

**UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

Younes Kabbaj,  
Plaintiff

v.

Google Inc. (a Delaware Corporation),  
Amazon Inc. (a Delaware Corporation),  
Yahoo Inc. (a Delaware Corporation),  
John Does 1-10,  
Defendants

**CIVIL ACTION No.**

**COMPLAINT AND JURY DEMAND**

1. Plaintiff seeks declaratory and injunctive relief, and money damages for defamation, tortious interference with contract, negligent and intentional infliction of emotional distress, premised upon diversity of citizenship.

**The Parties**

2. Younes Kabbaj is US citizen and resident of Morocco, temporarily located in Florida.
3. Google Inc. is a Delaware Corporation, certificate attached as **Exhibit 1**.
4. Amazon Inc. is a Delaware Corporation, certificate attached as **Exhibit 2**.
5. Yahoo Inc. is a Delaware Corporation, certificate attached as **Exhibit 3**.
6. John Does 1-10 are unidentified individuals operating Google, Amazon and Yahoo internet facilities to author/publish defamation and threats concerning Plaintiff.

**Jurisdiction and Venue**

7. This Court has subject matter jurisdiction pursuant to 28 U.S.C. 1332 because the amount in controversy exceeds the sum of seventy-five thousand dollars (\$75,000.00), exclusive of interest and costs, and there is diversity of citizenship between Plaintiff and the Defendants.

This Court also has supplemental jurisdiction over the claim for relief that arises under Delaware law pursuant to 28 U.S.C. 1367(a) because it forms part of the same controversy and derives from a common nucleus of operative facts. Venue is proper in this District pursuant to 28 U.S.C. 1391(b)(3) because the Defendants are subject to personal jurisdiction in the District.

### **The Facts**

8. Starting approximately February of 2009, Plaintiff has been subjected to a prolonged campaign of defamation after accepting a job as IT Technician, Head of IT for the American School of Tangier and Marrakesh (herein identified as “AST,” also a Delaware Corporation, certificate attached as Exhibit 4). The subject matter of the defamation is covered in previous litigation in Morocco, as well as Case no. 10-431-RGA and Case no. 12-1322-RGA (Delaware District Court), and Case no. 11-23492-MGC (Southern District of Florida).

9. Previous litigation against a suspected John Doe named Mark S. Simpson is captioned as case no. 12-1322-RGA, yet this litigation failed to yield identifying information concerning the John Does who authored/published website content hosted by Google Inc., Amazon Inc. and Yahoo Inc. (herein known as the “ISPs”). This litigation was dismissed on August 28<sup>th</sup>, 2013. Plaintiff must serve the John Does and/or ISPs with a summons/complaint concerning this matter before the statute of limitations expires. Plaintiff also has limited time to acquire evidence confirming the identities of John Does which authored the defamation published by the ISPs, as well as the death threat emails sent to Plaintiff. All the defamation described in this Complaint targeted Plaintiff, his family in Morocco and the United States, and his previous employer AST which is also intricately tied to Plaintiff’s interests.

10. The subject of this complaint concerns defamation identical in content to that which was previously litigated in criminal/civil cases in Morocco and Delaware (10-431,12-1322), and which has again recently reappeared on the internet facilities of the ISPs complete with descriptions of Plaintiff's identity including his name, job titles including 'IT Technician,' or 'Head of IT' for American School Marrakesh. The defamation accuses Plaintiff of being a heroin dealer, plotting terrorism, hacking, stalking, fraud, theft, death threats and other crimes, as well as false allegations that Plaintiff was a 'closet homosexual.'

11. The defamatory postings cited in this Complaint are also made in violation of a confidentiality agreement reached between Plaintiff and AST in previous litigation 10-431-RGA, rendering that previous settlement agreement null and void and giving rise to the tortious interference claim cited in the instant Complaint. An additional claim for breach of contract will be filed by Plaintiff once discovery confirms the identity of the John Does which Plaintiff is certain are parties released in the previous settlement agreement, which requires Plaintiff to get permission from Delaware District Court before initiating litigation against any of the releases named in the previous settlement agreement (Case No 10-431, Docket Entry 54).

12. Defamatory and threatening communications concerning Plaintiff recently appeared in multiple books/articles/web pages hosted by Google and Amazon. Most of the websites have since been deleted but some still remain active. Several of the websites administered by Google's "Blogger" service were located at the following website addresses and corresponding 'blogger' and 'Google+' profile pages:

- A) <http://www.draculadancing.com>
- B) <http://www.whitmanandrimbaudkissing.com>
- C) <http://www.whitmankissingrimbaud.com>
- D) <http://www.kerouacandrimbaud.com>

- D) <http://www.blogger.com/profile/10595979589183199636> (Attached **Exhibit 38**)
- E) <http://www.blogger.com/profile/03299136927808961600> (Attached **Exhibit 39**)
- F) <http://plus.google.com/102751852946887364961> (Attached **Exhibit 40**)

**Defamation and threats published by Google Inc. internet products and news blogs**

13. The following URL's attached to Complaint are relevant to the instant proceedings:

**Exhibit #**

- 05) [www.draculadancing.com/2012/07/location-la-localisation-des-evenements.html](http://www.draculadancing.com/2012/07/location-la-localisation-des-evenements.html)
- 06) [www.draculadancing.com/2012/07/evil-characters-in-fiction-mal.html](http://www.draculadancing.com/2012/07/evil-characters-in-fiction-mal.html)
- 07) [www.draculadancing.com/2012/09/mark-fish-pretend-headmaster-of-kew.html](http://www.draculadancing.com/2012/09/mark-fish-pretend-headmaster-of-kew.html)
- 08) [www.draculadancing.com/2012/09/the-american-school-of-marrakesh.html](http://www.draculadancing.com/2012/09/the-american-school-of-marrakesh.html)
- 09) [www.draculadancing.com/2012/09/the-cause-of-my-traumatic-stress-quest.html](http://www.draculadancing.com/2012/09/the-cause-of-my-traumatic-stress-quest.html)
- 10) [www.draculadancing.com](http://www.draculadancing.com)
- 11) [www.ilga.org/ilga/en/countries/MOROCCO/Your%20Stories/a8b4f56b-4095-43e5-a3a1-694edbf5c5](http://www.ilga.org/ilga/en/countries/MOROCCO/Your%20Stories/a8b4f56b-4095-43e5-a3a1-694edbf5c5)
- 12) [www.whitmanandrimbaudkissing.com/2012/11/dan-fingermans-wonderful-gay-play.html](http://www.whitmanandrimbaudkissing.com/2012/11/dan-fingermans-wonderful-gay-play.html)
- 13) [www.kerouacandrimbaud.com/2012/11/caveat-emptor-when-it-comes-to-helping.html](http://www.kerouacandrimbaud.com/2012/11/caveat-emptor-when-it-comes-to-helping.html)
- 14) [www.kerouacandrimbaud.com/2012/11/okay-re-introduction-to-you.html](http://www.kerouacandrimbaud.com/2012/11/okay-re-introduction-to-you.html)
- 15) [www.kerouacandrimbaud.com/2012/11/testing-our-own-limits-of-forgiveness.html](http://www.kerouacandrimbaud.com/2012/11/testing-our-own-limits-of-forgiveness.html)
- 16) [www.kerouacandrimbaud.com/2012/11/on-being-writer-few-reflections.html](http://www.kerouacandrimbaud.com/2012/11/on-being-writer-few-reflections.html)
- 17) [www.kerouacandrimbaud.com/2012/12/advice-from-my-desk.html](http://www.kerouacandrimbaud.com/2012/12/advice-from-my-desk.html)
- 18) [www.kerouacandrimbaud.com/2012/12/most-homophobic-or-anti-gay-people-are.html](http://www.kerouacandrimbaud.com/2012/12/most-homophobic-or-anti-gay-people-are.html)
- 19) [www.kerouacandrimbaud.com/2012/12/i-dedicate-this-to-nurse-who-took-her.html](http://www.kerouacandrimbaud.com/2012/12/i-dedicate-this-to-nurse-who-took-her.html)
- 20) [www.kerouacandrimbaud.com/2012/12/the-world-beyond-our-control.html](http://www.kerouacandrimbaud.com/2012/12/the-world-beyond-our-control.html)
- 21) [www.kerouacandrimbaud.com/2012/12/hypothetical-but-fear-producing.html](http://www.kerouacandrimbaud.com/2012/12/hypothetical-but-fear-producing.html)
- 22) [www.kerouacandrimbaud.com/2012/12/no-personal-emails-please-pas-des.html](http://www.kerouacandrimbaud.com/2012/12/no-personal-emails-please-pas-des.html)
- 23) [www.kerouacandrimbaud.com/2012/12/for-gay-man-self-love-take-years-i.html](http://www.kerouacandrimbaud.com/2012/12/for-gay-man-self-love-take-years-i.html)

14. Below are defamatory excerpts from the above Exhibits, including statements that identify Plaintiff by name, job title, and terms like 'Moroccan criminal, felon, wingnut,' etc:

**Exhibit 5**

**A.** "At the moment, I am writing a story about the criminality I found at the American School of Marrakesh. Do I change the locale or maintain it? Its not as if people don't know where I have worked? To inherit a school where a known felon is head of maintenance, a man formerly incarcerated for heroin trafficking in the United States is in charge of IT"

**B.** "Especially, considering the lengths to which these characters and others ... strangely shaped and weirdly behaved Moroccan "aristocrats" threatened me with photos and emails (of my own) ... went to stop me from revealing anything."

**Exhibit 6**

**A.** "In Morocco, as you know, I encountered a horrible man (Younes Kabbaj), a criminal with a felony conviction, an animal who sent me photos (now in the hands of the French authorities) of him and his prison / gang friends with guns, a man who infiltrated all of my email and other private accounts, twisting things to make me look terrible, all with

the end of destroying me. As a human being, the experience gave me PTSD (for which someone is going to pay). However, as a writer, it gave me deep perspective. Why? Because amoral, evil, unscrupulous, unethical, mean and valueless characters, such as the Morocco criminal who was the IT Technician at the school where I worked (The American School of Marrakesh), pose the greatest challenge to writers. They are nearly impossible for writers to paint with dimension and accuracy, because ... quite frankly ... most of us don't understand how someone could do such things. Would you read someone else's most private correspondence? Hand it off to others so they could say, "We know about the email to Germany." I finally figured out they meant an email I'd sent to a gay friend who's a tram conductor in Berlin!"

**B.** "Critics all agree that Vautrin's obvious sexual attraction to Rastignac and Lucien speaks to his repressed homosexuality; he is bound to them by his hunger for power but also his hunger for them, which is precisely the case with my own Moroccan criminal."

### **Exhibit 7**

**A.** "Not my driver nor the criminal IT Technician named Younes Kabbaj, whom we were driving to Casablanca for who knows what nefarious activity, cared at all"

**B.** "I had every possible form of privacy violated: email, general internet, phone, my own home ... in which spying devices were installed. I saw a holiday dedicated solely to the slaughter of sheep, in which my own bodyguard (the Head of Security for Alexander the Great) confessed to being tired after killing so many sheep and cutting them up. Morocco is filthy, backward, disgusting, corrupt (oh, so corrupt). The police demand bribes at every roadblock, the government is full of hideous "Royals," who live the golden life, with jet skis, lavish parties, toy-boys, et al. Do not go to this backward and disgusting country. Do not patronize their hotels and resorts. Avoid Morocco at all costs. Boycott it. It is NOT gay-friendly (being gay is, in fact illegal, and you will, as a friend of mine was, be beaten either to death or nearly), it is hideously sexist, and quite frankly it makes Tijuana look like Oslo. There ..the truth. As Zola would say, "Do something now."

**C.** "He is a sham, a fraud, a shopping mall Santa Claus pretending to be something far beyond his intellect and acumen. I had the misfortune to be recruited by him to go out to the American School of Marrakesh ... and then he was fired for incompetence by the board (not coming to school, behaving erratically, sending contradictory instructions, spending lavishly on his apartment, car, etc.). His departure left me high and dry, with no instructions, no guidelines, no playbook ... nothing but an unaccredited school, with two criminals in its employ, and students who couldn't speak English. Ultimately, the American School of Marrakesh destroyed my career and health, thanks to this total sham Mark Fish"

### **D. Comments:**

**1.** "Anonyme 4.8.12 - Amen. The guy is a complete fake. I worked in Tangier when he was there and we used to call him 'the invisible man,' because you could never find him. I swear he's mentally ill."

**5.** "MarkSutherlandSimpson8.8.12-I know you meant know-nothings .but I agree utterly. Carney, Sandoe does play favorites and they do NOT do their research of

candidates properly. It's all a shell-game. The only thing worse is Search Associates and that homophobic dinosaur John Magagna, who owes me big time”

**6.** “Mark Sutherland Simpson 8.8.12 - In answer to questions I've received, John Magagna refused to allow Search Associates to represent me (thus eliminating hundreds of job opportunities) because of gossip about me having an affair with my Head of Security (and chauffeur, and the gardener, and ...). To make matters worse, he repeated the stories, as I have heard directly from others. Yes ... indeed ... he owes me, and big time is an understatement.”

**7.** “Anonyme 8.8.12 - I work in Tangier, and this man, Mark Fish, was mean for me. He was yelling at me once, because it is alleged that I did not clean the stairs, and I did clean the stairs. He is a liar, no one dearer to him in the whole school, including the Eastman Eliza. Everybody hate him.”

### **Exhibit 8**

**A.** “Many of you write me every day, and most of you wish to remain anonymous. The reason seems to be the Islamic component, and fear of Younes Kabbaj, the former IT technician at the American School in Marrakesh (as well as a former convicted and imprisoned felon in this country for heroin trafficking). Your fear may be well-founded, because he might be able to discern your address. I don't know. You write every day, asking for my story ... and because you worry about me, which I appreciate immensely”

**B.** “Ultimately, out of sheer fear, I resigned my position with the agreement that would not talk about what I discovered at the school as long as school didnt talk about me. However, no sooner had I left for Paris, than I was barraged by threats and death-threat emailing's from Younes Kabbaj (including photos of him and his prison chums with guns)”

**C.** “Of course, he proceeded to infiltrate my life in every way possible, getting on to my Facebook page and pretending to be me or at one point a woman named Victoria Olemma (who knew me from a university I never attended. Hmmm). He contacted former students, made postings in my name ... and the same with my blog, snipping bits and pieces from my computer (to which he had access in Marrakesh, because he was literally inside of it), email and other correspondence. At one point they claimed I had affairs with everyone from several of my chauffeurs, my Head of Security, teachers, and anyone who was male and moved. They claimed to have a Flash Drive with my salacious writings on it, which could only be the short stories and manuscripts obtained from my computer ... and altered beyond recognition by now. Again, people who know me, none of that nonsense would never be true. Yes, I am being treated for PTSD; yes, Younes Kabbaj, Mark Fish, Steve Eastman, possibly the head of a major search agency, and the American School of Marrakesh are the cause of it. There ... I'm exhausted, but maybe I won't need to write a version of this every morning!”

### **D. Comments:**

**1.** “Anonyme 8.8.12 - You poor guy. That Kabbaj character sounds like other people I've heard about from that part of the world. They have no values at all, and no respect for privacy. I hope to heck you plan to sue him and them, and whoever that Search Agency is. Search Associates? I believe I read about the head of that organization in one of the comments about Mark Fish.”

**2.** “Mark Sutherland Simpson 9.8.12 - Thanks for the support, and thanks especially for asking that you be printed even if anonymously. Considering the characters and country we dealing with, that brave of you! Kudos and thanks!”

**3.** “Anonyme 11.8.12 - Dude, I'm SO, SO sorry for you! But you should have done year research man, because that place is famous in Marrakesh for being corrupt. My girlfriend and I lived in Marrakesh for about a year, and EVERYONE in the city knows that the American School is fool of crooks and even murderers (or so Cafe de la Poste gossip claims.) My girlfriend is yelling at me to tell you to keep your chin up and count yourself lucky that you got out of that hellhole alive! What a screwed up, f-ed up country. You can watch naked French music videos and listen to the prayer tower things at the same time?!?”

**4.** “Anonyme 2.9.12-Whoa. I just read this and it totally gave me chills. I've heard of people having things stolen in Morocco, and of lots of corruption, so this doesn't surprise me. However, some of these people should be brought before the police, shouldn't they? Isn't that Mark Fish guy a criminal? What about this Eastman character? He gave permission for spying on employees? Holy whatever. I'm with you, Mark, and I'm so sorry this happened to you. But keep the faith. They'll all get their come-uppance. Evil and stupid people always do. Sean Eastbourne”

### **Exhibit 9**

**A.** “While there, I encountered an individual named Younes Kabbaj, a man who was at the time the School's IT Technician and was spying upon everyone's emails, phone calls, faxes, etc., (teachers, administrators, students, employees), monitoring everyone's computers, installing listening devices in teachers' homes, and intruding directly into our computers via modem. He obtained access to all of my accounts and to all of my contact lists. He managed to intrude into my account at Carney, Sandoe, the Independent School Placement Agency. You imagine, logging into Facebook or your blog and discovering that you are ... already logged on, and that this monster has been falsely pretending to be me. It's hellishly unbelievable and beyond any ethical boundary I have ever encountered in my life. Rightly or wrongly, I chalk it up to his religion, which seems completely amoral to me, appearance, sham, ritual, pretense and ... nothing behind it; nothing but mumbo jumbo. Religion or not, Mr. Kabbaj is an evil man, a criminal, who spent three years in an American Federal Penitentiary for Heroin trafficking”

**B.** “Toward that end, I have taken the advice of authorities and worked to shake him off. I have turned over to them his emails to me, in which in threatened with me death and included photos of himself and his prison friends with guns, including Kalashnikovs. Think doesn't scare the Hell out of you? Think again, my friends ... you ought to read them or see them. You'd be beyond shocked. Even the French authorities passed them around in horror, shocked that anyone would be so foolish as to send out such incriminating emails, which were ... of course, traced by the French DGSE immediately back to the originating ISP”

**C.** “He has been after me because, incorrectly, he believes I fired him and then wrote a letter to the parent body about him. I did neither. The Board of Trustees fired him (against my advice, by the way) for gross misbehavior and violation of the school charter,

and the letter to parents was written and distributed while I was in New York, and not even in Morocco. So, his entire campaign of destruction of my life has, as has so much in his life, been based on nonsense.”

**D.** “I moved locations continuously on advice of French and American authorities, I cut off contact with anyone from my past including friends from childhood and unfortunately witnessed death and mayhem ...something I had never or could ever have anticipated.”

**E.** “I ask Younes Kabbaj, directly, to please leave me the Hell alone. I never fired you, I never sent out a letter about you (Moulay Omar and Madison Cox orchestrated that, using my digital signature, obtained from my office), I never offered you a hint of the calumny, libel and disgrace that you have shoveled upon me. Yes, I am gay. Being gay does not make you a pedophile, a pervert, or any of your other silly, salacious, and defamatory concoctions. In my country, it's an ordinary thing to be gay; it is not ordinary to destroy someone's life in order to achieve some vague personal revenge. That's called criminality, lack of ethics, and abnormal personality type. You're a wingnut on speed, Kabbaj (or is it Cabbage?), a total and complete demon. To the rest of you here, and the thousands of you who have already started reading this blog, thank you for your support. Thank you for reading my blog. Thank you for buying my books ...it keeps me going in the face of evil.”

#### **Exhibit 10**

“Mark lives in a world of silence, unable to communicate with more than two or three people. We go to extreme precautions when speaking with him, and security is strong at all events. His life has been completely invaded electronically and in other fashions, by a criminal of Moroccan origin with a profound psychological problem of some religious/sexual sort. He has written letters to Mark's friends and associates, asserting the most astounding nonsense, co-opted Mark's accounts, faked accounts, tricked, deceived, distorted and ultimately threatened him with death. Mark lives in a shadow world and always will. Our hearts go out to him each and every day. We work closely with the Australian, French and American authorities, all of whom are documenting this criminal's violations of laws regarding invasions of privacy, defamation of character, libel, harassment, cyber-bullying, stalking and infliction of mental distress.”

“Because Mark lives in a world of silence, unable to communicate with more than two or three people. We go to extreme precautions when speaking with him, and security is strong at all events.”

#### **Exhibit 11**

“The major event that occurred; and for which I had no participation - a dual national (American and Moroccan) person was fired by the Board of Directors. Sadly for me, this religious fanatic and true homophobe, decided to focus his intense revenge on me - for three years now. He sent communications to schools I applied to; contacted the agency that represented me and put out terrible lies; most notably that I was a pedophile. Needless to say, in the world of education, even a lie about that issue ends your career. He didn't stop there. He stalked me on email, Facebook and my blogs; he had infiltrated my computer in Morocco and obtained my contact lists and has also written 30 page diatribes about me; or in some cases pretended to be me – writing to former students



saying I was sexually interested in them. I have continuously relocated around the world, concerned about my personal safety.”

**Exhibit 12**

“Unfortunately, one thing that occurred; and for which I had no participation - a person was fired by the Board of Directors. Sadly for me, this person focused his homophobic revenge on me. He sent communications to schools I applied to; contacted the agency that represented me and put out terrible lies; most notably that I was a pedophile. Needless to say, in the world of education, even a lie about that issue ends your career. He didn’t stop there. He stalked me on facebook and my blogs; he had infiltrated my computer in Morocco and obtained my contact lists and has written 30 page diatribes about me; or in some cases pretended to be me – writing to former students saying I was sexually interested in them. I have continuously relocated around the world in order for him not to find me, as I am concerned about my personal safety.”

**Exhibit 13**

**A.** “However, in the course of my last job, I was targeted by a sociopathic IT technician who, after being dismissed from the school for very, very good reasons, became my stalker, harasser and career-destroyer.”

**B.** “This is my author page on Amazon, of which I am also proud. My stalker/harasser posts the bad reviews, and I am sorry about that. They are embarrassingly transparent, grammatically flawed and clearly harassment (they've been documented). It's just another attempt to intimidate me.”

**C.** “I think he thinks I slandered him through my various police reports (In France you have to write things down, beginning with "J'atteste sur mon honneur) or on my blog, but since he was inside my blog (he is a hacker, as well, a former IT Technician) I'm not sure who could believe anything from my previous blogs. This one is safe ... and well monitored. Anyway ... final word, be careful about playing with matches.”

**D.** “To any former student, colleague or friend that was either directly or indirectly harmed by this homophobic villain– you have my most sincere and heartfelt apology. The pain I have felt; the suffering I have endured; and the toll I have paid for this person’s incredibly cruel acts should never have burdened your lives. I miss staying in touch with all of you – however, your well-being is paramount to me. I think of each of you everyday, and I hold you close in my heart and in my prayers.”

**Exhibit 14**

“Unfortunately, in the course of my career I ran afoul of a sociopathic individual who, after being dismissed from school employment, destroyed my career and my life. He invaded every inch of my privacy: email accounts private AND professional, bank accounts, Facebook, every single account I had, and he even invaded the Trinity School server, without their knowledge. From my contact lists and his infiltration into the website of Carney, Sandoe, a placement agency, he sent out the most disgusting and repugnant long (VERY long) emails, about me being a pedophile (HARDLY, since I've

never glanced at a man younger than thirty-five and hairy chested ... well, okay, an exception or two on the hairy chest)"

**Exhibit 15**

"There is only one person in the world for whom I might use the word hate, though I would more accurately say detest. This is a person who willfully and with full knowledge of his actions, violated my private email, banking, Facebook, and other accounts, wrote long letters filled with lies as well as with information he obtained through violation of my privacy ... and who has harassed and stalked me for three years. However, I am not at ease with feelings such as I have for this scoundrel, amoral and criminal though he is. To have violated my privacy, something everyone holds sacred, then to manipulate and use it to interfere with my employment is a criminal offense in the United States. I pray for the strength to see this criminal face justice here or upstairs, when he comes face-to-face with the big guy."

**Exhibit 16**

"Then, after my Amazon page was infiltrated and my reviews tainted by my stalker / harasser, I lost out on a film option ... the friend working with me on that got scared away by my stalker / harasser's apparent religion and the photos I'd shown her. SO ... no film option at the moment, which is too bad, because we were talking big bucks. But people are afraid of my stalker / harasser. As my shrink said, "You've been blackballed." No one wants to touch the "thing" connected to a particular religion. I'm a relatively unknown Salman Rushdie. Really. I should be on Katie Couric's show, which was also my shrink's advice ... to go public in every way about being stalked and harassed, TV and newspaper, the works. However, I've moved on ... trust me, after the Hell of the last three years, caused by an internet stalker / harasser who was fired for good reason from the school of which I was Headmaster, invaded all of my accounts, email and otherwise, including Facebook, and then having violated my privacy used some of that information to interfere with my employment (he also had access to my referees and the my site on the placement agency web), well ... I can weather storms (and illegal criminal mischief)."

15. Defendants continue to defame Plaintiff with additional Google articles attached as

the following exhibits:

- A. "Advice from my desk .." attached as Exhibit 17
- B. "Most homophobic or anti-gay people are gay ... true" attached as Exhibit 18
- C. "I dedicate this to the nurse who took her life in London ..." attached as Exhibit 19
- D. "The world beyond our control ..." attached as Exhibit 20
- E. "Hypothetical, but fear-producing" attached as Exhibit 21
- G. "No personal emails, please ..." attached as Exhibit 22
- H. "For a gay man ... self-love takes years" attached as Exhibit 23

16. Defendants also describe their motive for wanting to harm Plaintiff as derived from discriminatory hatred of Arabs/Muslims, attached as additional posts:

- Exhibit 24) [www.draculadancing.com/2012/07/lets-talk-about-hypocrisy-allez-y-et-de.html](http://www.draculadancing.com/2012/07/lets-talk-about-hypocrisy-allez-y-et-de.html)
- Exhibit 25) [www.draculadancing.com/2012/08/the-new-dangers-of-writing-les-nouveaux.html](http://www.draculadancing.com/2012/08/the-new-dangers-of-writing-les-nouveaux.html)
- Exhibit 26) [www.draculadancing.com/2012/08/i-support-israel-completely-je-soutiens.html](http://www.draculadancing.com/2012/08/i-support-israel-completely-je-soutiens.html)
- Exhibit 27) [www.kerouacandrimbaud.com/2012/11/israel-shares-our-values-we-are-family.html](http://www.kerouacandrimbaud.com/2012/11/israel-shares-our-values-we-are-family.html)

**Defamation and threats published by Amazon Inc. internet products and books**

17. Defendants created several Amazon.com accounts whereby they published/sold defamatory novels about Plaintiff using a variety of different titles and author names, as follows:

- A) [www.amazon.com/M.S.-Simpson/e/B0056TK2XU](http://www.amazon.com/M.S.-Simpson/e/B0056TK2XU)
- E) [www.amazon.com/author/marksutherlandsimpson](http://www.amazon.com/author/marksutherlandsimpson)
- B) [www.amazon.com/Campbell-George-Cardeston/e/B0088NNPZ8](http://www.amazon.com/Campbell-George-Cardeston/e/B0088NNPZ8)
- C) [www.amazon.com/C.-Alcuin-Becket/e/B009V1BYMW](http://www.amazon.com/C.-Alcuin-Becket/e/B009V1BYMW)

18. Defendants published a 146 page novel originally titled “Satan in a Donkey Cart” and then renamed “Mythical Sex in Marrakesh,” “Drink Fire of the Sunshine” and “Core of a Sinking Flame,” all of which contain excerpts and references to Plaintiff that defame him with allegations identical to those appearing on the Google sites referenced previously, including the following excerpts from various versions of these books:

**Exhibit 28**

**Page 10:** “Nine months of hell in bestial, backward, barbaric Marrakesh (forget the tourist brochures, the place is grotesque) ended with her reputation destroyed. This was not hyperbole, it really had been destroyed, not sullied, but shattered beyond recognition, after her nemesis - the kook, as he came to be known - copied and sent out, using her own address book (which included friends, foes, former employers, colleagues, parents, nieces, grandparents, Banana Republic, Air France, literary agents, etc.), emails and phone call transcripts (yes, he monitored and recorded her phone - it's doable), along with his sadistic sexual mythologies about her love life and excerpts from the short stories he (from his point of view) fortuitously found on her computer desktop. He gained access via a proxy server in Spain (that's doable too) and the router in her living room, which apparently he had programmed and thus controlled. Her internet router was the kook's best friend. Worst of all, her public humiliation continued, despite her precipitous departure from Morocco. The flabby, sex-obsessed computer technician hadn't stopped.

There had been another barrage last night. He still haunted her - he might always haunt her. Ophelia knew she'd never had sex with a one-eyed Egyptian pilot named Omar, who tied her up with her own bra and took her in ways she'd never heard of (though some did sound interesting, she had to admit); she knew she never picked up three rough Berber men in the Medina and brought them home for a searingly sleazy four-way - but her grandmother didn't. Her mentally ill nemesis still managed to get access to her personal codes and bombard people with his garbage, changing his own account names frequently enough that people didn't delete them unopened or have them slithered directly into spam folders. He was as clever as Satan, the kook- no, he was Saran. And nothing and no one in hideous Marrakesh had either been able or prepared to stop him, not lawyers, not the apparently well-equipped Gendarmerie Royale - nothing. For all she knew, he worked for them or was related to the Wali- or someone else

**Page 16:** “Though she had sampled more of the danger than the deliciousness, thanks to the obsessive desires of the school's computer technician, whose name in Arabic sounded both feminine and vintage, as if he were a female character from an I Love Lucy episode - though she never repeated his name, not even to people who already knew it (even if it could evoke laughs), and his last name also rhymed with a humorous vegetable, but that too was best left unspoken. Certain things just shouldn't be said aloud and, really, he was Satan. At first, she'd thought he was merely a pot-bellied kook (well, he was a kook and he did have a potbelly) with his scraggly beard and drug-glazed eyes, who asked her out ten times in three days and turned up twice at her apartment. But he turned out to be more than that - much more.”

19. Excerpts from alternative versions of the above-referenced book can be found in the “Mythical Sex in Marrakesh” novel sold on Amazon.com, where the John Doe defendants are clearly referencing Plaintiff by name as attached as **Exhibit 29**:

**Exhibit 29**

**Page 20:** “... episode - though she never repeated his name (Eunice), not even to people who already knew it even if it could evoke laughs, and his last name also rhymed with a humorous vegetable, but that too was best left unspoken (Cabbage). Certain things just shouldn't be said aloud and, really, he was Satan.”

20. Defendant Simpson clearly intends “Eunice Cabbage” to be interchangeable with “Younes Kabbaj.” The authors of this defamation also mock Plaintiff’s name in similar fashion in other defamatory postings where they claim to own a cat named “Cabbage,” attached as **Exhibit 30**. Reviews of Mythical Sex in Marrakesh are attached as **Exhibit 31**.

21. Defendants also maintain their Google blog feeds on the various Amazon and Google profiles, where the original defamatory exhibits attached to this Complaint are also republished on Amazon Author pages and Google+ Profile feeds, and redistributed to various different mass communication email lists including RSS feeds. Attached as **Exhibit 32** are assortments of the various snapshots taken of these various Amazon author pages and biography pages over the time period starting approximately June of 2012, where it is clear that the Defendants constant changing of identities is so prolific, it could not serve to improve book sales but only to evade detection for activity that the authors are aware is clearly illegal.

22. Attached as **Exhibit 33** is another recent (August 2013) snapshot taken of the Defendants Amazon author page and biography which changes almost daily. Again the Defendants are illegally accusing the Plaintiff of the same false allegations including:

“predatory internet attacks, including identity theft, impersonation, scandalous slander, libel and assault, watching himself caricatured on obscene and dishonest web pages, enduring co-option and hijacking of every personal account, seeing his blogs inundated with embarrassing hacked postings either made up or purloined from Simpson's private emails, having his social media compromised and people contacted under false pretenses, having his contact lists used to send out scurrilous, libelous and slanderous mass mailings, and watching helplessly as his computers were pirated.”

These posts appear just for a day or two before being deleted and republished and deleted, countless times over the course of years, without Plaintiff ever being able to properly ascertain the source of the John Does behind the defamatory publications, although they are being facilitated by Google, Amazon and Yahoo consistently for years.

**Additional relevant content**

23. The postings made to these blog sites are too voluminous to add as exhibits to the Complaint, as many of the postings were edited multiple times and during certain periods the

postings reached approximately 20+ postings a day. Many of the postings also provided clues to the identities of the John Does. For example, in one post made in a book sold on Amazon, the John Does make reference to an individual named Pierre Berge, a former Board Member of AST (and releasee named in previous settlement agreement) who Plaintiff is informed and believes is one of the suspected John Does responsible for the recent defamation campaign. This post concerning a eulogy given by Pierre Berge at Yves Saint Laurent's funeral is described below:

**Exhibit 34:** "Yes. Somewhere. I only have virus-ridden flash drives now. I had to throw away my laptop, it was so infiltrated by the straggly-bearded kook that it was basically his ... and half the world. Anyway, the eulogy and probably a Trojan horse virus are on one of the flash drives, I think." "Find it for me, if you can, Phee. It was so beautifully written, like Pierre Berge lamenting Yves St. Laurent ... though between us Pierre Berge has completely lost his marbles of late, if he ever really had any that mattered. Your eulogy was the most moving Moment in Vanessa's funeral."

24. Another article published by the John Does make reference to another individual named Madison Cox, who is a current Board Member of AST (and releasee from the previous settlement agreement) who Plaintiff is informed and believes is another suspect John Doe defendant in this case. This article is attached as **Exhibit 35** at URL:

[www.kerouacandrimbaud.com/2012/12/madison-cox-gay-landscape-architect.html](http://www.kerouacandrimbaud.com/2012/12/madison-cox-gay-landscape-architect.html)

25. Upon information and belief, the Defendants also engaged substantial email, internet and telephone correspondence with numerous third parties that they corresponded with through the Google, Amazon and Yahoo platforms, wherein the sole purpose was to defame and incite violence against Plaintiff and his family, for which they have succeeded as Plaintiff's family received death threats regularly as a result of this criminal incitement, Plaintiff's cousin was illegally kidnapped/detained/tortured by the Moroccan military for 6 months in a Marrakesh prison due to matters related to this litigation. Two of Plaintiff's second-cousins have also been

kidnapped by the Moroccan military and are still in their custody as a result of this conflict which is being manipulated on these defamatory blogs. It is necessary to identify the sources of these communications because these John Does are also responsible for a host of other criminal actions that have been taken against Plaintiffs family in the US and Morocco since 2009.

26. As is clearly shown in the comments section of **Exhibit 7 and 8** and other posts, this defamation was also deliberately targeted to reach individuals associated with AST (a Delaware Corporation) with whom Plaintiff has a previous settlement agreement concerning previous identical defamation that was litigated in case no. 10-431-RGA. This new round of defamation is clearly targeted to reach AST affiliates in both America and Morocco. In **Exhibit 7**, two comments submitted to the offending blogs which were then posted in the comments section are alleged to have been written by employees of AST, confirming that the Defendants are clearly reaching AST employees and affiliates around the world with this targeted activity.

27. The attempts by John Doe defendants to target AST (a Delaware Corporation) and their affiliates all over the world is deliberate because the offenders are clearly aware this type of threat against Plaintiff via AST causes direct physical harm to Plaintiff's family in Morocco by forcing his family into continued and sustained conflict with the Moroccan military officials implicated in misconduct concerning these matters. The kidnapping and torture of Plaintiff's cousin was covered by numerous media organizations in Morocco, as his abduction and unlawful incarceration came about after numerous unsuccessful attempts to settle a multitude of criminal/civil cases related to these matters.

28. Defendants also targeted their defamation of Plaintiff at specific internet forums intended to reach Moroccans and other individuals associated with AST, such as this entry they

posted on yet another internet site targeting readers specifically located in Morocco, attached as **Exhibit 11**. Defendants also post messages on the Google blogs specifically targeting students at AST, as is shown in other posts attached as **Exhibit 12**, despite the fact that the blog authors are aware these sites are not appropriate viewing for children.

29. Defendants also falsely accuse Plaintiff of suffering from repressed homosexual dysfunction, manifesting in some obsession with stalking homosexuals. All these false claims published by the Defendants are also defamatory because they assert Plaintiff is committing infidelity against his female companions by cheating on them with members of the same sex. Women clearly have a right to know if their significant other is experiencing same-sex attractions, especially if such proclivities factor into providing consent to engage in sexual relations. The type of women that Plaintiff has had relationships with would never engage sexual relations with a bi-sexual or homosexual man, so malicious allegations by the Defendants accusing Plaintiff of being homosexual are akin to accusing Plaintiff of committing infidelity against his significant others, or of having some loathsome disease (as many women see homosexuality as a type of loathsome psychological disease like necrophilia or pedophilia).

30. Defendants also openly states that the religion of Islam completely disgusts them (disregarding that Plaintiff is inclusively Jewish/Christian/Muslim), and they provide hundreds of pages of literary content that give clear insight into the minds of the John Does regarding their motivation for wanting to harm the Plaintiff based upon a false claim that he is some type of Islamic super-militant radical on a mission to kill all gays. It was already established in previous litigation that Plaintiff will only consider assassinations of individual gay rapists/pedophiles that



specifically attempt to commit sexual-themed crimes directly against him. Several posts by Defendants admit bias against Plaintiff because of his religion attached as **Exhibit 36** by stating:

**Exhibit 36**

**A.** “I’m a normal person, in that I am not free of certain prejudices or biases. I admit this upfront. I believe everyone is biased. For me, my chief problem is with Islam, which I cannot abide. I’m working on it.”

31. Defendants publish large amounts of soft-core pornography (that they declare to be art) depicting young men in various stages of nudity with private parts visible, and videos of sexual groping and kissing between men, including another blog titled kabukiandshirtless.com (which has subsequently been removed), and others similar in content. Defendants also author graphic depictions of sex under the guise of ‘literature’ in numerous hardcover books and internet products, and some drafts of the material include under-age sex, sex between teachers and students, rape and other indecent acts.

32. Defendants also operate RSS feeds of their Google/Amazon products where subscribers can receive their products and posts via email and other means, in real time as they are posted. This technical ability of Google/Amazon to disseminate the defamatory content thereby allows for mass distribution of these products to thousands of people. Subscriptions surpassed over 50,000 for some of the blogs before they were eventually deleted.

**Defamation and threats published via Yahoo! Inc. internet products and/or email facilities**

33. Plaintiff also documented numerous emails hosted by Yahoo Inc. that purport to be owned by the authors/publishers of the content appearing on Google and Amazon, including ‘esprit\_litteraire@yahoo.fr,’ ‘middle\_mist@yahoo.fr,’ ‘roundmountainpress@yahoo.com’ and others. After litigation was filed against a defamation suspect, Plaintiff began to receive additional threatening emails from Yahoo accounts linked to the Google/Amazon sites.

34. On December 4<sup>th</sup>, 2012, Plaintiff received an email from 'wilmslow\_road@yahoo.fr' purporting to be from the author of the defamation using an email signature bearing the name Mark S. Simpson. In this email, the John Doe author going by the name of Mark S. Simpson taunts Plaintiff and sends him a second email to stating he/she didn't send the first email, but that his/her account had been 'hacked' by Plaintiff. Because this second email reply was cc'd to attorneys and Board member of AST, this email stands as an act of defamation on its own, as it falsely accused Plaintiff of illegally accessing email accounts operated by these John Does. This is similar to the posts made on Google/Amazon that claim the authors did not publish the defamatory content appearing on the sites, but that their accounts at Google/Amazon were 'hacked' and that some unidentified third party (or Plaintiff himself) posted the content.

35. On April 7<sup>th</sup>, 2013, Plaintiff received an email death threat from 'messagetoyounes@yahoo.ie' referring to matters consistent with the theme of the defamation. This email is threatening Plaintiff with everything from death to false imprisonment. This email also threatens Plaintiff with financial ruin and includes a threat against Plaintiff's mother, who the Defendants had illegally stalked and conducted surveillance against while she worked at a local strip mall. After Plaintiff's mother resigned her position at the mall as a result of the threat, Defendants then left another death threat atop Plaintiff's mother's car. Defendants had been conducted similar death threats against Plaintiff and his family for years since 2009.

36. On April 20<sup>th</sup>, 2013, Plaintiff received another death threat email from 'saint\_joachim@yahoo.ca' referring to matters related to their defamation campaign. The email references a threat that Plaintiff is on a 'hit list' of people that are being targeted by the Defendants with illegal subversive activities. The existence of this list is verified as since the

moment Plaintiff had come into conflict with Defendants in 1987 (after reporting their leader for illegal molestation activity), these Defendants and their Hollywood supporters have thereby shadowed Plaintiff throughout his life for decades and launched many bizarre attacks against him for over 26 years since the conflict began.

37. The Defendants have registered dozens of Yahoo email addresses showing a clear preference for this email platform and the sophistication/security it provides to engage these ‘anonymous’ illegal threats and defamation against Plaintiff. All these death threats have been forwarded to FBI without response due to the fact that the suspected John Doe defendants are clearly politically-connected as they claim in their blogs. The Defendants have shown ability to suppress any federal investigation into their conduct confirming they have co-conspirators inside the US government helping them evade arrest by obstructing Plaintiff’s attempts to report them. The previously described emails are attached as **Exhibit 41**.

**Conclusion**

38. ISP Defendants and John Does wielded sophisticated internet news/media/email products to facilitate the spreading of defamatory communications about Plaintiff to millions of people. By reason of the per se defamation engaged against Plaintiff by Defendants, Plaintiff has been forced to suffer impairment of his good name, public embarrassment, humiliation, impairment to his professional reputation, public impairment of his abilities and integrity, anxiety, public ridicule, loss of past and future employment, mental pain and anguish, and additional damages. An affidavit concerning the Defamation is attached as **Exhibit 37**.

**AS AND FOR A FIRST CLAIM**

**Declaratory and Injunctive Relief**

39. Plaintiff repeats the averments of paragraph 1 through 38 as if fully set forth herein.

40. By reason of the foregoing, the John Doe Defendants malicious defamation and threatening communications, which they caused to be published via the ISP Defendants internet facilities, constitute libel per se for which all Defendants are answerable for damages under Delaware State law.

41. That this Court order ISP Defendants, Google Inc., Amazon Inc. and Yahoo Inc. to immediately provide to Plaintiff all evidence in their possession that will help identify the John Does defaming and threatening Plaintiff via their facilities. Plaintiff also asks this Court to order the ISPs to provide the IP/Mac Address used to publish each defamatory communication cited in this complaint. If an IP/Mac Address address used by a John Doe to publish a defamatory article cited in this Complaint is not sufficient to identify the John Doe, then the Court should order the ISPs to also provide any information given to register the accounts with the ISPs, or any other information that could help identify the publisher of each individual communication, as preliminary investigation by Plaintiff concerning possible IP addresses involved in the defamation indicate that there are multiple Defendants spread out over several countries. The Court should also order the ISPs to provide Plaintiff any statistical information gathered by them concerning each defamatory communication, including the number of hits for each webpage, locations (but not identities) of viewers, number of defamatory books sold and income generated.

42. In the event that the ISPs are not in possession of any records that could help to identify the John Does that operated these accounts, that this Court immediately order ISPs to disclose to Plaintiff all external entities that had access to their equipment to be able to intercept/record data related to the accounts identified in this Complaint, and to disclose any

cooperation between ISPs and external entities, including but not limited to government agencies, where the cooperation allows these external entities the ability to also capture data streams passing through the ISPs that could identify John Doe defendants which are defaming and making threats against Plaintiff.

**AS AND FOR A SECOND CLAIM**

**Tortious Interference with Contract**

43. Plaintiff repeats the averments of paragraph 1 through 38 as if fully set forth herein.

44. By reason of the foregoing, John Does are tortuously interfering with a previous settlement contract reached between Plaintiff and AST in case number 10-431-RGA by attempting to induce both parties into violating the Contract which cannot sustain under Plaintiff's inability to obtain information concerning the identity of the John Does defaming and threatening him. ISP Defendants are also engaging tortious interference with the contract if they do not immediately act to provide all information necessary to identify the John Doe Defendants.

45. Plaintiff is requesting \$1,000,000 from the John Doe Defendants for tortuously interfering with this previous settlement agreement, which has cause Plaintiff to incur substantial damages to his ability to return to Morocco due to the collapse of the settlement causing Plaintiff to once again fall into conflict with the Moroccan military due to matters related to this litigation.

46. In the event that the ISP Defendants are unable to provide identifying information concerning the John Does that operated accounts they hosted which are the subject of this Complaint, or if the ISPs are found to be negligent in their obligation to maintain records of individuals that use their facilities to publish material onto the internet, Plaintiff is thereby requesting an additional \$1,000,000 from the ISPs for tortious interference with Plaintiff's

settlement contract due to the fact that their products are defective by virtue of being designed in any way that does not take every reasonable step to minimize the ability of anonymous individuals being able to use these advanced internet media publication products to post anonymous defamation.

### **AS AND FOR A THIRD CLAIM**

#### **Negligent and Intentional Infliction of Emotional Distress**

47. Plaintiff repeats the averments of paragraph 1 through 38 as if fully set forth herein.

48. By reason of the foregoing, the actions of the ISP Defendants in failing to secure their facilities to prevent John Does from publishing false and defamatory communications concerning Plaintiff constitute negligent infliction of emotional distress. The ISP Defendants should not allow any individuals the ability to publish articles using their facilities, without first verifying that the content of the published material is not defamatory. In the event that the ISP Defendants are also found to be negligent in their duty to verify, to a reasonable standard, the identity of users of their advanced blog products, the actions of the ISP Defendants would also be negligent in allowing users the ability to operate a blog in such a manner whereby a user cannot be directly identified for service of process in the event such a user publishes defamatory content that the ISP Defendants are not capable of screening before final publication is made via the ISP's facilities. Plaintiff is willing to forgo any financial compensation from the ISP Defendants in the event they are able to produce evidence that can identify the John Doe Defendants, but in the event that they are found unable to produce any evidence concerning the identities of the John Doe defendants because they failed to implement procedures (such as telephone verification), before allowing users to register accounts such as the ones cited in this

Complaint, then Plaintiff is requesting \$1,000,000 from the ISP Defendants as compensation for Negligent Infliction of Emotional Distress.

49. Plaintiff is also requesting \$1,000,000 in damages for Intentional Infliction of Emotional Distress from the John Doe Defendants, because it is clear that their actions are deliberate, intentional and designed to harm the defendant with violence if possible.

**AS AND FOR A FOURTH CLAIM**

**Damages for Libel per se**

50. Plaintiff repeats the averments of paragraph 1 through 38 as if fully set forth herein.

51. By reason of the foregoing, John Doe Defendant's malicious and willful defamatory published statements have damaged the Plaintiff and are actionable for damages under the law of the State of Delaware.

52. Accordingly John Doe Defendants should be held liable for damages to the Plaintiff in a sum exceeding \$75,000 and yet to be determined by a jury.

53. In the event that the ISP Defendants are unable to provide Plaintiff any information concerning the proper identities of the John Doe Defendants, Plaintiff is also asserting that the ISP Defendants are additionally liable for damages to the Plaintiff for libel in a sum exceeding \$75,000 and yet to be determined by a jury.

**PRAYER FOR RELIEF**

WHEREFORE Plaintiff respectfully demands this court enter judgment in its favor and against Defendant Simpson as follows:

1. Ordering the ISP Defendants to immediately provide all evidence in their possession that will identify the John Doe Defendants, and enjoining the ISP Defendants from allowing the

John Doe Defendants any future access to their facilities, and ordering the ISP Defendants and the John Doe Defendants to immediately remove any remaining defamatory statements still contained on the offending products, and ordering the ISP Defendants and/or the John Doe Defendants to print retractions of their Defamatory publications, and to remove from sale any novels containing defamatory allegations attributable to the Plaintiff.

2. Awarding on the Second and Third Claim for such compensatory and punitive damages for the Defendants tortious interference with the 2012 Contract in the sum of at least \$1,000,000.

3. Awarding on the Fourth Claim, such compensatory and punitive damages, inter alia for emotional distress and loss of reputation of at least \$1,000,000, or any sum as the jury may impose.

4. Granting such other and further relief as the Court deems just and proper, including the costs of this action and investigative costs associated with gathering evidence in this case.

#### **JURY DEMAND**

Pursuant to Federal Rule of Civil Procedure 38(b) Plaintiff hereby respectfully demands a trial by jury of all issues triable of right by a jury.

Respectfully submitted this 28<sup>th</sup> day of August, 2013

/s/ **Younes Kabbaj**  
Younes Kabbaj PRO SE  
1844 N Nob Hill Rd #222  
Plantation, FL 33322  
[jonahkabbaj@gmail.com](mailto:jonahkabbaj@gmail.com)  
561-223-9777



# Exhibit 38



Sign in

# Mark Simpson

Add to circles



Posts

**About**

Photos

Videos

### Tagline

I'm a nice guy, first and foremost: gentle, loving, kind to animals, especially hunky ones in jeans! I like to laugh and have fun, and equally I like to be quiet and work on my writing. / Je suis un gars très sympa: douce, aimante, gentil aux animaux, en particulier ceux poilu qui porte le jeans ! J'aime rire et s'amuser, et aussi je voudrais être calme et travail sur mon écriture.

### Introduction

My favorite color is blue, I like strong and masculine men who are also kind; I'm a family-oriented person, and definitely a one-man dog! / Ma couleur préférée est le bleu, j'aime les hommes forts et masculins qui sont aussi gentils ; Je suis une personne axée sur la famille et certainement quelqu'un que sois fidèle et dévotement à un homme

### Bragging rights

I am a total egghead on the surface, good grades in school, Ph.D. with Distinction, many, many awards from Phi Beta Kappa to being one of only fifty Fellows of the Library of Congress. However, I'm a simple boy at heart and proudest of little things in my life, like raising my cat, my plants, my view over rooftops./Je suis un intello totale sur la surface, de bonnes qualités à l'école, Ph.D., avec Distinction, prix beaucoup, comme de Phi Beta Kappa à l'un des seuls cinquante Fellows de la Library of Congress, etc. Cependant, je suis un garçon simple au cœur et fiers des petites choses dans ma vie, comme élever ma chatte, mes plantes, ma vue sur toits. !

### Occupation

I'm a writer / je suis un écrivain

### Employment

Moi-meme (self)  
L'écrivain (writer)

### Education

University of Leeds  
University of California, Riverside

### Gender

Male



Worked at **Moi-meme (self)**

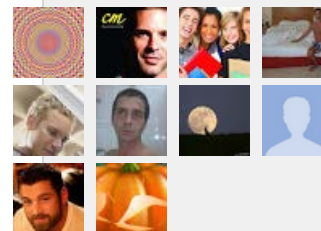


Attended **University of Leeds**

### 1,020 IN HIS CIRCLES

- Radhika Sharma
- Federico Wiem...
- Luis Guto
- Alexei Genova
- Paolo Gav
- Aaron Haas

### 261 HAVE HIM IN CIRCLES



Report / block Mark

Settings ■ Help ■ Send feedback

# Exhibit 39

## Mark Sutherland Simpson



### My blogs

[Eliza's Orange](#)

[Mark Sutherland Simpson](#)



[View Full Size](#)

On Blogger since  
May 2012

Profile views - 77

### About me

Gender **Male**

Industry **[Publishing](#)**

Occupation **[Writer](#)**

Location **[Paris, Ile de France, France](#)**

#### Introduction

First and foremost I love literature; I live for my writing, and reading two or sometimes three books a week. No kindle allowed in this home! I travel a fair amount, and am anxious to settle in one place. New York will always be home. However, I love Paris, Melbourne, San Francisco, Portland, Quebec City and Mexico City. Also, I like being gay ... sometimes I watch a man just doing something, like feeding the parking meter, and I'll think, "I really like men, the way they move, stand, behave. It's a good thing I'm gay." I'm a normal person, in that I am not free of certain prejudices or biases. I admit this upfront. I believe everyone is biased. For me, my chief problem is with Islam, which I cannot abide. I'm working on it.

#### Favorite Books

[I love The Shooting Party \(Isabel Colgate\)](#), [Madame Bovary \(Flaubert\)](#), [Brideshead Revisted \(except for the anti-semitic part, by Evelyn Waugh\)](#), [Annam \(Christophe Bataille\)](#), and finally [On The Water \(H.M. van den Brink\)](#)

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# Exhibit 40



## Mark S. Simpson



[View Full Size](#)

On Blogger since  
October 2012

Profile views - 19

### My blogs

[.If Kerouac and Rimbaud were lovers: The modern gay man's blog](#)

### About me

Gender [Male](#)

Industry [Publishing](#)

Occupation [Writer](#)

Location [New York / Paris](#)

Introduction [I'm a cool guy, nice and rather shy, who has been bashed around a little by life. So, I can't say that I've lived out the American dream. That said, I'm generally chipper, upbeat and \(at least to myself\) witty.](#)

Interests [Music, especially French contemporary.](#)

Favorite Movies [Les parapluies de Cherbourg](#)

Favorite Books [To the Lighthouse, Past Imperfect, Eleven, High Fidelity](#)

Why does the taste of pennies remind you of losing a tooth?

I can't remember ever tasting a penny, which makes sense ... I'm not keen on putting things like coins and other bacteria-ridden objects in my mouth. I do remember losing my teeth as a boy, and being skeptical (I was always a tad precocious) about the tooth fairy, since he or she gave me less than my friend Dennis for the same size tooth!

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# Exhibit 41

**theletter@aol.com**

---

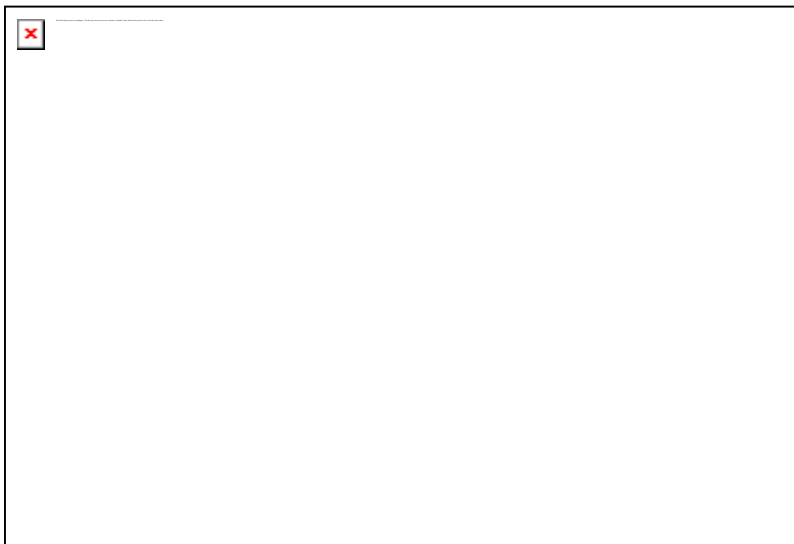
**From:** Identité particulière / Private <wilmslow\_road@yahoo.fr>  
**Sent:** Tuesday, December 04, 2012 4:53 PM  
**To:** reward@marksutherlandsimpson.com  
**Cc:** larry.seegull@jacksonlewis.com; yahyarouach@yahoo.co.uk  
**Subject:** Re: I'm in New York ... and you know it.

How dare you write to me. How did you get this address and why are you sending such a lengthy diatribe to me?

You make up fake emails from me and then answer them??? Good grief.

---

**Mark S. Simpson**



*You cannot find peace by avoiding life.*

*- Virginia Woolf -*

*Vous ne trouvez tranquillité en évitant la vie.*

**De :** "reward@marksutherlandsimpson.com" <reward@marksutherlandsimpson.com>  
**À :** 'Identité particulière / Private' <wilmslow\_road@yahoo.fr>  
**Cc :** larry.seegull@jacksonlewis.com; yahyarouach@yahoo.co.uk  
**Envoyé le :** Mardi 4 décembre 2012 16h45  
**Objet :** RE: I'm in New York ... and you know it.

Mark Simpson,



I do not wish to have this conflict with you outside of a courtroom. From Morocco until today I have consistently sought to have a court mitigate this issues that have developed between us because of your discriminatory hatred of me, but at every turn you have chosen to flee the court proceedings you provoked with your unlawful activities against me.

You need to obtain an attorney and respond to the most recent complaint, originally filed against you in Southern District of New York, which was thereby transferred to Delaware District Court due to the terms of the settlement agreement I reached with AST which required me to go through Delaware to sue you for any new violations of the settlement agreement. You can find all the case information on the marksutherlandsimpson.com website, and you can download extra copies of the complaint to compliment the two that were already served upon you in Portland and New York (for which your deadline to answer is just a few days away).

Don't think for one moment that you can evade this court process, or otherwise prevent me from obtaining a legitimate judgment against you in a court of law since it is clear that you have not yet overcome your obsession to harm me. I am well versed on technology matters and am conducting a world-class internet investigation to preserve, maintain and obtain evidence regarding your new round of crimes. I am using a professional third party forensic investigator to collect and document all the web postings you have made and deleted in the past several months, and you are causing me to incur substantial costs to maintain this investigation of you, and these investigative costs have already run into the thousands. I just hope you know that it doesn't matter that you delete your posts, I have 24/7 monitoring on all your sites and the second something goes up, it gets archived into an evidence locker. In fact, if you change just one word on any of your posts and repost them, I will get an alert telling me that a post has changed. I am fully aware of every single thing you have posted up about me on any of the sites you controlled since the day I was again alerted to your most recent activity.

All this evidence is being collected by a third party computer forensics litigation support specialist and the evidence is being held in a digital evidence locker (which I am now forced to pay monthly storage fees to maintain) just to ensure you cannot attempt to claim in Court that I have tampered with evidence, as you constantly have been claiming from afar. Don't think that the technicalities and complexities related to an internet case will prevent me from bringing you to justice. I will be able to lay a foundation for all evidence I seek to submit to the courts and should you show up to court seeking to deny the defamation, you will very quickly sabotage yourself even worse than all the self-sabotage you have forced upon yourself by continuing to pursue me in an unlawful manner. I have not even started with my subpoenas and other discovery tools that I will utilize to further document these matters. I even have leads on your activities through my website, and have acquired additional information from people responding to the website from all over the world including Ireland, France, California and to New York. I also had process servers attempt to serve you at your "book readings" in Australia (before I finally located you), and they told me that the book readings were all fake and that there were no such events occurring at the universities you listed in your fictitious book tour.

Please don't make me start approaching your friends and family to ask them for help in getting your cooperation with this court process. I understand that you are claiming to have mental disorders. If this is the case then I don't mind settling my claims against you in a fair way, but you must print retractions on all your websites exonerating me of your allegations so that your readers are apprised of it, and you must perform other acts to ensure that I am no longer subjected to unlawful activity due to your mental issues. Since you are refusing to appear in court, you are risking me sending certified mail to everyone else you know (including sister, brother, friends from California and others that I have been able to track down) just to continue to gather a record of your refusal to respond to the court process. If you think that the best strategy is to just evade the court process and perhaps show up to a court several years later after I finally start to lien your property, hoping that by that time evidence is no longer available or the case is harder to pursue, you are wrong. I am going to meticulously close every possible back-door you could use to evade being held to account for your crimes, and I am diligently doing this as we speak.

Mark, I really don't care what you want to do with your life. I am not to blame for your inability to pursue a career in education. You are entirely to blame for that and quite deservedly so. If you want to now reinvent yourself as a soft-porn gay blog author, I could care less. What you cannot do, however, is defame me on your websites and in your

books. You are lucky you are not in jail for all what you did, and to then pop up again defaming me after I finally allowed you to walk away in one piece just earlier this year (at the behest of the school), is like adding insult to injury and it will not be tolerated.

Younes Kabbaj

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**From:** Identité particulière / Private [mailto:wilmslow\_road@yahoo.fr]

**Sent:** Tuesday, December 04, 2012 3:16 PM

**To:** reward@marksutherlandsimpson.com

**Subject:** I'm in New York ... and you know it.

So, do I get the money for turning myself in?

I'd be careful about posting things at the moment. You know the old rule about these things ... for once thing, you have incorrect books there, and you have a book published by Slavica Press, not self-published ... and my master's thesis, which was never published. I'd love to see it published. Also, a book published by a registered company may or may not be self-published, it's a gray area.

Enough with the silly website, don't you think? Really? It's a bit weird.

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**Mark S. Simpson**



*You cannot find peace by avoiding life.*

*- Virginia Woolf -*

*Vous ne trouvez tranquillité en évitant la vie.*

**jonahkabbaj@gmail.com**

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**From:** Message to Younes <messagetoyounes@yahoo.ie>  
**Sent:** Sunday, April 07, 2013 9:56 AM  
**To:** My Man <jonahkabbaj@gmail.com>  
**Subject:** Message

We are former colleagues, staff, students and current friends of Dr. Simpson. We have been watching all the needless pain and suffering that you have caused Dr. Simpson through your complete lies, fabrications and bogus exhibits. We have faith in the judicial system and we know that Dr. Simpson will prevail.

However, be clear about a few things:

1. Though he does not yet know it, we have started a trust fund for Dr. Simpson's defense. It is growing by the day. We will make sure that he can successfully defeat you in all 50 states, in any district court or any other venue that you bring legal action against him. Our trust funds will assure that he has the best possible defense team against all of your lies from now until hell freezes over;
2. We are setting up a separate trust fund for your former employer, AST.
3. We will soon reach out to Dr. Simpson and AST to encourage them to begin proceedings against you to recoup every ill gotten gain you have ever received. Yes, we can and we will do everything in our power to see that you live out your life either penniless, or the run from the authorities (or both).
4. The single MOST important item for you to note: Under the best circumstances, you will do us all a favour and simply drop dead. However, we will be happy enough if you just get thrown back in prison and they throw away the key.

Let us be clear: Stopping you in Delaware is only the first step. We will make sure that the full breadth of legal action is taken against you. There is nowhere to hide from legal justice.

Never, has the been a more useless or poor excuse for a human being on this planet. Do humanity a favour - go play on the freeway.

Thanks for providing your email (what a wanker) on the NY complaint you attached to <http://www.marksutherlandsimpson.com/>. It is refreshing that a lowlife like you know that we are on to you.

We are everywhere - maybe even at the strip-mall. Talk with you soon.

**jonahkabbaj@gmail.com**

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**From:** saint\_joachim@yahoo.ca  
**Sent:** Saturday, April 20, 2013 3:37 PM  
**To:** jonahkabbaj@gmail.com; jonah.kabbaj@gmail.com  
**Subject:** So ...

it can't be stalking and evading at the same time. Oh dear. You seem to have painted yourself into a corner with that one, as well as violated the persons' with disabilities act. Poor thing. It just gets worse and worse.

Don't you think it's time to just be quiet and ... you know ... go away and just be a check-out clerk at Walmart or something?

So many fundamental contradictions are befuddling. People taking medication that prevents an erection don't have sex ... so why would they need a prostitute? And what would they do with that prostitute? Very weird ... well, that part is not surprising, you define weirdness. I imagine your life has been sad and that you have been constantly teased and tormented because of your strange and peculiar ways. Certainly everyone who has met you thinks you're weird ... so either everyone is wrong or ...

You are such a worthless human being, which I know you know. Worthlessness stares you in the face every morning.. Can't you find some way to do something productive to do with your life? Or is preying upon peoples' and instutional resources your only sense of how to make a living? Sad, so sad.

According to the Moroccan Consulate in New York there are no arrest warrants for any crimes in Morocco for the people you mention ... you, however, are on what is described as "the list." You don't suppose you're lying do you? My G-d ... that wouldn't be like you at all, would it ??? In any event, the Consul General is most gracious, and one is quite reassured by him that the welcome mat is out in Morocco for all and sundry EXCEPT you ... so, going there for a vacation sounds like fun !

You know you're mentally ill, I hope. Because you are mentally ill ... seriously and utterly.