108.

20. The United States of America is a Defendant in this action as regards constitutional challenge to its statute, 38 USC §5313. The address of counsel, in the District of Minnesota, for the United States of America is: Office of the United States Attorney, U.S. Courthouse, 300 S. 4th Street, Suite 600, Minneapolis, MN 55415.

21. Defendant the U.S. Dept. of Veterans Affairs administers veterans benefits programs including disability compensation benefits to which the Plaintiff is entitled, but which are presently being denied him due to conviction under the said unconstitutional statute. Said Defendant's address, in the District of Minnesota, is: Dept. of Veterans Affairs, Bishop Henry Whipple Federal Bldg., 1 Federal Drive, Fort Snelling, St. Paul, MN 55111-4050.

22. Defendant Eric K. Shinseki is the Secretary of the United States Dept. of Veterans Affairs and is charged with paying the said benefits to the Plaintiff. Said defendant's office address is: U.S. Department of Veterans Affairs, 810 Vermont Avenue, NW, Washington, DC 20420.

23. The true name and address of "Other unnamed Defendant", is unknown to Plaintiff, who therefore sues said Defendant as "Other unnamed Defendant". Said unnamed defendant is the Probation Officer, an employee of the Defendant The County of St. Louis, who was Jennifer Bardine's probation officer who acted as described herein, post, at the time of the so stated events. Plaintiff will amend this complaint to show the true name and address of this defendant when the same becomes known to him.

24. Jury demand. Although some of the issues raised herein may be disposed of, by the Court, as matters of law; as the extent of his damages is a material issue, the Plaintiff demands a jury trial.

25. UNDERLYING FACTS. As of November 25th, 2009, the Plaintiff herein, and his fiancee, Jennifer Bardine, had been together as a couple for approximately two years.

26. On November 25th, 2009, the Plaintiff and said Bardine, who then lived with the Plaintiff at his home near Nashwauk, Minnesota, were having a verbal argument. During part of said argument, said Bardine spoke, on the telephone, to a relative of hers in another city. Said relative shortly thereafter became concerned, and placed a call to law enforcement.

27. In response to said call, officers of the Nashwauk Police Dept., and Itasca County Sheriff's (Defendant Sheriff Pat Medure's) deputies arrived at Plaintiff's said home.

28. Although said Bardine made no complaint against the Plaintiff to said deputies and officers, and did not ask that he be arrested, said deputies nonetheless arrested him for suspected domestic assault, and took the Plaintiff, on November 25th, 2009, to the Itasca County Jail where he was incarcerated.

29. At, or shortly following said arrest, said deputies, including but not limited to Itasca County Sheriff's Deputy Tony Ugrich, prepared a complaint which falsely stated that said Jennifer Bardine complained of being assaulted by the Plaintiff herein.

30. Shortly following arrest and jailing of the Plaintiff, two charges of domestic assault (Itasca Co. case no. 31-CR-09-3704) were filed against him by the office of Defendant Jack Muhar, Itasca County Attorney. (These charges were eventually, and on January 5th, 2011, dismissed, following said Bardine's testimony, at a hearing on August 31st, 2010 (testimony - Exhibit "C"), and thereafter, that she had not been assaulted by the Plaintiff herein.)

31. On approximately November 30th, 2009, and acting under the authority of M.S. 518B.01, Subd. 22, Defendant Judge Jon Maturi issued a Domestic Abuse No-Contact Order

(DANCO) prohibiting contact between the Plaintiff herein, and said Jennifer Bardine, for one year. Said order was never requested by said Bardine, nor was protection of any kind requested by her.

32. Said Bardine had attempted to attend the hearing when the said DANCO was issued, to tell the court, and, if necessary, testify, that the Plaintiff had committed no assault or abuse against her, and that no such DANCO was necessary or desired, and that she opposed the issuance of such a no-contact order; but she was prevented from offering said information or testimony to the court, as she was, by deputies (bailiffs) acting under the direction of Defendant Pat Medure, ejected from the courtroom before she could offer such testimony or information; and was not permitted to attend said court proceeding.

33. At the time of said arrest, November 25th, 2009, and immediately before being taken from his home, Plaintiff had attempted to give money for necessities to said Bardine, who, at the time, had little or no money in her possession; but the arresting deputies refused to permit him to do so. (Please see Exhibit "D" - Affidavit of Jennifer Bardine).

34. On approximately December 1, 2009, mail, sent to Plaintiff, containing disability checks from Social Security and Veterans Administration, arrived at Plaintiff's home, and were received, with Plaintiff's consent, by said Jennifer Bardine.

35. As of such time, Plaintiff had made arrangements with said Bardine, for her to get the said checks to Plaintiff, at the jail, and he would then endorse them so that said Bardine could cash them and have use of the money to pay household bills, and also for other necessities such as food, etc. Said Bardine made necessary arrangements with Itasca County jail officials for this to be done.

36. When said Bardine so caused said checks to be delivered to Plaintiff at the said jail, on approximately December 3, 2009, and he had endorsed them, Itasca County jail officials, acting under the direction of Defendant Pat Medure, then refused to return said endorsed checks to said Bardine, or to a friend that said Bardine had requested to act on her behalf in receiving said checks, from the jail officials, for her. (Exhibit "D" - Affidavit of Jennifer Bardine).

37. Approximately a week following Plaintiff's endorsement of said checks, Itasca County jail officials released the same to Plaintiff's daughter, Sarah Lippincott; but when it was, shortly thereafter, discovered by Itasca County officials (employees of Defendant County of Itasca, acting in their official capacities and under color of law) that this had been done, said officials telephoned the bank where they believed said checks would be presented; and directed said bank not to accept said checks. Said action by said officials was done without lawful cause; and further impeded said Bardine's access to the money, as said bank would not, then, accept said checks until they received further written correspondence from the Plaintiff, several days later.

38. At this time, said Jennifer Bardine (Plaintiff's fiancee) was living at the Plaintiff's home, in the country, about 8 miles north of the City of Nashwauk, MN. She was there, now alone and faced with the onset of winter, unable to drive (due a previous DWI), and without money for food, heat, and to keep the utilities on. The actions of the said Itasca Jail officials, in refusing to return said checks to said Bardine, created an urgent need for said Bardine to contact the Plaintiff for help, money and resources for the necessities of life, and to ascertain what to do. (Exhibit "D" - Affidavit of Jennifer Bardine).

39. Accordingly, during December, 2009, while the Plaintiff was held at the Itasca County Jail, said Bardine, who was wholly dependent upon the Plaintiff, needed to contact him for

household necessities such as money, food, firewood for heat, septic problems, etc. Some days, said Bardine left over 100 messages per day, for Plaintiff, on the jail's inmate messaging system. These phone calls were, particularly, necessitated by the Itasca County jail's aforestated refusal to release Plaintiff's said checks to said Bardine, and later impeding said checks being cashed or deposited as aforestated; and many of said phone calls were concerning said matters, and said Bardine's lack of money for food and necessities. Accordingly, the Plaintiff returned some of her phone calls from the jail. He was subsequently charged, for making said calls, with 32 counts of violating the aforementioned no-contact order, under M.S. 518B.01, Subd. 22. He was also charged with one additional count due to Bardine's attempted visits to Plaintiff at the jail, and one count due to Plaintiff's writings and documents found in his cell which were allegedly for, or allegedly to be used in, contacting said Bardine. Altogether, the Plaintiff was charged with 34 counts of violating the DANCO under M.S. 518B.01, Subd. 22 (Itasca Co. Minn. Case no. 31-CR-10-169).

40. Throughout Plaintiff's jailing, said Bardine made numerous unsuccessful attempts to have the DANCO removed or vacated; and she also told authorities that she had not been assaulted or abused by the Plaintiff herein; nonetheless, the assault charges continued to be pressed by Defendant Jack Muhar, and the DANCO was left in place by Defendant Judge Jon Maturi.

41. As Plaintiff, until approximately July, 2010, did not have private counsel, Defendant Judge Maturi appointed, as counsel for him, attorney Anne Marcotte. Said Marcotte was then on the Board of Directors of Defendant Advocates For Family Peace, which organization is adverse to the legal causes of the Plaintiff (see Exhibit "D", Affidavit of Jennifer Bardine, at pp. 2 & 3

thereof).

42. During extended periods during the jailing of Plaintiff by Defendants Pat Medure and the County of Itasca, the Plaintiff was, by said defendants, cut off from outside communications. He was not allowed by said defendants to send or receive mail, or to make telephone calls. His outside contact was, for the most part, limited to a few in-person visits, and contact with the aforementioned Anne Marcotte.

43. In approximately July, 2010, a "secret" meeting was convened between Defendants Judge Maturi, Anne Marcotte, and Defendant Todd Webb, at which meeting the Plaintiff was not permitted to be present. Shortly following same, said Anne Marcotte met with the Plaintiff and told him words to the effect that she had met with Defendant Judge Jon Maturi, and that if Plaintiff exercised his right to take his case to trial, he would end up sitting in prison for a long time. Said Marcotte encouraged Plaintiff to plead guilty to some of the charges of violation of the no-contact order.

44. Approximately July, 2010, and pursuant to said conversation with said Marcotte, Plaintiff entered a plea of guilty to some of the said charges of violating the no-contact order. Following the discovery, however, of the judicial misconduct in convening the aforementioned secret meeting, Defendant Judge Jon Maturi allowed the Plaintiff to withdraw his said plea.

45. The Plaintiff continued to be held on the 2 domestic assault, and 34 DANCO violation charges against him. Because these charges, if proven, would result in a violation of Plaintiff's probation on an earlier unrelated matter, and because when arrested he had a small amount of alcohol in his system which would also be a probation violation (although not charged); although bail was set on the assault and DANCO charges, the Plaintiff was, by Defendant Judge Jon

Maturi, and unconstitutionally, ordered held without bail pending trial, for the alleged probation violations.

46. Also, shortly following the Plaintiff's arrest and detention, said Jennifer Bardine, who was, herself, on probation for Driving While Intoxicated, was told by her probation officer, an employee of Defendant The County of St. Louis, and sued herein as "Other unnamed Defendant", that if said Bardine continued to reside at the Plaintiff's residence, or visited there for any reason (e.g. to check mail, safeguard the premises, feed her cat, etc.), a warrant would be issued for Bardine's arrest. This action, by said probation officer, was done in concert with Defendants Advocates for Family Peace, and Defendant Melissa Scaia (See Exhibit "D" - Affidavit of Jennifer Bardine, at 3, thereof).

47. At the time of said threat of arrest, Bardine resided at Plaintiff's residence with Plaintiff's consent. This threat of arrest of Bardine caused her to vacate Plaintiff's property, and caused the Plaintiff's real property - i.e. his home - to become vacant, unattended, and subject to burglary, looting, and vandalism. It also made Miss Bardine homeless for a time. The whereabouts of said cat are now unknown.

48. Said Bardine was not violating any law by remaining at Plaintiff's home; and had it not been for said threat of arrest, said Bardine would have remained in residence at the Plaintiff's home.

49. On August 31st, 2009, at a hearing before defendant Judge Jon Maturi, without a jury present, said Bardine gave the testimony as transcribed in Exhibit "C" hereof, that she had not been assaulted or abused by Plaintiff as alleged in the charges against him; that she did not wish for him to be arrested or charged; that the contacts with the Plaintiff were welcomed by said

Bardine and necessary for her well-being (due to the aforementioned necessary household exigencies); and that she initiated said contacts by leaving messages for Plaintiff on the Itasca Co. Jail's inmate messaging system.

50. Notwithstanding this, the said domestic assault charges continued to be maintained by defendants against the Plaintiff, and the accompanying DANCO (no-contact order) was left, by defendant Judge Jon Maturi, in place and in effect until it expired on November 30th, 2010.

51. On November 30th, 2010 and December 1st, 2010, the Plaintiff was tried, in a jury trial, at which defendant Judge Jon Maturi presided, for the said 34 counts of alleged violation of the said DANCO (no-contact order) (Itasca Co. Minn. Case no. 31-CR-10-169).

52. Said Jennifer Bardine attended said jury trial and desired to testify, as she had done at the said prior interim hearing before Judge Maturi and without a jury present on August 31st, 2010 (Transcript of testimony, Exhibit "C"); that she had not been assaulted or abused by Plaintiff as alleged in the charges against him; that she did not wish for him to be arrested or charged; that the contacts with the Plaintiff were welcomed by said Bardine and necessary for her well-being (due to the aforementioned necessary household exigencies); and that she initiated said contacts by leaving messages for Plaintiff on the Itasca Co. Jail's inmate messaging system.

53. Had she been allowed to testify fully and freely at said trial, said Bardine's testimony could have further truthfully included that said Bardine had never, in their two years together, been assaulted or abused by the Plaintiff herein, that she did not request the said no-contact order (DANCO), that she had tried to appear in Defendant Judge Maturi's court to offer testimony in opposition to the issuing of said order, but was ejected from the courtroom by employees of Defendant Pat Medure acting under said Defendant's direction (see Exhibit "D" - Affidavit of

Jennifer Bardine), that she had attempted to have it vacated or removed, and that, in fact, she sometimes left over 100 messages a day, on the Itasca County Jail's phone messaging system, for the Plaintiff herein to call her.

54. The defense attorney (John Graham) for the Plaintiff herein, at said jury trial, desired to call said Bardine as a witness and have her so testify, freely, fully, and truthfully, before the jury.

55. Prior to said Jennifer Bardine's testimony, however, Defendant Judge Jon Maturi sent the said jury out of his courtroom, and admonished said Bardine that she may not testify to the said matters, and admonished Plaintiff's defense attorney not to elicit said testimony, under implicit or expressed threat of penalty for contempt of court.

56. The free, full, and truthful testimony of said Bardine was therefore deterred solely by force, intimidation, and threat, notwithstanding that same was done under color of law; and solely because of the foregoing, said Bardine did not testify, at said trial, and before said jury, to the said matters; to which she would otherwise have testified.

57. As a proximate result of said Bardine's not being allowed to testify freely, fully, and truthfully, before the said jury, the Plaintiff herein was deprived of a fair trial and due process of law as guaranteed by the Fifth, Sixth, and Fourteenth Amendments to the United States Constitution.

58. Absent such exculpatory and explanatory testimony (of said Bardine), the Plaintiff was convicted of 33 counts of violating the unconstitutional DANCO (no-contact order). Had said Bardine been allowed to testify freely, fully, and truthfully, before the said jury, it is highly probable that said jury would have reached a different verdict.

59. On January 4th, 2011, the Plaintiff was sentenced, by Defendant Judge Jon Maturi, for

the said DANCO violations, to five years and five days imprisonment, without credit for the time he had served pending trial, continuously, from November 25th, 2009.

60. On January 5th, 2011, Defendants Todd S. Webb and Jack Muhar moved for dismissal of the said domestic assault charges (Itasca Co. case no. 31-CR-09-3704), and Defendant Judge Jon Maturi dismissed same.

61. The Plaintiff is presently serving the said sentence at the Minnesota Correctional Facility (MCF) at Faribault, Minnesota.

62. The said DANCO violations, pursuant to M.S. 518B.01, Subd. 22, are the sole reason that he is presently imprisoned, and are the sole cause of his imprisonment since January 5th, 2011, when the aforementioned domestic assault charges were dismissed.

63. By said Bardine's said testimony, August 31st, 2010 (Exhibit "C"), it was conclusively shown that the alleged domestic assault, underlying the issuance of the said Domestic Assault No Contact Order (DANCO), never occurred.

64. Nonetheless, the defendants continue to enforce said DANCO by the continued imprisonment of the Plaintiff.

65. During the Plaintiff's imprisonment, and while at MCF-Stillwater, in approximately summer, 2011, the Plaintiff suffered an injury to his hand while working in the kitchen of said facility.

66. Although he brought the injury to the attention of staff at MCF-Stillwater, he was not given immediate first-aid, and the condition developed into a blood infection known as sepsis, which subsequently affected his entire arm before partially subsiding, and has now spread and affected other parts of his body. As a result of said sepsis, the Plaintiff has had severe pain and

suffering, and some permanent scarring and disfigurement. Even at this time, the infection has not yet been fully cured, and the Plaintiff continues to experience pain and suffering from it.

67. During the Plaintiff's jailing and imprisonment, and due to its being unattended, the Plaintiff's real property at 43309 State Highway 65, Nashwauk, Minnesota, his home, and outbuildings, have been repeatedly burglarized, vandalized, and parts of same have been removed and stolen. Some of the said theft and damage occurred during the period from January 5th, 2011 through the present day. Similarly, during said jailing and imprisonment, the Plaintiff has suffered loss of personal property on his said premises due to theft, some of which occurred during the period from January 5th, 2011 through the present day.

FIRST CAUSE OF ACTION:

M.S. 518B.01, SUBD. 22 IS UNCONSTITUTIONALLY VAGUE; AND IS FURTHER UNCONSTITUTIONAL UNDER THE FIRST, FIFTH, NINTH, AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION.

68. Plaintiff, by reference, incorporates herein all of the foregoing.

69. M.S. 518B.01, Subd. 22 (exhibit "A"), hereinafter, "the statute", both on its face, and as it has been, in Minnesota, construed and applied, authorizes a judge, in a criminal case for alleged domestic assault (whether or not proven), to issue an order prohibiting contact between the alleged assailant and the alleged victim. Under the statute, as same has been administered generally, and in the instant case, such order may issue whether or not the alleged victim asks for the order or other protection, and even when the alleged victim vehemently denies that the assault ever happened, desires and requires contact with the alleged assailant, opposed the issuance of the no-contact order, and has tried to have the no-contact order vacated.

70. The statute authorizes the issuance of an order (DANCO) abridging First and Fourteenth Amendment rights (free speech) under the premise of an alleged domestic assault having occurred and to afford the victim protection from future acts; but it allows said First and Fourteenth Amendment rights to continue to be abridged even where, as in the instant case, it is conclusively shown that said alleged assault, which gave rise to the DANCO, did not occur. As such, the statute violates the First and Fourteenth Amendments to the U.S. Constitution.

71. The statute authorizes the issuance of an order (DANCO) abridging Ninth and Fourteenth Amendment rights (freedom of association, particularly intimate association) under the premise of an alleged domestic assault having occurred and to afford the victim protection; but it allows said Ninth and Fourteenth Amendment rights to continue to be abridged even where, as in the instant case, it is conclusively shown that said alleged assault, giving rise to the DANCO, did not occur. As such, the statute violates the Ninth and Fourteenth Amendments to the U.S. Constitution.

72. The statute allows a judge to “break up” a couple by prohibiting contact between them, without any request for protection having been made by either one of the couple, without any crime having been shown to have occurred, and without any need for protection having been shown to exist; and the statute allows the judge to keep the members of couple apart, by preventing them from contacting each other, even after the cause for said prohibition (the alleged domestic assault) has been shown to not have occurred. In this, the statute patently violates the Ninth Amendment right to freedom of intimate association; and the statute, on its face, violates the Fourteenth Amendment to the U.S. Constitution.

73. As such, the statute itself, and on its face; and any order issued under the statute absent a

strong showing that such an order is necessary to prevent harm to a person; is an impermissible and unconstitutional restraint of free speech as protected by the First Amendment to the U.S. Constitution, and of free association, including intimate association, as protected by the Ninth; and said statute is an abridgement of rights by the State of Minnesota as prohibited by the Fourteenth Amendment.

74. Further, the statute is unconstitutionally vague, and thusly violates due process as protected by the Fifth and Fourteenth Amendments to the U.S. Constitution.

75. Further, the statute authorizes arbitrary and discriminatory enforcement because it lacks adequate standards guiding and restricting the discretion of the governmental authorities who apply it. It completely lacks standards guiding and restricting the discretion of the district court when determining whether to issue a Domestic Abuse No Contact Order (hereinafter, “DANCO”). The statute contains no limiting terms, indicating that a DANCO, or violation of such an order, applies only to unprotected speech; it does not specifically regulate conduct only where such conduct is damaging to, or invades the privacy of another; indeed, it does not even indicate who can petition the court for issuance of a DANCO, nor does it indicate whether it is appropriate to issue an DANCO over the objection of the alleged victim of the underlying alleged crime. The statute is therefore void-for-vagueness, is unconstitutionally vague, violates free speech as protected by the First Amendment to the U.S. Constitution, the fundamental right of freedom of intimate association as protected by the Ninth Amendment, and the Fourteenth Amendment.

76. The statute is criminal in nature. It imposes criminal penalties (in the instant case, 5 years and 5 days imprisonment, without credit for time served) and thusly is subject to a high standard

of clarity and certainty. Further, because it implicates fundamental constitutionally protected activities, free speech and association, the statute is subject to a high level of scrutiny.

77. Because the statute implicates free speech under the First Amendment, the Plaintiff is permitted to challenge the statute on its face, that is, challenge the hypothetical vagueness of the statute as applied to others, even if the statute is neither vague nor overbroad as applied to the Plaintiff (Village of Hoffman Estates v. Flipside, Hoffman Estates, Inc., 455 U.S. 489, 494-95, 102 S.Ct. 1186, 1191 (1982)). In the instant case, however, the statute is vague and overbroad as it has been applied to the Plaintiff.

78. Issuance of a DANCO is a prior restraint on speech because it prohibits speech before it is uttered. Furthermore, such an order cannot be classified as a time, manner and place restriction because it is directed at conduct and speech that could potentially occur at any place or time. Thus, the statute (M.S. 518B.01, Subd. 22) implicates freedom of speech under the First Amendment of the Federal Constitution, and Article I, Section 3 of the Minnesota Constitution, warranting a facial challenge.

79. The statute (M.S. 518B.01, Subd. 22) implicates the fundamental right of freedom of intimate associations, warranting a higher level of scrutiny.

80. In the instant case, the alleged victim, Jennifer Bardine, did not request that the DANCO be issued, and tried to have same removed. She did not request protection of any kind against the Plaintiff. She made no complaint against the Plaintiff, did not ask that he be arrested, did not state any assault or abuse to deputies at the scene of Plaintiff's arrest on November 25th, 2009, and later testified in open court (but was not allowed, by defendants, to so testify before the jury) that the Plaintiff had not abused nor assaulted her in any way.

SECOND CAUSE OF ACTION:

DEPRIVATION OF RIGHTS UNDER COLOR OF STATUTE - 42 USC §1983

81. Plaintiff, by reference, incorporates herein all of the foregoing.
82. The Plaintiff has been incarcerated continuously, without being allowed to post bail, since his said aforementioned arrest on November 25th, 2009, to the present day. The Plaintiff has, at a minimum, from the time of dismissal of the aforementioned domestic assault charges, January 5, 2011, and up until the present day; been deprived, by Defendants Maturi, Muhar, Webb, Medure, Roy, and particularly by Defendants The State of Minnesota and The County of Itasca; of his freedom solely due to their enforcement of the said unconstitutional statute (M.S. 518B.01, Subd. 22) and the no-contact order (DANCO) issued thereunder.
83. Said unconstitutional statute was enacted, maintained, and enforced by Defendant the State of Minnesota and its officers and employees, and enforced, in the instant case, also by Defendant the County of Itasca, and its officers and employees.
84. The said statute authorized the Domestic Assault No Contact Order (DANCO), which was also unconstitutional. Said unconstitutional DANCO was issued against Plaintiff by Defendant Judge Jon Maturi, under color of the unconstitutional statute (M.S. 518B.01, Subd. 22), and pursuant to a complaint for the said alleged domestic abuse filed by officers and employees of Defendant Pat Medure; and pursuant to the filing of charges against Plaintiff and prosecution of said complaint, by Defendants Itasca County Attorney Jack Muhar and Asst. Itasca Co. Attorney Todd S. Webb.
85. Similarly, the complaint of Plaintiff's alleged violation of the unconstitutional DANCO was filed by officers and employees of said Defendant Pat Medure, and of the County of Itasca,

and prosecuted, with charges filed against Plaintiff therefor, by said Defendants Jack Muhar and Todd S. Webb.

86. Said Defendant Pat Medure, and his officers and employees, also detained and imprisoned the Plaintiff at times mentioned herein in violation of his Constitutional rights and under color of said unconstitutional statute (M.S. 518B.01, Subd. 22).

87. Defendant Tom Roy, Minnesota Commissioner of Corrections, presently has custody of the Plaintiff and continues to so imprison the Plaintiff in violation of his Constitutional rights.

88. The alleged violations of said unconstitutional DANCO, issued under said unconstitutional statute, and enforced by the aforementioned Defendants, are the sole causes for the Plaintiff's imprisonment during the period, at a minimum, from January 5th, 2011 through the present day, and are the sole causes for his continued imprisonment at this time. Thusly, said imprisonment is solely for reason of, and a penalty for, the Plaintiff's exercise of free speech and free association (by speaking to the said Miss Bardine), and thusly violates and deprives Plaintiff of his rights under the First, Ninth, and Fourteenth Amendments to the United States Constitution.

89. Additionally, the said Defendants have otherwise acted, under colour of law, to deprive the Plaintiff certain of his other Constitutional rights.

90. Damages against the said defendants who acted to bring about the said deprivation of rights are recoverable under 42 USC §1983.

91. That Plaintiff's damages occasioned thereby include, but are not limited to, the value of his freedom, loss of business profits or other earnings, loss of veterans benefits, loss of Social Security benefits, damages to his health, and pain and suffering, due to said incarceration and lack

of proper medical care during same, and damages to his unattended real and personal property due to the looting and vandalizing of same; the amount of said damages to be shown at trial.

THIRD CAUSE OF ACTION: OBSTRUCTION OF JUSTICE, UNDER 42 USC §1985, BY
DETERRING A WITNESS FROM ATTENDING A COURT, AND FROM TESTIFYING TO
A MATTER PENDING THEREIN, FREELY, FULLY, AND TRUTHFULLY. DEPRIVATION
OF FIFTH, SIXTH, AND FOURTEENTH AMENDMENT RIGHTS; AND DAMAGES
THEREFOR UNDER 42 USC §1983.

92. Plaintiff, by reference, incorporates herein all of the foregoing.

93. At times after November 25th, 2009, and prior to August 31st, 2010, when the Plaintiff was to have appeared in various hearings regarding the aforementioned criminal charges of domestic assault and of violating the DANCO; Jennifer Bardine attempted to attend said hearings, before Defendant Judge Jon Maturi, to offer exculpatory evidence, and specifically, to offer testimony to the effect that the Plaintiff committed no assault or abuse of her; and that she did not want the DANCO (no-contact order) and that she desired that said DANCO be vacated or otherwise removed; but, by the acts of Itasca County Sheriff Pat Medure, and his deputies and employees who were present in Judge Maturi's courtroom, and by force, threat, or intimidation, she was caused to leave the courtroom and was prevented from attending said proceedings (Exhibit "D" - Copy of Affidavit of Jennifer Bardine, pp. 3 & 4).

94. At the Plaintiff's jury trial, November 30th and December 1st, 2010, on the said charges of violating the Domestic Assault No Contact Order (DANCO) (Itasca Co. Minn. Case no. 31-CR-10-169), said Jennifer Bardine attended said jury trial and desired to testify, as she had done at a prior interim hearing before Judge Maturi and without a jury present on August 31st, 2010

(Transcript of testimony, Exhibit "C"); that she had not been assaulted or abused by Plaintiff; that she did not wish for him to be arrested or charged; that the contacts with the Plaintiff were welcomed by said Bardine and necessary for her well-being (due to the aforementioned necessary household exigencies); and that she initiated said contacts by leaving messages for Plaintiff on the Itasca Co. Jail's inmate messaging system. Had she been allowed to testify fully and freely at said trial, said Bardine's testimony could have further truthfully included that said Bardine had never been assaulted or abused by the Plaintiff herein, that she did not request and did not desire the said no-contact order (DANCO), that she had attempted to have it vacated or removed, and that, in fact, she sometimes left over 100 messages a day, on the Itasca County Jail's phone messaging system, for the Plaintiff herein to call her (Exhibit "D" - Copy of Affidavit of Jennifer Bardine). The defense attorney (John Graham) for the Plaintiff herein, at said jury trial, desired to call said Bardine as a witness and have her so testify, freely, fully, and truthfully, before the jury.

95. Immediately prior to said Jennifer Bardine's testimony, however, Defendant Judge Jon Maturi sent the said jury out of his courtroom, and admonished said Bardine that she may not testify to the said matters, and admonished Plaintiff's defense attorney not to elicit said testimony, under implicit or expressed threat of penalty for contempt of court. The free, full, and truthful testimony of said Bardine was therefore deterred solely by force, intimidation, and threat, notwithstanding that same was done under color of law, and solely because of the foregoing, said Bardine did not testify, at said trial, and before said jury, to the said matters; to which she would otherwise have testified.

96. As a proximate result of said Bardine's not being allowed to testify freely, fully, and truthfully, before the said jury, the Plaintiff herein was deprived of a fair trial and due process of

law as guaranteed by the Fifth, Sixth, and Fourteenth Amendments to the United States Constitution. Absent such exculpatory and explanatory testimony, he was convicted of 33 counts of violating the unconstitutional DANCO (no-contact order). Had said Bardine been allowed to testify freely, fully, and truthfully, before the said jury, it is highly probable that said jury would have reached a different verdict.

97. The actions of Defendant Judge Jon Maturi, here, indicate an utter contempt, on his part, for due process, for the laws of the State of Minnesota and the United States, and for the United States Constitution. This was again evident at sentencing, when, on January 4th, 2011, said Defendant Judge Maturi sentenced the Plaintiff herein to 5 years and 5 days *without credit for the time he had served pending trial* (over a year, from his arrest November 25th, 2009). This action, by Defendant Judge Maturi, was expressly and blatantly in violation of the Minnesota Rules of Criminal Procedure, Rule 27.03 (Sentencing Proceedings), Subd. 4 (Sentencing), which states, “When pronouncing sentence the court must: . . . (B) State the number of days spent in custody in connection with the offense or behavioral incident being sentenced. That credit must be deducted from the sentence and term of imprisonment and must include time spent in custody from a prior stay of imposition or execution of sentence.” (Minnesota Rules of Criminal Procedure with amendments effective January 1, 2010)

98. As a result of the said actions of Defendant Judge Jon Maturi, in concert with those of Defendant Pat Medure and his officers and employees, and in concert with Defendant The State of Minnesota, and Defendant The County of Itasca, and in concert with Defendants Jack Muhar and Todd S. Webb; in deterring, by threat, force, and intimidation, said Jennifer Bardine from testifying freely, fully, and truthfully; and as a result of the Plaintiff thereby being denied a fair trial

and due process, the Plaintiff herein has suffered damages, including, but not limited to, the value of his freedom during the period, including but not limited to, from January 5th, 2011 until the present time; loss of business profits or other earnings; loss of veterans benefits; loss of Social Security benefits; damages to his health, and pain and suffering, due to said incarceration and lack of proper medical care during same; and damages to his unattended real and personal property due to the looting and vandalizing of same; the amount of said damages to be shown at trial. The said damages are recoverable, against the said Defendants, pursuant to 42 USC §1983, and 42 USC §1985.

FOURTH CAUSE OF ACTION: 42 USC §1983; 42 USC §1985(3). DEPRIVATION OF CIVIL RIGHTS BY DEFENDANTS COUNTY OF ST. LOUIS, “OTHER UNNAMED DEFENDANT”, ADVOCATES FOR FAMILY PEACE, AND MELISSA SCAIA; CONSPIRACY TO INTERFERE WITH CIVIL RIGHTS, BY SAID DEFENDANTS

99. Plaintiff, by reference, incorporates herein all of the foregoing.

100. Defendants Advocates For Family Peace, and Melissa Scaia (hereinafter, the “Advocates Defendants”), conspired with Jennifer Bardine’s probation officer, an employee of Defendant The County of St. Louis, to deny Plaintiff his Ninth and Fourteenth Amendment (U.S. Constitution) right of freedom of intimate association, and as a proximate result of said conspiracy, and concerted acts thereunder by the said defendants, said defendant probation officer (sued as “Other Unnamed Defendant”), and under colour of law, interfered with, abridged and impeded said right by threatening said Jennifer Bardine with arrest if she remained in residence, or came upon, the real property of Plaintiff.

101. The said Defendants so acted with the intent of depriving the Plaintiff of his Ninth and

Fourteenth Amendment rights of freedom of association, and particularly, freedom of intimate association.

102. Said Bardine violated no law by being at or residing upon at the Plaintiff's property, and said defendant probation officer ("Other Unnamed Defendant") had no lawful cause for making said threat of arrest of said Bardine.

103. Said actions, by said defendants, damaged Plaintiff's intimate association with Bardine, and also caused Plaintiff's real and personal property to become unattended and subject to looting and vandalism which has since occurred.

104. Because, due to its funding and operation, Defendant Advocates For Family Peace is an agency of the state and federal government, damages for the foregoing are recoverable pursuant to 42 USC §1983.

105. Because said actions of the Advocates Defendants, County of St. Louis, and "Other Unnamed Defendant" constitute conspiracy to interfere with civil rights, damages are recoverable pursuant to 42 USC §1985(3).

106. As a result of said deprivation of rights, the Plaintiff has suffered damages including, but not limited to, the value of his intimate association with said Bardine, and damages to his unattended real and personal property due to the looting and vandalizing of same, which crimes would have not occurred had said Bardine remained in residence at said real property; the amount of said damages to be shown at trial.

FIFTH CAUSE OF ACTION: DEPRIVATION OF CIVIL RIGHTS BY DEFENDANTS, THE
UNITED STATES DEPT. OF VETERANS AFFAIRS, AND ERIC K. SHINSEKI, BY
FURTHER PENALIZING THE PLAINTIFF FOR EXERCISE OF FREE SPEECH AND FREE
ASSOCIATION. CAUSE UNDER 42 USC §1983.

107. Plaintiff, by reference, incorporates herein all of the foregoing.

108. At the time of his aforementioned arrest, on November 25th, 2009, and during all times herein mentioned, the Plaintiff has been a veteran, totally and permanently disabled due to a service-related injury.

109. As such, he is entitled to, and was receiving, immediately prior to being sentenced on January 4th, 2011, veterans disability benefits of \$2,673. per month. As of January 1, 2012, said benefits were increased, for payees situated similarly to the Plaintiff, to \$2,769. per month.

110. The Plaintiff received the said benefits through the payment for May 1, 2012.

111. In approximately July, 2012, the Plaintiff received a letter from the U.S. Dept. of Veterans Affairs Regional Office, at Fort Snelling, St. Paul, Minnesota, dated February 17, 2012, stating that due to his conviction and imprisonment for violating the unconstitutional no-contact order (DANCO) instituted and enforced pursuant to the aforementioned unconstitutional statute (M.S. 518B.01, Subd. 22), his benefits would be reduced to \$127. per month, and that he may have received an overpayment, which would have to be repaid. Per said letter, said reduction was instituted pursuant to 38 USC §5313 (Exhibit “B”, hereof).

112. Said letter was sent, and said benefit reduction was made, by or under the authority of Defendants U.S. Dept. of Veterans Affairs and Eric K. Shinseki, hereinafter referred to as the “Veterans Affairs defendants”.

113. Beginning with the payment for June 1, 2012, the Plaintiff's said benefits were so reduced to \$127. per month. He received \$127. for each of June, July, and August, 2012. He has received no benefits in or for September, 2012 and months following.

114. The said reduction of Plaintiff's veterans benefits, under the circumstances stated herein, is, effectively, an additional penalty for the Plaintiff's exercise of protected free speech, and freedom of intimate association. Further, this additional penalty has been applied before the conviction, for which it is imposed, has been finally determined by the exhaustion of all appeals and reviews.

115. Under the circumstances aforestated, and due to same, the Plaintiff, who is dependent upon said benefits, and is entitled to receive same, now suffers hardship due to the reduction of same, as this has jeopardized his having the necessary funds to retain counsel, pay filing fees, and pay other fees and costs necessary to defend against enforcement of the said unconstitutional statute. Said action by said defendants, prior to the finality of the underlying conviction, therefore prejudices Plaintiff's rights, including but not limited to his right of due process and to seek appeal and review of said conviction, by denying him the funds to do so, to which he is entitled. The actions of the Veterans Affairs defendants, effectively, deny improperly convicted veterans the ability to challenge and defend against those convictions.

116. 38 USC §5313 applies only to veterans who have been convicted of a felony, and are also incarcerated therefor. It does not apply to those who have been so convicted, but are released on bail pending appeal. It is therefore unreasonably discriminatory, arbitrary, and capricious; multiplying the injustice where, as in the instant case, a veteran has been improperly convicted for allegedly violating an unconstitutional statute, and has also been, by a state court, denied bail

pending the appeals of said conviction.

117. The Plaintiff herein, as a result of 38 USC §5313, and the actions of the Veterans Affairs defendants, has suffered damages of \$2,642. for each of June, July, and August, 2012; and said damages continue to accrue at the rate of \$2,769. per month for September, 2012 and each month thereafter. As a penalty for exercise of protected free speech and intimate association, and for other cause stated, said damages are recoverable pursuant to 42 USC §1983.

SIXTH CAUSE OF ACTION: CAUSE AGAINST THE UNITED STATES OF AMERICA FOR DECLARATORY JUDGEMENT THAT 38 USC §5313 IS UNCONSTITUTIONAL; THAT SAID STATUTE IS NOT CONSTITUTIONALLY REASONABLE, IS VAGUE, ARBITRARY, CAPRICIOUS, AND DISCRIMINATORY, AND VIOLATES DUE PROCESS OF LAW.

118. Plaintiff, by reference, incorporates herein all of the foregoing.

119. The veterans benefit reduction authorized and required by 38 USC §5313 unreasonably and unconstitutionally prejudices the Plaintiff's rights, and the rights of similarly situated veterans, in that it is instituted, by the Veterans Affairs defendants (the U.S. Dept. of Veterans Affairs, and Eric K. Shinseki), before the veterans' convictions become final (with the exhaustion of all appeals). Said reduction is thusly premature, and by the actions of said Veterans Affairs defendants, the Plaintiff, and similarly situated veterans, are left without the necessary funds, to which funds they are, by their service in the United States Armed Services, entitled; to pursue said appeals with the aid of competent counsel of their choosing and which they could otherwise afford and retain. 38 USC §5313 thusly violates due process by further penalizing incarcerated veterans before their convictions are final, and before the lawful and constitutional reviews of their convictions have occurred; and by its action, impeding said appeals and reviews and the

veterans' lawful ability to seek same.

120. 38 USC §5313 requires said reduction of benefits without inquiry as to whether the said convictions violate federal law, or violate the rights of said veterans under the U.S. Constitution. It is therefore vague, arbitrary, and capricious.

121. 38 USC §5313 authorizes said reduction of benefits for veterans who are convicted of a felony, and incarcerated. It does not reduce benefits for veterans who are convicted, but, by a judge's discretion, released on bail pending appeal. In this way, 38 USC §5313 is discriminatory against those who have also suffered state infringement of their right to bail; making it more difficult for them to defend or pursue their appeals, and so further violates due process.

WHEREFORE, Plaintiff prays judgement,

a) For Declaratory Judgement that the statute, M.S. 518B.01, Subd. 22, is unconstitutional and void;

b) Against Defendants The State Of Minnesota, The County of Itasca, Judge Jon Maturi, Jack Muhar, Todd S. Webb, and Pat Medure, and each of them, for general damages for false, unlawful, and unconstitutional imprisonment from January 5th, 2011 through August 31, 2012; in the amount of \$6,040,000,000; plus \$10 million per day for each day after August 31st, 2012 that the Plaintiff remains so imprisoned; or such other sum as the Court may deem proper. As freedom and security are of incalculable value, the amounts of damages sought herein for same are approximate;

c) For such special and compensatory damages as shown at trial;

d) Against Defendant Jon Maturi, personally, for violating Plaintiff's rights of due process and a fair trial, and pursuant to 42 USC §1985; and particularly due to the gravity of his acts

against the public interests of the administration of justice and the United States Constitution, and to serve as an example to others who might act similarly, punitive damages of \$10,000,000,000,000 (10 trillion dollars); with the provision that due to Judge Maturi's acts as stated herein being a fraud upon his oath of office to uphold the laws of the United States, that said debt shall not be dischargeable in bankruptcy; or such other sum as the Court may deem proper under the circumstances;

- e) For restoral of his freedom and release from prison;
- f) Against Defendant Tom Roy, Minnesota Commissioner of Corrections, for injunctive relief against the continued wrongful incarceration of the Plaintiff, under color of the unconstitutional statute, M.S. 518B.01, Subd. 22.
- g) Against Defendants Advocates For Family Peace, Melissa Scaia, the County of St. Louis, and "Other unnamed Defendant"; for interfering with, conspiring to interfere with and to deny, and denying the Ninth and Fourteenth Amendment rights of the Plaintiff to intimate association, general damages in the amount of \$1 million.
- h) Against Defendants Advocates For Family Peace, Melissa Scaia, and "Other unnamed Defendant", for interfering with, conspiring to interfere with and to deny, and denying the Ninth and Fourteenth Amendment rights of the Plaintiff to intimate association, punitive damages in the amount of \$50 billion.
- i) Against Defendants the U.S. Dept. of Veterans Affairs, and Eric K. Shinseki, in the amount of \$7,926. (for June, July and August, 2012), plus \$2,769. per month for each month after August, 2012, during which month the said damages are accrued;
- j) For restoral of his normal veterans benefits;

- k) For Declaratory Judgement that 38 USC §5313 is arbitrary, capricious, unreasonable and unconstitutional;
- l) For his costs of action, including attorney fees allowable under 42 USC §1988; and
- m) For such other and further judgement as the Court deems proper.

Dated: _____

Steven Scott Samuelson, Plaintiff
#234139 MCF-Faribault
1101 Linden Lane, Faribault, MN 55021-6400

EXHIBIT “A”

MINNESOTA STATUTES 518B.01 Subd. 22 as same was in effect on November 30th, 2009:

Subd. 22. Domestic abuse no contact order. (a) A domestic abuse no contact order is an order issued by a court against a defendant in a criminal proceeding for:

- (1) domestic abuse;
- (2) harassment or stalking charged under section 609.749 and committed against a family or household member;
- (3) violation of an order for protection charged under subdivision 14; or
- (4) violation of a prior domestic abuse no contact order charged under this subdivision. It includes pretrial orders before final disposition of the case and probationary orders after sentencing.

(b) A person who knows of the existence of a domestic abuse no contact order issued against the person and violates the order is guilty of a misdemeanor.

(c) A person is guilty of a gross misdemeanor who knowingly violates this subdivision within ten years of a previous qualified domestic violence-related offense conviction or adjudication of delinquency. Upon a gross misdemeanor conviction under this paragraph, the defendant must be sentenced to a minimum of ten days' imprisonment and must be ordered to participate in counseling or other appropriate programs selected by the court as provided in section 518B.02. Notwithstanding section 609.135, the court must impose and execute the minimum sentence provided in this paragraph for gross misdemeanor convictions.

(d) A person is guilty of a felony and may be sentenced to imprisonment for not more than five years or to payment of a fine of not more than \$10,000, or both, if the person knowingly violates this subdivision: (1) within ten years of the first of two or more previous qualified domestic violence-related offense convictions or adjudications of delinquency; or (2) while possessing a dangerous weapon, as defined in section 609.02, subdivision 6. Upon a felony conviction under this paragraph in which the court stays imposition or execution of sentence, the court shall impose at least a 30-day period of incarceration as a condition of probation. The court also shall order that the defendant participate in counseling or other appropriate programs selected by the court. Notwithstanding section 609.135, the court must impose and execute the minimum sentence provided in this paragraph for felony convictions.

(e) A peace officer shall arrest without a warrant and take into custody a person whom the peace officer has probable cause to believe has violated a domestic abuse no contact order, even if the violation of the order did not take place in the presence of the peace officer, if the existence of the order can be verified by the officer. The person shall be held in custody for at least 36 hours, excluding the day of arrest, Sundays, and holidays, unless the person is released earlier by a judge or judicial officer. A peace officer acting in good faith and exercising due care in making an arrest pursuant to this paragraph is immune from civil liability that might result from the officer's actions.

EXHIBIT “B”

38 UNITED STATES CODE Section 5313, subsection (a) and subsection (d):

Sec. 5313. Limitation on payment of compensation and dependency and indemnity compensation to persons incarcerated for conviction of a felony

(a)(1) To the extent provided in subsection (d) of this section, any person who is entitled to compensation or to dependency and indemnity compensation and who is incarcerated in a Federal, State, local, or other penal institution or correctional facility for a period in excess of sixty days for conviction of a felony shall not be paid such compensation or dependency and indemnity compensation, for the period beginning on the sixty-first day of such incarceration and ending on the day such incarceration ends, in an amount that exceeds -

- (A) in the case of a veteran with a service-connected disability rated at 20 percent or more, the rate of compensation payable under section 1114(a) of this title; or
- (B) in the case of a veteran with a service-connected disability not rated at 20 percent or more or in the case of a surviving spouse, parent, or child, one-half of the rate of compensation payable under section 1114(a) of this title.

.....

(d) The provisions of subsection (a) of this section shall apply

- (1) with respect to any period of incarceration of a person for conviction of a felony committed after October 7, 1980, and
- (2) with respect to any period of incarceration on or after October 1, 1980, for conviction of a felony of a person who on October 1, 1980, is incarcerated for conviction of such felony and with respect to whom the action granting an award of compensation or dependency and indemnity compensation is taken on or after such date.

EXHIBIT “C”

TESTIMONY OF JENNIFER BARDINE

The following five pages, which detail the testimony of Jennifer Bardine, are the cover page, and pages 6 through 9, inclusive, of the transcript of proceedings, August 31st, 2010, before Judge Jon Maturi (no jury present) in the matter of State of Minnesota v. Steven Scott Samuelson (Case no. 31-CR-10-169 - prosecution for alleged violation of a no-contact order). Said Bardine's testimony begins at the bottom of page 6, thereof (the second page following this page).

Said transcript pages are as transcribed by Court Reporter Victoria Griffith-Fall, and are copied from the official transcript entitled by reporter Griffith-Fall as “TESTIMONY OF WITNESSES: SARAH LIPPINCOTT and JENNIFER BARDINE”. The questions asked of said Bardine are asked by Samuelson’s then-attorney John Graham; and the answers are those of Jennifer Bardine, then on the witness stand and under oath.

COPY

1 STATE OF MINNESOTA IN DISTRICT COURT
2 COUNTY OF ITASCA NINTH JUDICIAL DISTRICT
3 -----

4 STATE OF MINNESOTA, File: 31-CR-10-169
5 Plaintiff, TESTIMONY OF WITNESSES:
6 vs. SARAH LIPPINCOTT and
7 STEVEN SCOTT SAMUELSON, JENNIFER BARDINE
8 Defendant.
9 -----

10 The above-entitled matter came on for hearing
11 before the Honorable Jon A. Maturi, Judge of District Court,
12 at the Courthouse in the city of Grand Rapids, County of
13 Itasca, State of Minnesota, commencing on August 31, 2010.

14 APPEARANCES:

15 Mr. Todd Webb, Assistant Itasca County Attorney,
16 appeared on behalf of the State of Minnesota.

17 Mr. John R. Graham, Attorney at Law, appeared on
18 behalf of the Defendant, who was also present.

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Reporter: Victoria Griffith-Fall, RPR

1 I've asked, either party?

2 MR. WEBB: No, Judge.

3 MR. GRAHAM: No further questions.

4 THE COURT: Thank you. You may step down.

5 (Witness excused.)

6 MR. GRAHAM: For the sake of having a good
7 record here in the event of a possible appeal, I would like
8 to call Jennifer Bardine for a short inquiry. I know that
9 I've made an offer of proof, but in my offer of proof Your
10 Honor didn't have my written motion, now it does; but I would
11 like to call her just to perfect the record.

12 THE COURT: Mr. Webb?

13 MR. WEBB: For that purpose, I'm fine.

14 THE COURT: All right. Do we still want other
15 possible witnesses sequestered, or not?

16 MR. WEBB: Yes.

17 THE COURT: So anyone else who is a possible
18 witness on these cases has to step out, but Ms. Bardine can
19 come forward. Just step up here first and raise your hand.

20 (Whereupon,

21 JENNIFER BARDINE,

22 was first duly sworn, and responding
23 affirmatively, was examined and
testified as follows:)

24 THE COURT: Have a seat over there, please.

25 Ms. Bardine, state your full name and spell

1 the last name, please.

2 THE WITNESS: Jennifer Lynn Bardine,

3 B-A-R-D-I-N-E.

4 THE COURT: Thank you, very much. Go ahead,
5 Mr. Graham.

6 DIRECT EXAMINATION

7 BY MR. GRAHAM:

8 Q Jennifer, you are aware that Steven Samuelson is charged
9 with acts of domestic violence?

10 A Yes.

11 Q That is, he's charged with battering?

12 A Yes, I'm aware.

13 Q And also of causing you to fear for your own safety?

14 A Yes.

15 Q And you also understand that he's charged with
16 contacting you on several occasions contrary to no contact
17 orders of the Court?

18 A Yes.

19 Q Okay. Now I'm just going to ask you, you are the
20 individual?

21 A The victim.

22 Q Who is supposed to have been assaulted, right?

23 A Yes.

24 Q And you are the person with whom he made contact --

25 A Yes.

1 Q -- on several occasions while a no contact order of the
2 Court was outstanding?

3 A Yup.

4 Q You understand all that?

5 A Yes.

6 Q All right. On or about the 25th of November of 2009,
7 were you living with Mr. Samuelson?

8 A Yes.

9 Q And on or about the 25th of November, 2009, did Mr.
10 Samuelson do anything by way of an assault or causing you to
11 be fearful of your harm or by way of a battery or hitting you
12 or anything of the kind?

13 A No.

14 Q No?

15 A No.

16 Q Did you ever ask that Mr. Samuelson should be arrested?

17 A No.

18 Q Did you ever ask that he should ever be charged?

19 A Nope.

20 Q Do you feel that in any way you were victimized by
21 Mr. Samuelson?

22 A No, we were only arguing.

23 Q When Mr. Samuelson contacted you, were those contacts
24 welcome or unwelcome?

25 A Welcome.

1 Q How did you communicate your wishes to him?

2 A I left messages on the message line.

3 Q What message line?

4 A In jail.

5 Q So you -- were these by email?

6 A No. It's a phone number I dial and you type in or press
7 in the first three initials of his last name and you have
8 about 30 seconds to leave a message.

9 Q What did you contact him for?

10 A Different things about the house.

11 Q Like what?

12 A Like the furnace is breaking down, how to get wood,
13 um --

14 Q Domestic necessities?

15 A Yeah.

16 MR. GRAHAM: Nothing further.

17 THE COURT: Mr. Webb?

18 CROSS EXAMINATION

19 BY MR. WEBB:

20 Q All right. Just to be clear, ma'am, your testimony is
21 that the Defendant made contact with you on several
22 occasions; is that right?

23 A Yes.

24 Q And those were welcome contacts from the Defendant?
25 They were welcomed by you?

EXHIBIT "D"
COPY OF AFFIDAVIT OF JENNIFER BARDINE

To whom it may concern:

A While back I was in an unusual situation, to say the least. I had arranged for two teenagers to sit with my child while I went out for the night. When I returned home, I was devasted. My daughter was gone and no one would tell me where she was. As the day went on, I frantically put the bits and pieces together.

My older teenage son had gotten into some trouble and when the small town cop came to tell me, he was met by my sitters. In his own opinion, he said, "boys shouldn't babysit girls," and sent them home. He took my daughter and charged me with neglect for "leaving her unattended"!

Anyway, to make a long story short(er), I eventually learned that my daughter "went" to my sister's home in town. Now is where the story gets weird. My sister was dating, and living with a man (Bruce Christiensen), who I was **very uncomfortable** with. I didn't like the way he acted around my young daughter-forcing her to hug him, sudden movements and changes in posture when I entered the room, etc. When I said I wanted him to stop making her hug him and to quit bathing her (she was 8 years old), I was no longer welcome in their home when he was home.

I expressed my concerns with a friend of mine, Kelli, who had been raised by Bruce as her stepdad. She told me that I should be worried. She said, "ask my ex, he will tell you." She called him and we went to his house. That's how Steve and I met. Bruce was his father-in-law for 17 years. Steven & Kelli Samuelson both expressed concern about my daughter since they too had to deal with him-around their three girls.

Steve and I got along really well. He said that he didn't want me to go through what he went through and offered to try to help get my daughter back. He knew the routine, and gave me a ride to AA meetings, treatment, doctors, lawyers, and court dates. There were tons of appointments! He never complained, asked for gas, or anything; but I learned that's just how he was. He dose everything he can to help his friends, neighbors, and even strangers.

Steve and Kelli had their own tragic past because of the county and the "Advocates for Family Peace," (a local independent and very powerful women's group that controls the people and even the courts through intimidation, abuse of power, and false accusations). They too had their children taken without warning or any sort of investigation; based on lies.

As time went by and as I learned more about Bruce, the more he would tell these lies to turn my sister against me; "for being with Steve." He was saying that Steve abused Kelli, so I asked her directly. She told me that Steve never hurt her and that her mom and Bruce got the advocates to take their kids and charge Steve falsely, by blackmailing Kelli.

Now, with the help of these "Advocates," false things were being said about me. No matter how good I did, it didn't matter. The director, Melissa Skia, of the Advocates, went to my treatment center, got me thrown out, and then the next center as well, all because I was seeing Steve. She tried for nearly a year to convince me to file false charges of assault against Steve; and I refused.

When I lost my own place, Steve let me move in with him. I got to know him very well and I don't understand why the Advocates are so against him. But he didn't let it bother him. He kept helping me, driving me where I needed.

They finally got their break the day before Thanksgiving of 2009. Steve and I needed to get up early, go to the pawn shop so we could buy some food for the next day. It was a stressful day and we were both frustrated by the time we got home.

That evening, Steve and I were quarreling at the moment my 21 year old daughter called. She had been drinking, and Steve and her didn't always get along. He hung up the phone when she started yelling at him. Being drunk, and 150 miles away, she couldn't come over, so she called a family member and told them that he was "beating up my mom," and they called the police. The next thing we knew was there were cops banging on the door. Because Steve is on probation, he hid. I went to answer the door so I assumed he would have snuck out the basement door.

That is "the beginning of the end," for Steve. The deputy lied in his report, saying Steve "hit me where it wouldn't leave marks" and that I was shaky and scared. If I was scared of anything, it was the way the cop was running all over, screaming, and acting wild.

They found Steve and arrested him. He tried to leave me the money and cigarettes we got in town, but they said no. That left me pennyless and desperate.

When his first court appearance came, the bailiff made me and Steve's daughter leave the courtroom, so I had no opportunity to state my feelings, facts, or anything. The court knew that I didn't call the police and I've told them there really wasn't an assault, and still they put a no-contact order on him. I've tried several times to have it dropped, but they always refused.

In the meantime, I was the worst kind of broke! The jail deputies told me I could bring Steve his va and social security checks to sign, so I could pay bills.

When I had a friend bring in the checks, the jail held them and wouldn't give them back! I was very desperate and started leaving messages on the jail voicemail system for Steve. They said it was over 100 times a day, and it's true. I needed to talk to him! I told him on the system how I had no money or cigarettes (which he knew). The propane ran out, so there was no heat. The pipes and septic froze. Our animals were freezing and eventually I had to watch some of them die. I was hovered by the oven to try and get warm, and the electric was soon going to be shut off. I needed him to call me and tell me what to do! So he did.

They even admitted after listening to the calls, that he didn't threaten me, we didn't argue, etc. But it didn't matter they wanted him, and now they were going to send him away no matter what.

I told officer Mike Bliss on the phone about the desperate situation I was in within the first week Steve was gone. He, or anyone else, never asked if they could help me. They were only concerned with getting stuff to use against Steve. Later on, Melissa from the Advocates, even called my P.O., and they said if I continue to live at Steve's, they would put out a warrant and arrest me. I was even told to call homeless shelters. Freezing, or homeless, they didn't care.

When Steve's trial came, the judge wouldn't allow me, or his lawyer, to tell the jury that I wasn't assaulted, didn't call the police, didn't want or need a ~~no~~ contact order, and that I called him begging that he call me and tell me what to do! I wasn't allowed to tell the whole truth.

Steve had called to tell me what I could sell to get by, and to hand in there. He encouraged me to be patient and not give up. Steve was in jail, suffering, and was still the only person on my side.

Steve was found guilty of violating the no-contact order and sentenced to the maximum of five counts. The judge ran them back to back so with the max of a year and a day for each. He got five years, five days in prison!

Two years before this, I had a restraining order against my ex-husband. I did ask for that order. Well one night, I came home and he had broke into my house. He trapped me in the basement and viciously beat me for an hour and a half. He put me in the hospital. The same court, same judge, gave him 30 days in jail. Steve tells me, "I love you, hang in there," and he gets five years?! The judge even refused to give him credit for the days he spent in jail. Over 400 days extra that he sat!

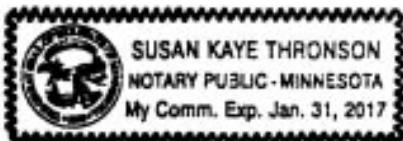
Also, since I was forced out of our home, everything he owned had been stolen. His shop tools, all his electronics, and even the buildings are being destroyed. The siding, wiring, everything-including the kitchen sink.

Steve dose not deserve this! He is a good person. He hurt ~~no~~ one. Not his ex-wife, not a girl he dated for like 6 years, and not me. We all were in court for him, but none of us could say what we wanted. He is one of those "do everything for everyone" kind of people. He keeps insurance on his car, wears his seat belt, and helps his neighbors. He isn't afraid to stand up for the rights of others, and now he suffers for it. The nice guy truly does finish last. He lost everything he loved for helping those he loved. Ironic, but true.

Steve doesn't, and never did, deserve to be locked up. Someone needs to help him for once-and fix this, so he's free.

Jenifer Bandine
8-7-12

Susan Thronson



Aug 7 2012

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