

FILED 04 MAY '11 11:35 USDC-ORP

United States District Court  
for the  
District of Oregon

Obsidian Finance Group, LLC  
and Kevin D. Padrick

\_\_\_\_\_ )

Plaintiff

)

) Civil Action No. CV 11-0057 HA  
Demand for Jury Trial

v.

Crystal Cox, )

\_\_\_\_\_ )

Defendant

V.

Crystal Cox, )

\_\_\_\_\_ )

Counter Plaintiff

)

) Civil Action No. CV 11-0057 HA  
Demand for Jury Trial

v.

Obsidian Finance Group, LLC  
and Kevin D. Padrick )

\_\_\_\_\_ )

Counter Defendant

Counter Complaint

For Complaint against Counter Defendants David Aman, Esq Personally and Professionally, Tonkon Torp Law Firm and all partners, associates and of counsel in their professional and individual capacities, Obsidian Finance LLC and any/all affiliates, Kevin Padrick Esq. officially, professionally and personally, David Brown Esq. professionally and personally, Ewan Rose Esq. officially, professionally and personally, Patrick Flaherty Esq., Bend Oregon District Attorney Office officially, professionally and personally capacities, Deschutes County, Stephanie DeYoung, CPA Studebaker-DeYoung CPA PC - Stephanie Studebaker LLP , Mark Neuman, Lane Lyons, Brian Stevens, Tim Larkin, Summit Accomodators Inc. and any and all affiliates, Sean Boushie, Lincoln County Montana District Attorney Bernie Cassidy, P. Stephen Lamont, CEO of iViewit Technologies Inc, Robin Clute Personally and Professionally, and John and Jane Does.

For this Complaint against named counter defendants, counter plaintiff Crystal Cox alleges as Follows:

Parties

1. David Aman, Esq. Personally and Professionally and Tonkon Torp Law Firm. Oregon Resident. David Aman, Esq. Personally and Professionally, Tonkon Torp Law Firm officially in its capacity associated with the Oregon Bankruptcy of Summit Accomodators LLC in the U.S. Bankruptcy Courts.
2. Obsidian Finance LLC and any/all affiliates, Kevin Padrick Esq., Oregon Resident, officially, professionally and personally. Officially in its capacity associated with the Oregon Bankruptcy of Summit Accomodators LLC in the U.S. Bankruptcy Courts.
3. Obsidian Finance LLC and any/all affiliates, David Brown. Esq. , Oregon Resident, officially, professionally and personally. Officially in its capacity associated with the Oregon Bankruptcy of Summit Accomodators LLC in the U.S. Bankruptcy Courts.
4. Obsidian Finance LLC and any/all affiliates, Ewan Rose Esq. , Oregon Resident, officially, professionally and personally. Officially in its capacity associated with the Oregon Bankruptcy of Summit Accomodators LLC in the U.S. Bankruptcy Courts.
5. Patrick Flaherty Esq., Bend Oregon District Attorney officially, professionally and personally capacities. Oregon Resident.
6. Deschutes County Oregon

7. Stephanie DeYoung, Oregon Resident CPA Studebaker-DeYoung CPA PC - Stephanie Studebaker LLP personally and professionally.
8. Mark Neuman, Oregon Resident Summit 1031 Principal, Summit Accomodators Inc. personally and professionally.
9. Lane Lyons, Oregon Resident Summit 1031 Principal, Summit Accomodators Inc. personally and professionally.
10. Tim Larkins, Oregon Resident Summit 1031 Principal, Summit Accomodators Inc. personally and professionally.
11. Brian Stevens, Oregon Resident Summit 1031 Principal, Summit Accomodators Inc. personally and professionally.
12. Sean Boushie, Montana Resident.
13. Lincoln County Montana District Attorney Bernie Cassidy
14. P. Stephen Lamont, CEO of iViewit Technologies Inc. , a Delaware / Florida Company.
15. Robin Clute Personally, Professionally and in her official capacity.
16. Proskauer Rose Law Firm
17. Any and All Jane and John Doe(s)

Jurisdiction

18. The Court has subject matter jurisdiction in this action pursuant to 28 U.S.C. 1332.

Counter Plaintiff is subject to personal jurisdiction in this Court because Counter Defendant filed in this jurisdiction.

Venue

19. Venue lies in this district pursuant to 28 U.S.C. 1391 (a) (2).

General Factual Background

**On information and Belief Counter Plaintiff Alleges the Following:**

Counter Plaintiff has over 400 Blogs and is "Media". Counter Plaintiff has been an Investigative Journalist / Investigative Blogger for approximately 5 years.

Counter Plaintiff has written on a variety of whistleblowing and criminal cases including but not limited to the following:

iViewit Stolen Technology Case

iViewit Holdings Inc.

Michael Grebe

Bradley Foundation

Proskauer Rose Law Firm

Tom Petters Bankruptcy

Kodak Bankruptcy

SGI Bankruptcy

Tim Blixseth Bankruptcy

Allan Stanford Lawsuit

Montana Corruption Cases

Time Warner Inc.

USPTO

SEC

JP Morgan

Neuberger Berman

Goldman Sachs

Sussman Shank

Foley and Lardner Law Firm

WR Grace Bankruptcy

WR Grace Asbestos Victims

Florida Supreme Court

New York Supreme Court

Montana Supreme Court

Enron Bankruptcy,

Internet Media is what Counter Plaintiff does for a Living. Counter Plaintiff is a sole

proprietor based out of Montana.

Counter Plaintiff has published posts out of several states over 5 years and has other Authors and Publishers from Various States.

Counter Plaintiff started Writing articles on Blogs about the Summit 1031 Bankruptcy around Jan of 2009 as part of Counter Plaintiff's Real Estate Industry whistleblower Investigative Journalism Writings.

On July 17th 2009 Counter Plaintiff started <http://www.ObsidianFinanceSucks.com>, hereby incorporated herein by reference in entirety.

Obsidian Finance LLC computer servers were logged on to Counter Plaintiff's blog immediately after publishing, and further counter defendant David Aman of Tonkon Torp on behalf of Counter Defendant Kevin Padrick of Obsidian Finance, as trustee in Summit Accommodators, Inc., an Oregon corporation, dba Summit 1031 Exchange, Summit Accomadotors U.S Bankruptcy Court proceedings, (Case No. 08-37031-rid II), hereby any and all incorporated herein by reference in entirety. David Aman, Tonkon Torp Law Firm on behalf of Kevin Padrick Obsidian Finance Group LLC Deposed Summit 1031 whistleblower Stephanie DeYoung in August of 2009 and inquired about, Investigative Blogger Crystal L. Cox, Counter Plaintiff memorializing counter defendants Ewan Rose, Tonkon Torp, David Aman, Kevin Padrick, Obsidian Finance LLC, knowledge of Counter Plaintiff's blogs regarding the Summit 1031 Bankruptcy.

Since counter defendants had knowledge of such blogs over the one year statute of limitations and being certified lawyers, the filing of their original complaint is alleged to be part of counter defendants conspiratorial activities and continued harassment.

Counter Plaintiff bought <http://www.ObsidianFinanceSucks.com> site due the TaubmanSucks.com Court Case setting precedence in the court case cited below.

Information on the TaubmanSucks.com Intellectual Property Lawsuit.

<http://www.taubmansucks-thebook.com/>

<http://www.taubmansucks.com/Act117.pdf>

TaubmanSucks.com court case transcript

The **TaubmanSucks.com** case is a State of Michigan Case, Attorney name Douglas Sprinkle - Intellectual Property Lawsuit.

Name of Court: US District Court ED Michigan Southern Division **Case # 01-72987**

Name of Court: US Court of Appeals, Sixth Circuit **Case # 01-2648, 01-2725**

Counter defendant David Aman, on behalf of counter defendant Obsidian Finance Group, Deposed counter defendant Oregon CPA Stephanie DeYoung in a Video taped deposition questioning her about counter plaintiff Whistleblower Media Blogs. counter defendant Oregon CPA Stephanie DeYoung was Deposed on August 25th 2009.

The Following URL's are Videos of Stephanie DeYoung being Deposed on how Counter Plaintiff was involved in the Summit 1031 bankruptcy case. Counter defendant David Aman of Tonkon Torp is Questioning Stephanie DeYoung.

Part One of Deposition of Stephanie DeYoung Regarding Blogger Crystal L. Cox, Counter Plaintiff

[http://www.youtube.com/watch?v=\\_Jm4RuZ77bU&feature=channel\\_video\\_title](http://www.youtube.com/watch?v=_Jm4RuZ77bU&feature=channel_video_title).

Hereby Incorporated in entirety by reference herein.

Questions on Crystal Cox, Blogger Start At 1 minute 15 seconds

Part Two of Deposition of Stephanie DeYoung Regarding Blogger Crystal L. Cox, Counter Plaintiff

[http://www.youtube.com/watch?v=6M9BC67e0us&feature=channel\\_video\\_title](http://www.youtube.com/watch?v=6M9BC67e0us&feature=channel_video_title)

Hereby Incorporated in entirety by reference herein.

Counter Defendant David Aman Tonkon Torp and Counter Defendant Kevin Padrick Obsidian Finance want to silence counter plaintiff blogs as they Expose Corruption and contain information that the public has a right to know about the alleged criminal activities.

Counter Defendant David Aman, Tonkon Torp, Obsidian Finance LLC and Kevin Padrick are harassing Counter Plaintiff Crystal L. Cox to Stop the Truth coming out about Government Fraud in a Federal Bankruptcy Proceeding. In doing So, XXX has defamed Counter Plaintiff Crystal L. Cox, Investigative Blogger. XXX is involved in Harassment and Conspiracy with other defendants against the Rights of counter plaintiff in a Federal Court.

On **Jan 14th 2011** Counter Defendant filed a defamation complaint with the U.S. District Court of Oregon and Counter Plaintiff was served on **March 17th 2011**.



WEDNESDAY, **JANUARY 26, 2011** counter plaintiff became aware that counter defendant David Aman of Tonkon Torp Filed a Lawsuit against me on behalf of counter defendants Obsidian Finance LLP and Kevin Padrick. The frivolous lawsuit was posted online at counter defendant Sean Boushie's blog <http://seanmboushie.blogspot.com/>, hereby incorporated in it's entirety, and further was disseminated worldwide thru Google's Alert service, this conspiratorial activity has both harassed and defamed counter plaintiff.

On **January 21st 2011**, after counter defendant David Aman, Tonkon Torp LLP filed complaint on behalf of counter defendant Kevin Padrick and Obsidian Finance Group LLC, and Before I Knew the Lawsuit Existed David Aman, Tonkon Torp LLP sent counter plaintiff an eMail asking what her Rates and Services were in providing Internet Marketing and PR services for "David Aman, Tonkon Torp LLP", and for "Kevin Padrick and Obsidian Finance Group LLC", which further evidences continued harassment.

On the 26th of January 2011 when counter plaintiff received information that counter defendants David Aman of Tonkon Torp had filed a lawsuit against counter plaintiff on behalf of counter defendant Kevin Padrick and Obsidian Finance LLC, whom were Suing me simultaneously for the Very thing they were attempting to contract my services. This further evidences their conspiratorial activities and continued harassment.

Counter defendant Sean Boushie on information and belief has conspired with counter defendants Stephanie DeYoung, Mark Neuman, Kevin Padrick, David Aman, Robin Clute, Bernie Cassidy, P. Stephen Lamont, Kevin Padrick, Obsidian Finance LLC, David Aman, Tonkon Torp and other Jane and John Doe's to harass, defame and make threats against the life of counter plaintiff, as well as damage the career of counter plaintiff, Crystal L. Cox.

Counter Plaintiff has reason to believe that Counter Defendant Obsidian Finance LLC, Kevin Padrick, David Aman, Tonkon Torp has conspired with counter defendant Sean Boushie to defame and harass counter plaintiff.

Counter Defendant Sean Boushie has sent a Death Threat to counter plaintiff. Counter Plaintiff Bernie Cassidy acting in his official capacity as Lincoln County Attorney has conspired to hide evidence on death threat, to defame, harass and endanger the life of counter plaintiff.

Counter Defendant Bernie Cassidy aided and abetted Counter Defendant Sean Boushie to continue on hate blogs, and hate groups, and in conspiracy against counter plaintiff.

Counter Defendant Sean Boushie has been attacking counter plaintiff online for over 16 months, and engaging with all parties in stories written online by counter plaintiff.

Counter Defendant Obsidian Finance LLC, Kevin Padrick, David Aman, upon believe and knowledge have been in direct contact with Counter Defendant Sean Boushie on ruining the career and threatening the life of counter plaintiff Crystal L. Cox.

Counter Defendent Lincoln County Montana District Attorney, Bernie Cassidy has been protecting Counter Defendant Sean Boushie in Conspiracy to silence counter plaintiffs blogs and conspiracy to kill counter plaintiff.

Counter Defendent Robin Clute, as Justice of the Peace in Hamilton Montana conspired with counter defendant Lincoln County Montana District Attorney, Bernie Cassidy and counter defendant Sean Boushie to defame, harass, and threaten counter plaintiff, through frivolous, stressful, court *precedings* in Hamilton Montana, Ravalli County Court via a Protective Order filed by counter defendant Sean Boushie ( case number unknown) in conspiracy with counter defendant Robin Clute and Counter Defendant Bernie Cassidy to silence counter plaintiff's blog's exposing Montana Corruption.

Counter Defendent Lincoln County Montana District Attorney, Bernie Cassidy refuses to release information to counter plaintiff that endangers counter plaintiffs life, defames counter plaintiff, and torturously interferes with counter plaintiffs ability to do business.

Counter plaintiff evidenciary blog on counter defendants Robin Clute, Gerald Boushie, Sean Boushie, and Bernie Cassidy's harassing action is <http://www.montanacorruption.com/>, hereby incorporated in its entirety by reference herein.

Counter Defendant Sean Boushie actively recruits people to conspire against counter plaintiff, and posts on lawsuits against counter plaintiff to harass and dafame counter plaintiff, of which most lawsuits do not exist.

Upon Information and belief that counter defendant Obsidian Finance LLC, Kevin Padrick has received emails from "Sean Boushie" I believe that counter defendant Kevin Padrick and counter defendant Sean Boushie have conspired to send me a Death Threat, from a Hitman email last winter. Montana FBI Officials are investigated said death threat.

Counter defendant Kevin Padrick, Obsidian Finance LLC, Tonkon Torp, David Aman,



Sean Boushie have tortuously interfered with my ability to run my business. The Public has a right to know what I post, the information I write on affects the public.

Oregon's Anti-SLAPP (Strategic Lawsuit Against Public Participation) Statutes Protect Bloggers who are talking about things of Public Interest. Investigative Blogger, Crystal L. Cox, Defendant writing on a High Profile Oregon Bankruptcy Case that involves Oregon Attorneys and Oregon Judges and affects Real Estate Victims and Investors in Multiple States is Certainly of "Public Interest".

Counter Plaintiff Writings on Kevin Padrick, Obsidian Finance LLP is NOT a "Private Vendetta" - Counter Plaintiff Writings on the Summit 1031 Bankruptcy have always been a "Public Interest" and NEVER a Personal Vendetta, I was never involved personally nor had a personal gain or loss. I have always written on behalf of "Public Interest".

Under Oregon Anti-Slap Laws I file a motion to dispose of the lawsuit. David Aman, Tonkon Torp Law Firm on Behalf of Obsidian Finance LLP knowingly filed a Meritless Lawsuit against me to intimidate me, harass me, defame me and attempt to financially ruin me.

Counter Defendant Bend Oregon District Attorney Patrick Flaherty has conspired with Counter Defendant to defame counter plaintiff Crystal L. Cox.

Counter Defendant Proskauer Rose Law Firm has conspired to intimidate, threaten, take intellectual property and other efforts to STOP counter plaintiff from reporting on the corruption in the US bankruptcy courts.

Federal Anti-Slapp Statutes also affect this case. David Aman, Tonkon Torp Law Firm on Behalf of Obsidian Finance LLP is a high profile intellectual property attorney in Oregon and after 2 years of knowing I was writing on David Aman, Tonkon Torp Law Firm and on Kevin Padrick Obsidian Finance LLP, there was not one question asked of Me - I was not Deposed, instead the Oregon CPA involved in the Summit 1031 Bankruptcy was Deposed in videos and questioned on regard to my intentions. She was questions by David Aman of Tonkon Torp Law Firm on Behalf of Kevin Padrick, Obsidian Finance LLP. And not one question was asked of me as to my intention.

Counter plaintiff Wrote on Blogs counter defendant Oregon CPA Stephanie DeYoung was involved in the Summit 1031 Bankruptcy had a 100 Million Dollar Secret. Counter Defendant David Aman, Tonkon Torp Law Firm and Kevin Padrick Obsidian Finance LLP took this as fact from the counter plaintiff's blog and filed legal action against

counter defendant Oregon CPA Stephanie DeYoung. Counter Defendant David Aman, Kevin Padrick, Obsidian Finance, Ewant Rose never asked counter plaintiff her intentions, or for any information as to her source of information, or for any fact, in that 2 year period.

Stephen Lamont of New York, iViewit based in Armont New York was connected by Sean Boushie of Montana to join a victims hate group against counter plaintiff. Kevin Padrick Obsidian Finance was also contacted by Sean Boushie of Montana to Conspire against Blogger Crystal L. Cox.

Stephen Lamont defamed me in sending emails to all iViewit shareholders to join a hate group against me. This group was and is ran by Sean Boushie of Montana, who claims to this day to be working with David Aman of Tonkon Torp and Kevin Padrick of Obsidian Finance to harm my and financially ruin me.

Counter Plaintiff blog regarding P. Stephen Lamont, <http://www.stephenlamont.com/> , hereby encorporated by reference herein and iViewit Blog <http://www.deniedpatent.com/> hereby encorporated by reference herein, and based on information withing iViewit web site <http://www.iViewit.tv> , hereby encorporated by reference herein.

Counter Defendant Stephanie DeYoung provided information to counter plaintiff, Investigative Blogger Crystal L. Cox as to fraud against the government, tax fraud and possible solar tax credit fraud.

### Evidenciary Links

Other Blogs and Media on Summit that are not the Property of Blogger Crystal L Cox

<http://juniper-ridge-info.blogspot.com/2008/12/flash-summit-1031-bankruptcy-petition.html>

<http://juniper-ridge-info.blogspot.com/>

[http://blog.oregonlive.com/frontporch/2008/12/summit\\_1031\\_exchange.html](http://blog.oregonlive.com/frontporch/2008/12/summit_1031_exchange.html)

<http://www.summit1031bankruptcy.com/p/us-bankruptcy-court-1031-tax-group-case.html>

[http://realtentimes.com/rtpages/20090122\\_summit.htm](http://realtentimes.com/rtpages/20090122_summit.htm)

<http://www.1031exchangetip.com/summit-1031-exchange.htm>

[http://www.bendbulletin.com/apps/pbcs.dll/article?AID=/20081223/BIZ0102/812230357/1041&nav\\_category=](http://www.bendbulletin.com/apps/pbcs.dll/article?AID=/20081223/BIZ0102/812230357/1041&nav_category=)

<http://www.matr.net/article-32490.html>

<http://www.klondikemortgagenw.com/local-real-estate-blog/inland-capital-bend-oregon-real-estate-oregon-bankruptcy-summit-1031-bankruptcy>

<http://www.oregonlive.com/business/oregonian/index.ssf?/base/business/123009091623670.xml&coll=7>

And Other Blogs, Forums and Websites to be named at a later date.

Proof of Selective Prosecution, Harassment and Conspiracy to silence investigative blogger.

### Videos Links

<http://www.youtube.com/user/KevinPadrick>  
Meeting where Some Information Came From

Part One of Deposition of Stephanie DeYoung Regarding Blogger Crystal L. Cox  
[http://www.youtube.com/watch?v=\\_Jm4RuZ77bU&feature=channel\\_video\\_title](http://www.youtube.com/watch?v=_Jm4RuZ77bU&feature=channel_video_title)  
Questions on Crystal Cox, Blogger Start At 1 minute 15 seconds

Part Two of Deposition of Stephanie DeYoung Regarding Blogger Crystal L. Cox

[http://www.youtube.com/watch?v=6M9BC67e0us&feature=channel\\_video\\_title](http://www.youtube.com/watch?v=6M9BC67e0us&feature=channel_video_title)  
Crystal Cox Blogger

Videos of Summit 1031 Bankruptcy Insider Stephanie Deyoung, Oregon CPA Stephanie DeYoung on facts of Summit Bankruptcy.

<http://www.youtube.com/user/Summit1031bk#g/u>

#### Associated Case Links

Higher Balance LLC v. Quantum Future Group, Inc., No. 08-233-HA (D.Ore. 12/18/2008)

[http://quantumfuturegroup.org/HBI\\_Case\\_Documents/Sott\\_opinion\\_revised.pdf](http://quantumfuturegroup.org/HBI_Case_Documents/Sott_opinion_revised.pdf)

Information on the TaubmanSucks.com Intellectual Property Lawsuit.

<http://www.taubmansucks-thebook.com/>

<http://www.taubmansucks.com/Act117.pdf>

TaubmanSucks.com court case transcript

Michael Morgan Vs. Goldman Sachs and Company. Florida Court - Southern District of Florida - Civil Action No. 09-14110-KMM -

<http://amlawdaily.typepad.com/files/goldmansachs666-complaint.pdf>

<http://amlawdaily.typepad.com/files/stipulation-and-dismissal.pdf>

**Count I**

**Conspiracy**

**Counter Plaintiff Reallege all of the preceding paragraphs**

**Counter Defendants have engaged in conduct constituting a felony that has as an element of threatened use of physical force against property or against the person of another in violation of the laws of the United States and State Law, and under circumstances strongly corroborative of that intent, solicited, commanded, induced, and endeavored to persuade other persons to engage in such conduct.**

**20. Counter Plaintiff has suffered damages due to Counter Defendant Conspiracy.**

**21. Counter Plaintiff has suffered damages as a direct result of Counter Defendant conspiratorial actions in the approximate amount of \$150,000,000.**

**Actions of Counter Defendants, acting individually and acting together in conspiracy have deprived the counter plaintiff off legal rights.**

**Count II**

**Harassment**

**Counter Plaintiff Reallege all of the preceding paragraphs**

**Counter Defendants filed a frivolous lawsuit and continue a pattern of Selective Prosecution.**

**Counter Defendants has discriminated against Counter Plaintiff in the media exposure of the Summit 1031 Bankruptcy.**

**Counter Plaintiff has suffered damages due to Counter Defendant Conspiracy.**

**22. Counter Plaintiff has suffered damages as a direct result of Counter Defendant conspiratorial actions in the approximate amount of \$150,000,000.**

**Actions of Counter Defendants, acting individually and acting together in harassment have deprived the counter plaintiff off legal rights.**



Count III

Defamation

Counter Plaintiff Reallege all of the preceding paragraphs

Counter Defendants has discriminated against Counter Plaintiff in the media exposure of the Summit 1031 Bankruptcy.

23. Plaintiff has harmed my Oregon Real Estate Brokerage License by filing a frivolous lawsuit and defaming me among potential real estate clients as I am a licensed real estate broker in the state of Oregon.

Counter Plaintiff has suffered damages due to Counter Defendant Conspiracy.

24. Counter Plaintiff has suffered damages as a direct result of Counter Defendant conspiratorial actions in the approximate amount of \$150,000,000.

Counter Plaintiff asserts claims for libel, false light, intentional interference with business relationships, and intentional interference with prospective economic advantage against Counter Defendant.

Actions of Counter Defendants, acting individually and acting together in defamation have deprived the counter plaintiff off legal rights.

Claim for Relief

Counter Plaintiff Reallege all of the preceding paragraphs

Counter Plaintiff requests Magistry of Courts investigate all claims in regard to fraud on the courts and fraud against the government regarding the Summit 1031, Summit Accomodators Bankruptcy in U.S. Bankruptcy Court, Oregon.

25. Counter Plaintiff has suffered damages due to Plaintiff's Defamatory Lawsuit.

Counter Plaintiff has suffered damages due to Counter Defendant Conspiracy.

26. Counter Plaintiff has suffered damages as a direct result of Counter Defendant conspiratorial actions in the approximate amount of \$150,000,000.


Wherefore, Counter Plaintiff prays for judgement against plaintiff as follows:

- A. Finding in favor of defendant's claim.
- B. Awarding Counter Plaintiff damages against plaintiff.
- C. Awarding Counter Plaintiff Costs and disbursements incurred in this action.
- D. Granting such other and further relief as the court finds just or equitable.

Dated this 2nd Day of May 2011

Crystal Cox, Pro Se

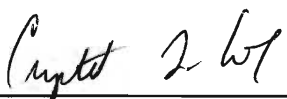
Counter Plaintiff

  
\_\_\_\_\_

Crystal L. Cox  
PO Box 1610  
Eureka Montana

Crystal@CrystalCox.com

Crystal L. Cox  
Investigative Blogger

  
\_\_\_\_\_