

June 21, 2013

Steven W. Seymour
SWS@SamuelsLaw.com

BY EMAIL: erik.hasselmann@co.land.or.us
AND FIRST CLASS MAIL

RECEIVED

JUN 24 2013

Lane Co. District Attorney

Mr. Erik Hasselman
Assistant District Attorney
Criminal Division
Lane County District Attorney
125 East 8th Avenue
Eugene, OR 97401

Re: Andrew Glen Clark – Stalking Order Complaint

Dear Erik:

Thank you for taking the time to meet with me last week and for your understanding and support.

Enclosed please find a form of Stalking Complaint as provided in ORS 163.744. From our previous conversation, I understand that you will rework these allegations into the proper format. I am sending the exhibits with the copy of this correspondence sent by regular mail to you and Detective Veach. Once reformatted, it can be provided to Christopher Mixon, General Counsel for Ogletree Deakins, for signature. I can facilitate that process.

Please contact me if you have any questions regarding this Stalking Complaint, or if I can provide any additional information to you.

Very truly yours,



Steven W. Seymour

SWS:smy

Enclosures

07180-00001:336449

cc: Mr. Anthony D. Veach, Detective, Violent Crimes Unit (w/encls.)
Mr. Christopher Mixon (by email, w/complaint, w/o exhibits)
Ms. Leah Lively (by email, w/complaint, w/o exhibits)
Dr. Dennis Davis (by email, w/complaint, w/o exhibits)

(23) Fax dated 5/23/2013 1:22 p.m. which reads in part:

“Ogletree Deakins attorney Leah Lively . . . caused a police and SLAPP action against me. . . . I have no option and in fact have the obligation to return in spades what Oppressors deal out . . . until a victim’s last breath. As I have written and said hundreds of times during the corporation/community anti-Sementic profiling and cleansing . . . Never Again. This Jew will not go quietly. I will scream loudly, clearly, daily . . . and I will make sure to bring as many of my oppressors with me to the same legal graveyard of ghettoization and defaming . . . endless lawsuits against you and your companies and massive negative publicity. Endless ‘smearing.’ . . . The innocent-but-rich executives will be “perp-walked and then sent to prison.”

8. Subscribed to and affirmed by: _____

Ogletree Deakins Nash Smoak & Stewart, PC

Date: _____

By: _____

Christopher A. Mixon, Shareholder and
General Counsel

07180-00001:336432

The simplest solution is usually correct. If you did that, it is my opinion that Specific act of Genocide for economic/political reasons tied into the Kidnapping, Concealment, and the arguably-treasonous violation of Dodd Frank/SOX in context with my Wells Fargo India Solutions reporting is what propels this matter into something so criminal, so novel, that it will require application of the Death Penalty on a Liberal Basis.”

- (20) Fax dated 5/8/2013 7:27 a.m. which reads in part:

“Art Film depicts District Court. The Judge oozes Blood from its freshly bitten arm into the Female Attorney’s Mouth. Another Female Attorney is smearing Blood over herself in open COURT wearing a swimsuit. . .

Ms. Leah Lively Attorney Ogletree Deakins . . .

I think Attorney REALLY screwed up. Let’s compound it with an Act of Genocide to Retaliate. . . Leah Lively: Literally this-if you personally coordinated this by calling up security at Wells Fargo Bank in Portland to mess with mortgage biz in Eugene and then take my family away, you will be Dealt the Death Penalty if possible under the Law for your disgusting, treasonous, sickening coordinated act of Holocaust. Disbarment is going to happen. You appear to be the worst type of Bank Robber, Kidnapper, and Manipulator. You are a blight upon the entire human race the likes never before seen if you actually did what it seems that you did.”

- (21) Fax dated 5/9/2013 5:33 p.m. which reads in part:

“URGENT UPDATE LEAH LIVELY/OGLETREE DEAKINS

“ . . . my recent Vampire Video which was a Grave Yard Hit . . . over 12,000 views in just a couple days. It is on sites or on youtube channel RisePatriot. It can be “our song”. <3 4 u”

- (22) Email dated May 17, 2013 7:32 p.m. Subject: Andrew Clark dead at Albertson’s Supermarket.
<http://www.youtube.com/watch?v=Vb--OfEYwQ>:) This video is referenced in Exhibits 17, 18, 19, 20 and 21 and shows the scenes referenced in those Exhibits. Screen shots of those scenes are attached to Exhibit 22.

(16) Fax dated 4/28/2013 4:17 p.m. which reads in part:

“Ogletree Deakins attorney are mean Faggots. . . They use time-tested “Child Rape Concealment Tactics” . . . Once you see it for what it is, you will want them put to death. It is that bad: what they do and coordinated for the “Bank” should subject them to the Death Penalty. It is such a novel, horrific crime that is appropriate. . . That allows speedy execution of the Perpetrators of Holocaust (Leah Lively and her cohorts). It allows them to be Hanged by the Neck Until Dead as we laugh but I think an Electric Chair would make better Youtube Art.” (Note Exhibits 17, 18, 19, 20 and 22 references to a Youtube video which includes an image of an actor suffering death on an electric chair)

(17) Fax dated 5/6/2013 10:24 p.m. which reads in part:

“All attorney involved in this matter acted illegally and due to my Agency filing there is absolutely no exit and no escape for what Ogletree/Wells Fargo perpetrated unless we Work Together for Progress.”

(18) Fax dated 5/7/2013 8:33 a.m. which reads in part:

“NEW MUSIC ART Tool: “Liars, Lawyers what’s the Difference” with Extremely BLOODY VAMPIRE Attorney Footage @ about 2 minutes until the end. Art Film depicts District Court, The Judge oozes Blood from its freshly bitten arm into the Female Attorney’s Mouth. Another Female Attorney is smearing Blood all over herself in open COURT wearing almost nothing. . .

Dear Ms. Lively: . . .

Nobody wants to think of a really good looking woman as a Felon subject to Life in Prison or the Death Penalty but that is your new reality.” (See Exhibit 22 which links to the referenced video.)

(19) Fax dated 5/7/2013 9:38 a.m. which reads in part:

“Art Film depicts District Court. The Judge oozes Blood from its freshly bitten arm into the Female Attorney’s Mouth. Another Female Attorney is smearing Blood all over herself in open COURT wearing almost nothing. . .

Dear Ms. Lively: . . .

- (11) Fax dated 4/21/2013 12:15 a.m. which reads in part:

“Ogletree Deakins Attorney are cheating fee-gouging Pus-Filled Anal Worms of Holocaust. They are expensive, know-nothing Gaping Legal Rectums Grunting Out Fecal Filings in Courts. Their boilerplate piles of random idiocy may impress others as stupid as them but it is treasonous Ebola-infected tripe from the Rotted Ogle Tree of Homicide. They are the Death of Intellect, the Death of the Worker. They are the Death of their Clients and all of America. Ogletree rapacious tyranny by fear and degradation of the American Worker must End.”

- (12) Fax dated 4/24/2013 7:53 a.m. which reads in part:

“Leah and Ogletree: There is a lot more to this meets the eye. This was among correspondence sent to Ms. Lively. I will let her show you the hilarious ones where I suggested we drop the case and have loving sexual relations instead.”

- (13) Fax dated 4/24/13 8:15 a.m. which reads in part:

“Leah and Ogletree: There is a lot more to this meets the eye. This was among correspondence sent to Ms. Lively. I will let her show you the hilarious ones where I suggested we drop the case and have loving sexual relations instead. They were socially appropriate but direct. . . She and all others are “hung” by the “Cherry Picker Fallacy.”

- (14) Fax dated 4/27/2013 10:00 a.m. which reads in part:

“Leah Lively, Ogletree Deakins Attorney are going to be Toasted. At a minimum they will be disbarred and shamed until they turn to dirt. More likely: life in prison or the death penalty. You think I am kidding? I am not. I have not heard from them on Settling this . . . not from Wells Fargo et al either. I will wait a short time then you will Be Punished Severely.”

- (15) Fax dated 4/27/2013 10:59 a.m. which reads in part:

“Ogletree Deakins and most attorney are fee-pretexting, fee-gouging Highwaymen of the lowest order. . . Let us make an example of them using Tar and Feathers first followed by hanging or firing squad . . . or at least disbarment and imprisonment.”

- (7) Fax dated April 05, 2013 1:22 a.m. which reads in part:

"4.4.13, Hate-O-Gram . . . Charges Against Portland Attorneys Leah Lively, David Symes and Wells Fargo Security Agent Martin Ognio. It is possible Leah Lively's husband was involved. . .

They are the worst of the many anal worms who attacked me. They go first. It will taken (sic) down to the level of the process server. The Bar Association is going to be decertified. The local judges will be shipped out on rail after tar and feathering. One of the sickest most disgusting blots on the planet is the used-tampon of a beast named Leah Lively who is a filthy stinking corporate whore with intellectual Ebola. She thinks she is pretty. She is Ghastly Ugly. Her ugliness inside is so horrific it ruins an otherwise decent looking woman. . . Bust them, impoverish them, put them on the streets . . . I will start all-out-legal-war shortly due to necessity."

- (8) Fax dated 4/13/2013 6:57 a.m. which reads in part:

"4.12.2013 Christopher Mixon Ogletree Deakins et al . . . I must now ramp up neutralization of legal opposition forces. There is no doubt in my mind all Attorney at Ogletree Deakins with CLIENTS will be finding another place to work within 30 days leaving the rest stuck with all the bills and no income and you and your families will possibly die on the streets. . . That is what shall be delivered to you and all who did Wrong to Me. What you dished out will be served Cold and in Spades and Beyond Comprehension."

- (9) Fax dated 4/18/2013 8:51 a.m. which reads in part:

"Ogletree Attorney are Know-Nothing Perverted Anal Worms Who Rape, Kill, and Eat our Children . . . **Workers: Lock & Load NOW** – Annihilate Stupid Overpaid Management."

- (10) Fax dated 4/20/2013 10:10 a.m. which reads in part:

"BLAME: Ogletree Deakins Employment Law . . . They are a mindless, expensive, know-nothing Boilerplate Legal Filing Dumping Machine. Their piles of legal crap may impress the uneducated but it is treasonous tripe from the Rotted Fetid Ogle Tree. They are the Death of Intellect, the Death of the Worker. They are the Death of their Clients and all of America. Their rapacious tyranny must End. Drown them in Feces. Thank you very much."

- (1) Undated fax which reads in part:

"ATTORNEY OGLETREE DEAKINS: CHILD RAPISTS.
CHILD KILLERS. Your Child is NEXT."

- (2) Email dated March 8, 2012 10:56 a.m. which reads in part:

"I hope what you did to me happens to you or your kids. I really do so you can FEEL it. . . You will suffer as you made me. You are all sick animals and you must all be dealt what you dealt to me."

- (3) Email dated June 20, 2012 1:06 a.m. which reads in part:

"You are abject criminals of the very most obvious sort. I am not talking about "torts" . . . you are Criminals. Your action is SLAPP and it is tandem to RICO. And then YOUR FIRM tries to BURN ME MORE? Bring it ON, Ms. Lively. . . Bring it On if that is what YOU want."

- (4) Email dated August 2, 2012 6:30 p.m. which reads in part:

"You freaks are going down. There will be nothing left. You will be living in tents eating bugs for what you did. Ms. Lively: get ready for buying clothing at Salvation Army Counters after the 5 year stretch."

- (5) Email dated August 8, 2012 10:39 p.m. which reads in part:

"Bunch of sick fuks (sic), you will get your payback each day as you have to live with yourself. Not much longer kiddos, not much longer. Infowars are ON pigs! Thank you for stealing and crushing. You all suck except people who want to look at this horror and actually help. thanks u."

- (6) Fax dated 9/26/2012 12:21 p.m. which reads in part:

"Never again will a Jewish Person or Any Person be the Victim of a Crime Against Humanity without Apocalyptic Response. Now I am impoverished by Wells Fargo, they refuse to politely Settle the Matter and acted to destroy me utterly."

STALKING COMPLAINT

1. **Name of petitioner (person presenting complaint):** Ogletree Deakins Nash Smoak & Stewart, PC, a South Carolina professional corporation, by and through Christopher A. Mixon, shareholder and general counsel, 401 Commerce Street, Suite 1200, Nashville, TN 37219-2246.
2. **Name of person being stalked if other than the petitioner:** N/A
3. **Name of respondent (alleged stalker):** Andrew Glenn Clark
4. **Description of respondent:** white male, dob 08/08/1958
5. **Length of period of conduct:** May 2011 to present
6. **Description of relationship (if any) between petitioner or person being stalked, if other than the petitioner, and respondent:** From May 2011 until November 2012, respondent was the adverse party to petitioner's client, Wells Fargo Bank, N.A. in the following two proceedings:
 - a. **Andrew Clark v. Wells Fargo Home Mortgage**, US Dept of Labor, Case No.: 2012-SOX-00003 filed June 19, 2011, filed under Section 806 of the Corporate and Criminal Fraud Accountability Act of 2002, Title VII of the Sarbanes-Oxley Act of 2002, 18 USC § 1514A. and the implementing regulations at 29 CFR § 1980.
 - b. **Wells Fargo Bank, N.A. v. Andrew G. Clark**, US District Court Case No. 6:11-CV-06248-AA, Complaint for Injunctive Relief.
7. **Description of contact:** During the litigation referenced in Section 6, above, Clark, appearing pro se, engaged in the pattern of offensive, obscene, sometimes lurid, and often hostile communications with the petitioner and its client, Wells Fargo. Some of these communications were styled as "pleadings" and many of them were direct communications to Ogletree attorneys and staff.

The conclusion of the above-referenced proceedings did not, however, abate Clark's deluge of offensive and threatening communications to Ogletree and its attorneys. Clark's communications have continued on an almost daily basis through the present. And, the tone and content appear to be growing more aggressive.

Over the course of this relationship, Clark has sent not less than 2,500 communications to the petitioner. Those communications which constitute threats and instill in the respondent, and its attorneys and staff, a fear of imminent and serious personal violence from the respondent, are attached as Exhibits 1-23 and are summarized as follows: