

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA**

Robert Preiss

Case No: 8:13cv-00297-MSS-AEP

Judge: Honorable Mary S. Scriven

Plaintiff

Vs

Masterpiece Publishing Inc, Daniel Wynn,
Triad Art Group Publishing Inc, Greg Bloch
Stanley Warren
Global Village Champions Foundation Inc,
Yank Barry, Yvette Barry,
Intuortho Medical LLC. , Ziegenfuss LLC.
Zarasota Medical Products LLC, Robert Ziegenfuss
Lourdes Ziegenfuss
Robin Rile Fine Art, Reed Horth
Richard Clarvit, 88's Entertainment LLC,
James Layson

Defendants

**FIRST AMENDED CLASS ACTION COMPLAINT
AND JURY TRIAL DEMANDED**

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I. INTRODUCTION

1. This is a proposed Class action to redress one of the largest Art and tax frauds in recent history. This action is brought by Plaintiff , pursuant to Rule 23 of the Federal Rules, of Civil procedure, against the Defendants : Masterpiece Publishing Inc. , Daniel Wynn, Triad Art Group Publishing Inc., Greg Bloch, Stanley Warren , Global Village Champions Foundation Inc., Yank & Yvette Barry, Intuortho Medical LLC., Ziegenfuss LLC., Zarasota Medical Products LLC., Robert Ziegenfuss, Lourdes Ziegenfuss, Robin Rile Fine Art Inc., Reed V. Horth, Richard Clarvit, 88's Entertainment LLC, James Jim Layson, for violations of the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. §§ 1961 et seq. ("RICO") and the Florida Unfair and Deceptive Practices Act, Florida Statutes §§ 501.201 et seq. and Florida common law in connection with a complex and wide ranging scheme used by the Defendants to defraud Plaintiff of his income, properties, liberty's and identity, through Extortion, Conspiracy, Fraud , and various violations of Federal and State law.

2. At issue in this case is the Defendants scheme, to eliminate any sort of business Income, to consume all assets realized in a 20 year time frame , to secure valuable art only found at museums without payment, to convert the inventory, client data, prestige, Suppliers, clients, from Plaintiff into the Defendants control. Fraudulently the Defendants gained access through misrepresentations, fraud, theft, manipulation, Deceptions, Espionage to the assets and Trust of Plaintiff, and as described below,

willfully enriched themselves in enormous proportions. These gains Defendants divided among each other, enjoyed together, failed to identify to the IRS. Even non profit Foundations, have been solely maintained as just a Façade for Lucri Causa and the solicitation and distribution of forged, counterfeit art.

3. Plaintiff purchased world wide art, and distributed such art through the retail facilities that he lead as agent over 15 years. The investments exceeding 10 million US dollar realized by Plaintiff have been subject to the wide ranging scheme to extort, steal, and defraud Plaintiff of his life work, and to use “ international Defamation” for conversion of Properties and identity, founded on unconscionable conduct.

4. The Defendants victimized and mislead Plaintiff and the Class of the value of any and all property consumed through a scheme implemented by the Defendants that lead to the consumption of art, clients, suppliers, freedom, reputation, income, family , to finance the lavish lifestyle the Defendants engaged in . The scheme increased in dynamic through the continued pattern of Fraud, the Defendants applied related to offerings and sales to international clients of Plaintiff, related to assets belonging to Plaintiff, offered via intellectual property also belonging to Plaintiff. Funding for such violations and extensive enrichment , was provided through the assets consumed from Plaintiff, without Satisfying their value, and related sales tax. The Defendant Richard Clarvit in May of 2009 wrote:

.....Bob and Lourdes while having access to the Gallery conspired with Reed to Steal R&R Bond Galleries proprietary information, including but not

limited to Client, supplier and consignor list.Reed was the only individual other than Preiss who had a key for the locked filing cabinet.Defendants have used R&R Bond Galleries proprietary information to attempt to steal business from R&R Bond Galleries and to interfere with R&R Bond Galleries contractual and business relationships, among other crimes of frauds perpetrated against R&R Bond Galleries, through the use of Reeds recently opened gallery, Robin Rile Fine art.

5. The Defendants developed this reprehensible scheme and moved the assets Consumed, in numerous corporations, foundations, or generated Cash that never surfaced in any tax return. In fact at the time asset transfer from Plaintiff, to the Defendants was realized, the Defendants initiated numerous Rico enterprises , that have been opened, closed, dissolved, as the situation requires, . (Intuortho Medical LLC, filed with the Secretary of the State of Florida on "April 8th. 2009" , Ziegenfuss LLC. Filed On "April 14th 2009")

In May of 2009 the Defendant Clarvit stated :

Bob and Lourdes did not account to R&R Bond Galleries for such cash Transactions and have not accounted to date for the illicit cash transactions entered into or through the gallery.

6. Assets consumed from Plaintiff, including his achievements and identity, surfaced on the Robin Rile Website, International art brokerage sites, and exhibits.

7. From 2007 on up to this date, assets belonging to the Plaintiff, have been by the Defendants identified as their own. The scheme started at the Plaintiffs retail facility in Sarasota Florida generating as identified to the IRS 3,3 Million Us dollar within few months of its opening, promising yearly sales between 8 to 10 Million US dollar. The

Defendants witnessed the performance, enjoyed the 10 million dollar of Inventory, and public ally announced to be its sole owner. Plaintiff was identified as the Defendants "employee in his own business". (emphasis added)

8. As early as 2006, prior of Plaintiff knowing of the existence of Robert Ziegenfuss, Reed Horth maintained as identified with his own words relations with Mr. & Mrs. Ziegenfuss see [Http://pintrest.com/pin/16607092345626821/](http://pintrest.com/pin/16607092345626821/) In such advertisement the Defendant stated: **RECENT ART PLACEMENTS**

**ARMAN L' Ame de Venus" pure silver and black DAUM glass. Edition of 12
Worldwide placement 2006**

The Photo displays the artwork in the home of the Defendants Robert & Lourdes Ziegenfuss, which serves additionally as location of operations for all their corporations. The Artwork featured reflects property, the Plaintiff secured and purchased in Paris, and that was subject to Grand theft in 2009. The Defendant Richard Clarvit in May of 2009 wrote:

**Reed has offered for sale items that Bob and Lourdes stole or arranged to have
Stolenon Reeds Gallery website.**

9. Art gained through Fraud, extortion and Theft, the Defendants inflated and offered, to clients of Plaintiff, without identification of its true owner, and by doing so eliminating Infinitely all income for the Plaintiff, leaving him only with the expenses of his established business. The provenance for such illegal offerings, lacked the Plaintiffs existence. Inducement to Fraud, based on Art gained by Fraud summarizes these

numerous occurrences'. These assets consumed and their true value, additionally never have been subject to tax identification, and therefore realized an additional financial advantage for the Defendants.

10. Defendant Global Village Champions Foundation Inc., a non profit and charitable foundation, is in actuality an instrumentality of Fraud, used to market and sell under the slogan "Feeding the Hungry", Edgar Degas replicas as originals. As art expert, art researcher and author of books Gary Arsenau stated :

All so-called bronzes (much less in brass) attributed to Edgar Degas, are non Disclosed posthumous (after death) forgeries with Counterfeit Degas Signatures inscribed. Edgar Degas died in 1917. The dead don't sculpt, much less sign. This link documents the contentious issues of Authenticity surrounding non Disclosed posthumous forgeries being falsely attributed to Edgar Degas.

Gary Arsenau additionally extended his testimony and identified the Yank Barry offerings as "DEGAS BRONZE FORGERIES,,these copies represent the largest Art fraud of the 20th and 21st century". He added with emphasis for all these casts to be "worthless", and subject to wire fraud and mail fraud. The scheme to use such objects, for the sole purpose of personal enrichment, by converting these fakes to objects of greater value , or to divert wealth into the personal Bank accounts of Yank and Yvette Barry, to which Plaintiff paid amounts exceeding 60,000 US dollar via Sun Trust bank cashiers checks. The Global Village Champions foundation as alleged used Racketeer funds to promote the extensive scheme.

11. Under the application of Fraud, intentional Misrepresentations, manipulation of facts, purposefully manipulated appraisals, the lavish lifestyle of the individuals is the true objective, by using the " faces of hungry children and adults " to increase wealth. This leaves the Plaintiff with a summery of injuries, due to the reckless scheme conducted by the Defendants.

12. The Defendants Masterpiece publishing Inc. , Daniel Wynn, Triad, Greg Bloch, participated in the scheme, to cause injury beyond repair, that would as intended convert all properties owned by the Plaintiff, under the control of the Defendants from which each individually greatly benefited. False affidavit's, "perjury" (18 U.S.C. § 1621) have been the foundation to Eliminate not only the Plaintiffs' image, income, clients, suppliers, but additionally the "Defendants extensive Debt " related to injuries and damages the Plaintiff encountered , and that until today remain unpaid. The scheme also included the elimination of any and all evidence, hard copies , invoices and computers from Plaintiff, related to such liabilities, and the illegal conduct the Defendants combined applied, to gain from the continued losses of Plaintiff through conspiracy, extortion and fraud. In May of 2009 the Defendant Clarvit on behalf of Plaintiff demanded :

Plaintiff is entitled to have the agreement rescinded and to recover damages in Excess of \$ 650,000,00 for the loss of business due to the Bob and Lourdes Actions and the loss of the business' goodwill, together with interest.....

13. The scheme realized kickbacks, payoffs, which lead to the loss of numerous properties, exceeding the injury value, way above the material aspect. Defendant Richard

Clarvit knowing of the scheme, and the enormous injuries, inflicted additional damages by violating all principals and ethics of his by oath committed duty, and gained in the Scheme a nightclub identified as "Pineapple Groove" in Delray Beach, which served as a cover for his very own personal enrichment. James Jim Layson involved in "Strip clubs " with the "MOB" and witness to the affairs and instruments used by organized crime organizations since 1997 , and therefore familiar with RICO in his own personal past, realized with the Defendants a payoff for injuries Richard Clarvit inflicted, that lead to the transfer of the Plaintiffs assets, identity, money and life's work.

II. JURISDICTION AND VENUE

14. This Court has federal question jurisdiction over the subject matter of this action Pursuant to 18 U.S.C. §§ 1951,1961, 1962 and 1964; 28 U.S.C. §1331,1332, 1367, and 1391.

15. Diversity jurisdiction is also confirmed over this class action pursuant to the Class action Fairness act of 2005, 28 U.S.C. § 1332 (d), providing for jurisdiction where, as here the aggregated amount in controversy exceeds five million dollars (\$ 5,000,000), exclusive of interest, and costs.

16. This court has personal jurisdiction over the subject matter of this action pursuant to 18U.S.C. § 1951(a) ,(b), related to Hobbs act violations the Defendants committed.

17. This court has personal jurisdiction over the Defendants pursuant to 18 U.S.C. §§ 1965 (b) and (d).

18. This court has official jurisdiction over the Defendants pursuant to 18 U.S.C. § 1956 (a), (b) .

19. The activities of the Defendants and their co-conspirators as described herein have been within the flow of interstate commerce on a continuous and uninterrupted basis and have had a substantial, devastating effect on interstate commerce.

20. Venue is proper in this district pursuant to 28 U.S.C. § 1391 (b) because a substantial part of the events or omissions giving rise to the Plaintiff's claims occurred in this district and/or a substantial part of property that is subject of this action is situated in this district.

III. PARTIES

A. PLAINTIFF

21. Plaintiff Robert Preiss is a Austrian Citizen residing in Tampa, Florida. Robert Preiss is a victim of the illegal acts alleged herein and was injured as a result, suffering substantial losses to his money, property, world wide reputation, and freedom.

www.youtube.com/user/SalvadorDaliGallery/feature=watch

B. DEFENDANTS

22. Defendant Masterpiece Publishing Inc., is a Irvine California corporation, with its principal place of business located in Laguna Beach, California. During some or all of the

relevant time (2006-2013) herein Masterpiece Publishing Inc. through its Agents, was associated with the Defendants , and assisted them in connection with the scheme to defraud.

23. Defendant Daniel Wynn is a citizen of the State of California. In his function as President of Masterpiece publishing , the Defendant was during some or all relevant time associated with the Defendants and assisted the Defendants in connection of the scheme to defraud.

24. Defendant Triad Art Group Inc., is a Chicago, Illinois corporation, with its principal place of business located in Romeoville, Illinois. From 2008 through 2013, the Defendant Triad Art Group Inc. through its agents was during or all relevant time associated with the Defendants , and assisted the Defendants in connection to the scheme to defraud.

25. Defendant Greg Bloch President and owner of Triad Art Group Inc. , with its principal place of operations located in Romeoville, Illinois was during or all relevant time associated with the Defendants, and assisted the Defendants in connection to the scheme to defraud.

26. Stanley Warren is a citizen of the United Kingdom, from where during or all relevant time his association to the Defendants was maintained, and assistance for the Defendants in connection to the scheme to defraud was provided. See

<http://www.houzz.com/photos/1411299/Salvador-Dali-curation-and-artwork-mediterranean-artwork> hereto.

27. Global Village Champions Foundation Inc, The foundation is a Miami Florida non profit organization, with its principal place of business in Miami, Florida. During or all relevant time the foundation maintained and assisted the Defendants in the scheme to defraud, and directed, and convert Plaintiffs assets and monies into private accounts of its founders.

28. Defendant Yank Barry is the Chief Executive Officer and founder of the Global Village Champions Foundation Inc., with his principal place of business and residence in Sarasota, Florida. This non Profit foundation Yank and Yvette Barry with intend and willfully use to withdraw personal benefits into private Bank accounts. The Global Village Champions foundation through its Agents, as alleged uses income from Racketeer activities that includes the cash sale of lotto tickets (raffling) , to maintain the lavish lifestyle of its founder and partners of the scheme.

29. Defendants Intuortho Medical LLC., Ziegenfuss LLC., Zarasota Medical products LLC., operate in residential locations, with its current principal place of business located in Osprey Florida. These Corporations through its agents have been associated, with the Defendants and assisted during some or all of the relevant time herein to advance the scheme to defraud. These and other affiliated corporations are used for the sole purpose of personal enrichment related to Robert & Lourdes Ziegenfuss, and operate as a foundation of the Racketeer RICO scheme identified in this complaint. No websites, products, services and income streams are public ally, officially identified by these corporations.

Artwork stolen from Plaintiff was placed in their corporate locations.

30. The Defendant Robin Rile Fine Art Inc., is a Miami Florida Corporation founded for the sole purpose, to convert, steal, and withdraw all economical life from Plaintiff, for profit . All art stolen from Plaintiff, all clients of Plaintiff, all suppliers from Plaintiff, all intellectual and physical properties of Plaintiff, this artificial entity consumed, as part of the Racketeer scheme, and used such gains for the purpose of personal enrichment. The benefits from this scheme, are equally divided among the Defendants.

31. The Defendant Reed Horth, aka Reed Van Horth, aka Reed Vincent Horth is a resident of Miami Florida. The Defendant knowingly, intentionally and actively sold art work belonging to the Plaintiff, by eliminating the true owner from its provenance. The Defendant with willful intend eliminated the economical life, redirected the source of income, and actively initiated and conducted the scheme to defraud , to replace R&R Bond Galleries Inc. with R&R Robin Rile Inc., for the purposes of personal enrichment.

32,. The Defendant Richard Clarvit , attorney registered with the Florida bar, maintains a principal place of business in North Miami Florida. During some or all of the relevant time herein, Clarvit was associated with the Defendants and assisted them in connection with the scheme to defraud. The unethical, illegal conduct the Defendant with his participation realized by joining the Defendants in their scheme, to defraud the Plaintiff of his income and property, along with his freedom, furthered the Defendants

joined objectives of personal enrichment, and concealment of their criminal acts .

33. The Defendant 88S Entertainment LLC., is a Florida limited liability company, maintaining a principal place of business in Boca Raton Florida. During some or all of the relevant time herein, 88s' Entertainment LLC., was through his agents associated with the Defendants and assisted them in connection with the Scheme to defraud. On November 25th. 2007 this artificial entity was initiated with the Secretary of State. The purpose of 88S Entertainment LLC is strictly related to the fraudulent scheme, that would realize the concealed pay off , for Richard Clarvit's, participation to extensively injure the Plaintiff, through a Delray Beach Nightclub venture identified as " Pineapple Groove."

34. The Defendant James Layson is a Florida resident with its place of operations in Boca Raton Florida. In 1997 James Layson initiated Ruby Inc. with Mobster Claudio Carmona, who later was convicted on RICO crimes. The strip club identified as Belly Bottoms he owned with the MOB was soon subject to criminal investigations. James Layson promoted the Plaintiffs injuries through his participation in the Scheme.

FACTUAL ALLEGATIONS

THE SCHEME

35. The Defendants used fraudulent contracts and false pretense to be in active business relations with Plaintiff, to gain excess to the retail facility, the inventory, the contracts, and business operations. The Plaintiff occupied a unique international position

in the market of Sculptures and Paintings usually only found in important Museums around the world, which realized also long term relations with Forbes 500 members, such as the Carlos Slim Helu Foundation and family in Mexico city. (over 10 years) see <http://m.youtube.com/#/watch?v=96SYhTJAu4A&feature=pipp> hereto.

These high profile International collectors and clients , over 18000 world wide, secured yearly profits and gains for the Plaintiff for almost 20 years. See hereto:

<http://www.artfinding.com/News/Salvador-Dali-Monumental-Collection-sold/3.html>

36. To sustain and prevent detection of the scheme to defraud, the Defendants used foundations and artificial entities, to hide, laundry, and consume cash and assets.

37. In furtherance of the scheme to defraud and for the sole purpose of personal enrichment the Defendants induced and consumed sales belonging to the Plaintiffs corporation, and engaged in numerous cash , transactions, that systematically reduced the income for Plaintiff.

38. In furtherance or execution of the scheme to defraud , the Defendants used Racketeer gained funds, to bribe suppliers, and officials, to increase injuries of the Plaintiff. The Defendants Robert and Lourdes Ziegenfuss gained through the scheme of fraud a total of 521,590,00 US dollar, for which personal checks have been cashed by the Defendants. See Exhibit A (1) hereto. Richard Clarvit in May of 2009 stated:

.....Plaintiff paid 600,000 in commissions in over 18 months to Bob and Lourdes who were able to gain these commissions through Fraud and deceit, Commissions which they should have never been entitled to gain in the first Place.

39. To sustain, advance and prevent detection of the scheme to defraud, the Defendants pretended to be in active, mutually beneficial business relations, using such foundation to distribute Fake art , and to use the Plaintiffs prestigious merchandise for the distribution of art with questionable origin, provenance, ownership and authenticity status.. Defendant Richard Clarvit in May of 2009 addressed this issue as follows:

Bob and Lourdes also attempted to sell false or fake pieces of art through the Gallery, including but not limited to works allegedly made by the artist Botero

40. The Defendant Reed V. Horth is a key element of the scheme who not only Represented to Plaintiff to be by education Curator, Art Expert and Art historian, his recent profile posted on the World wide Web at :

[Http://www.yatedo.com/p/Reed+V.+Horth/normal/9c2303239de548d72f39257726c](http://www.yatedo.com/p/Reed+V.+Horth/normal/9c2303239de548d72f39257726c994d0)

994d0 public ally conceals with intend the time frame in which Reed V. Horth actively drained and defrauded the Plaintiff for years. The Defendant converted up to this date within this scheme properties and intellectual properties, from the Plaintiff and used “fraudulent public announcements and representations“, to cover his criminal track .

The Defendant Clarvit wrote on April 2nd. 2009 to the Defendant Reed V. Horth:

You claim your staff has placed “nearly 100 Million in international Fine Art Purchases “ on

<http://www.soulofmiami.org/2009/03/18/robin-rile-fine-art-opens-its-Virtual-doors/>.

It appears you appropriating Roberts and the Gallery’s sales as your own, which you do not have permission to do so. This is ANOTHER fraudulent Misrepresentation using Roberts work as your own.....

41. Within the 4 years of the scheme Reed V. Horth managed to enjoy the benefits of a Porsche Cayenne turbo from Plaintiff realizing the monthly expenditure of 2500 US Dollar, solely for his personal use, to sustain his flashy misleading appearance, for which Restitution is required.

42. To sustain, advance and prevent detection of the scheme to defraud, the Defendants used the US postal service, private and interstate carriers, and interstate wires as well as cash payments along with interstate phone lines in violation of the federal mail and wire fraud statutes, 18 U.S.C. §§ 1341 and 1343 included but not limited to the following :

- a) Mailing and wiring to clients, suppliers, business partners of Plaintiff fraudulent misleading, deceptive and or false sales offerings, realizing inducement to Fraud, not disclosing the origin of art gained and subject to Grand Theft, fraudulent verification of payments, authenticity documents, and statements related to the market value and payments for art. (IRS included)
- b) Mailing and wiring to clients and suppliers of Plaintiff forged ownership certificates, fraudulent issued Provenances, transfer of title, related to art belonging to the Plaintiff, along with all intellectual properties that the Defendants used for the purpose of personal enrichment. Withholding disclosure of not only true ownership, but non payment of sales, income and other taxes related to such artwork.
- c) Transferring by wire and via Interstate shipping, and or mail Property exceeding the value of 400,000,00 US dollar belonging to Plaintiff, to new parties. To sustain and prevent detection of the scheme to defraud, the Defendants induced unrelated buyers into illegal ownership, by not disclosing its rightful owner. Art exceeding 5,000,000,00 US dollar is subject to Racketeer RICO acts, that realized extensive personal gains, for the Defendants. The Defendants solicited Plaintiffs international customers by telephone, direct mailings, emails, art brokerage sites, and the media with intellectual property and art belonging to Plaintiff.

43. To sustain and prevent detection of the scheme to defraud the Defendants are in direct violation of the TRADE SECRETS Clarification act (TSCA and FEEPEA) by stealing personal computers, mail, documents, invoices, bookkeeping records, and as identified by OWL digital security in an official ESPIONAGE report, confirmed hacking into Plaintiffs corporate and personal business accounts, to gain advantage, resume identity, control the flow of information and income, to “criminally takeover” the operations of Plaintiff.

44. Using the trust and retail facility of the Plaintiff, Reed V. Horth covered his illegal conduct with pretense and fraudulent intend , and acted pretended to be in mutually beneficial relations with Plaintiff. The scheme of asset conversion remained for a long time under concealment. Numerous properties disappeared between 2006-2012. The Defendant Clarvit stated in May of 2009 to this subject :

Reed has offered for sale items that Bob and Lourdes stole or arranged to be stolenand while there Reed participated in the exploitation of the existing good will and reputation of R&R Bond Galleries for their personal gain and attempting to “FORCE R&R Bond Galleries into bankruptcy”.

(emphasis added) The scheme additionally required to drain the cash resources of Plaintiff, which in the case of the Defendant Reed Horth, summarizes a total of 328,820 US Dollar in damages, that the defendant cashed in personal checks, for the purpose of personal enrichment. See Exhibit A (2) hereto. Lies up to this date reflect a pattern, in which the Defendant actively engages, to mislead, induce, and defraud the public an the Plaintiff.

Restitution for the amounts consumed on a foundation of deceit and fraud is required.

45. The Defendants Racketeer scheme to defraud and extort was based on 3 stages:

STAGE 1 : eliminating sales, to redirect clients to their own personal corporate network

STAGE 2 : to steal Museum quality art, clients, suppliers and any other corporate assets,
intellectual Included and to finance a new Art Company through such gains.

In May of 2009 the Defendant Clarvit wrote:

**...Defendants took steps in furtherance of their agreement including
but not limited to stealing client, supplier and consignor lists,**

The Defendant Clarvit in his April 2nd. Of 2009 document to the Defendant Reed Horth
Stated:

**You have allegedly conspired with the Ziegenfusses to sell artwork that
Neither of you have any legal right to possess on the following website:**

http://www.artnet.com/Galleries/Artists_detail.asp?G=&gid=425931369&which=&aid+4758&ViewArtistBy=online&rta=http://www.artnet.com/artist/4758/salvador-dali.html

**You are hereby requested to immediately remove such listing and direct
the return of such ILLEGALLY removed art back to Robert.**

STAGE 3 : After the consumption of the Plaintiffs income stream was realized, clients,
and Suppliers through the application of fraud redirected , a uncollectible
state for monies owed to Plaintiff, enhanced the scheme along with the usage
of Suppliers to increase injuries through blackmail, defamation, conversion
and extortion.

These Extorted Properties surfaced at Robin Rile's public offerings shortly thereafter.

See Exhibit B hereto.

46. As early as November of 2007 Robert and Lourdes Ziegenfuss claimed public ally to control, to own all assets of Plaintiff, and announced fraudulent intentionally misleading statements, to consume potential purchasers to feed their Racketeer based corporate network, open new corporate identities, and in the process to destroy through illegal conduct the Plaintiffs, lifework, identity and image. This email using the Robert & Lourdes Ziegenfuss private email account rziggi@gmail.com is one of many examples for such illegal, damaging representations. In October of, 2007 Robert & Lourdes Ziegenfuss wrote to Artist Yuqi Wang yuqiawang2000@yahoo.com :

Lourdes and I have opened a new Gallery in St. Armands circle in Sarasota. R&R Bond Gallery. We offer only the highest Quality originals works from artists such as Salvador Dali and Auguste Rodin. As you know we were very successful selling your works on Palm Ave. and would like to represent you in St. Armands Circle. We did not sell our Gallery or the rights of the artists we represented to the Debberts. We feel that your works would fit in very well with the high end artwork we offer. Please feel free to examine our Website so you can become familiar with what we have to offer. Please let us know that you have received this email. Thank you very much Lourdes and Robert R&R Bond Galleries

(On Oct. 31, 2007 at 11:14 pm Mr. Wang respondent to this email indicating his interest to work with Bob and Lourdes Ziegenfuss)

47. To sustain and prevent detection of the Scheme to defraud, the Defendants Planned and executed the elimination of the Plaintiff as corporate Agent and Art Dealer , along with the Plaintiffs separation from all his assets, as John C. Willard's (News Channel 7 Sarasota employee) email on April 15th 2009 illustrates:

I can remember on two separate occasions while I was working at R&R Bond Galleries that I witnessed Bob Ziegenfuss announce himself as the President and owner of R&R Bond Galleries to guests as they were inquiring what his position in the Gallery was, When I first met him in 2008 and asked him if Robert Preiss and him were partners ie. The R&R in the title of the place, he told me that Robert WORKED FOR HIM, AND HE IS THE OWNER OF THE GALLERY.

48. The Defendants Robert and Lourdes Ziegenfuss additionally used fake art such as Botero sculptures for personal enrichment, using fraudulent appraisals, fraudulent certificates testifying to authenticity and value, with fake signatures placed on such sculpture offerings, to induce unsuspecting art investors. The Defendants Yank and Yvette Barry used Edgar Degas forgeries supported with fraudulent misleading, deceptive appraisals and Documents of Authenticity , along with fake signatures, for personal enrichment. As public ally announced on :

<http://appraiserworkshops.blogspot.com/2011/08/degas-bronze-appraisal.html>

Last September Yank Barry was arrested in Sofia airport with a Malaysian that he Introduced as the son of the Premier minister he was the one who transported it for him the moment customs found it in Malaysian hand bag Yank Barry admitted that it was his statue and he will come back soon with the papers of the owner.....Customs confiscated it for smuggling in and out fake Degas statues, the Degas is still in custody of the authorities, awaiting for trial if convicted he will face few years in Jail.

49. The Defendants Robert & Lourdes Ziegenfuss, used the scheme to withdraw huge amounts of funds to withdraw economical substance from the Plaintiff. Part of such funds gained from Plaintiff, the Defendants used to make small interest deposits on artwork, that later was subject to Grand Theft , by the Defendants. The summery of damages related to the art work the Defendants consumed totals with 1,182,500,00 US dollar. See exhibit C hereto.

50. The Defendants Yank and Yvette Barry accompanied by a fake Federal Agent, using a fake badge , extorted with the application of intimidation and fear for life art , Furniture , Computer, bookkeeping material, mail, Gallery equipment, Porsche rims and tires, Gallery displays and mail exceeding the value of 5 million US dollar from Plaintiff. See exhibit D hereto (affidavit of witness Mandy Agostini).

51. The Defendants Robert & Lourdes Ziegenfuss, and Yank and Yvette Barry provided the artwork illegally consumed from Plaintiff to Defendants Reed Horth, and Robin Rile Fine Art Inc, for the purpose of international sale offerings, offerings to previous clients of Plaintiff. Defendants combined executed and advanced the scheme for the sole purpose of personal enrichment.

52. The Defendants Masterpiece Publishing Inc. , Daniel Wynn, and Triad Art Group publishing Inc , Greg Bloch , used the co Defendants scheme for the purpose of personal enrichment, and injured in the process the Plaintiff, beyond the financial aspect of injuries. Defendants used the financial resources and investments of Plaintiff to distribute

artwork through Robin Rile Fine Art Inc to clients of Plaintiff., leaving the Plaintiff without gain, just expenditures. Art specified from the Artist : Jose Royo, Ilic Boban, M.L Snowden, for which the Plaintiff invested millions of dollars , and marketed internationally under the weight of extensive expenditures over 10 years, was subject to the Deceptive unfair Trade practices act , Tortuous Interference, Trade secrets Clarification act (TSCA and FEEPEA) extortion, Grand Theft and Fraud, with the sole beneficiary being Robin Rile Fine Art Inc. and the Defendants.

53. The Defendants Masterpiece Publishing Inc. , Daniel Wynn, Triad Art Group publishing Inc., Greg Bloch, Stanley Warren, Richard Clarvit knew about the scheme of properties belonging to the Plaintiff, being sold through the Defendants Reed V. Horth, Robin Rile Fine Art Inc., without being ever paid for. Single Offerings of such properties exceeded the actual value of 400,000,00 US dollar.

In an email message dated September 29th. 2010 at 6.25 pm, Robin Rile Fine Art inc. proposes to clients of Plaintiff, the Sculptures "Surrealist and Cubist Angel "by the Artist Salvador Dali. The usage of copyright protected material belonging to Plaintiff, the photo material related to the home of Robert Ziegenfuss at which the stolen properties have been moved too, identify the gravity of the scheme and the numerous violations committed by the Defendants. Similar emails related to Ilic Boban , Jose Royo and ML. Snowden art work , have been used for the purpose of personal enrichment.

54. The Defendant Stanley Warren realized with Reed Horth, Robin Rile Fine Art Inc. an agreement without knowledge or approval from Plaintiff, related to the acquisition of art. The scheme to translate a personal contract of Reed V. Horth with Stanley Warren to a personal liability of Plaintiff, and to offer these items through Robin Rile realized injuries of extensive proportions. See Stanley Warrens sculptures identified on Robin Rile's "houzz" site "Salvador Dali curation", hereto:

<http://www.houzz.com/projects/71498/Salvador-Dali-curation-and-artwork>

Richard Clarvit knowing of these scheme with intend failed to disclose at court such material fact, instead realized additional injuries by making false official statements.

55. The Defendant Richard Clarvit on December 13 2010 at 7.50 pm in an email to Plaintiff stated :

The suit against Robert and Lourdes Ziegenfuss and Reed Horth has the potential for a recovery of damages of at least 2,000,000, to 6,000,000 (million) US dollar.

The scheme and its astronomical financial dimension materializes from factual events and documents including "his very own", that are testimony to the damages, the Plaintiff encountered. The Defendant Richard Clarvit clearly knew about each of them, and participated actively to eliminate such facts, when the Night club involvement, payoff became a lucrative financial subject.

56. To sustain and prevent detection of the scheme to defraud the Defendant Clarvit eliminated, ignored, overlooked important documents including a fake 23 million US dollar money wire, Daniel Wynn provided to Plaintiff to establish sufficiency of funds related to a 3,100,000 US Dollar debt, existent towards the creditor Plaintiff, from the debtor Masterpiece Publishing Inc., and Daniel Wynn, assuring him payment will reach him soon for artwork purchased by him , that was stored at the "Vault" of Miami.

57. Counsel witnessed and knew about numerous priceless properties, consumed from Plaintiff, eliminated without any legal grounds for such seizures and consumption, but failed to ever act, protect, recover such assets. Perjury, impeachment, recovery of property the Defendant overlooked and realized through such act, additional damages, which reflect the Injuries he himself identified, in his correspondences to the Defendants.

58. The scheme that lead to the asset transfer involved not only the offerings of properties or merchandise of Plaintiff, for highly reduced prices, but extended by inflicting continuous fear realized through **"Murder for Hire calls**. On April 15th 2009 Lucia Silva Neyra Gonzales informed in a notarized document under oath with witnesses Carmen Basurto Levia and Magaly Rosales Toro , the Plaintiff and his family that a phone call made by Lourdes Ziegenfuss has reached her .

In such call Lourdes Ziegenfuss as identified by the witness stated:

On April 8th three o' clock pm. Mrs. Lourdes Ziegenfuss called me asking if I could do a job for her. The Job consisted of damaging Mr. Robert and Ilona Preiss life's. Telling me she would pay me 1000 US dollar (American Dollar) she wanted them miserable or dead.

In May of 2009 Defendant Clarvit wrote :

According to Lucia Silvia Nevia Gonzales' signed affidavit dated April 15, 2009 Lourdes solicited Ms. Gonzales to seriously injure or MURDER Mr. Preiss and his wife Ilona Preiss.

59. Announcement to seek the death of Plaintiff and his loved ones the Defendants made on numerous occasions which exhibit E hereto establishes. The Defendants association with the Canadian, Russian and Italian Mafia was used to issue verbal threats. (see exhibit F hereto, Investors hub from June 10th 2011) Mafia Character followed the Plaintiff and his family. Dead animals have been placed around the business and home, and the homicide attempt to push the Plaintiffs than wife of the street in her car with child , realized a visual of upcoming injury of life , in every aspect. The willful consumption of Plaintiffs freedom, and related plunder of all remaining property in excess of 10 million US dollar summarizes the RICO injuries with death in all aspects of life, leaving just the physical existence of Plaintiff . Davedia Gruber ex wife of the Defendant Yank Barry, illustrates the Mafia crime pattern of the Defendant within the family see:

<http://ezinearticles.com/?When-a-Husbands-Abuse-Drives-Your-Daughter-to-Suicide&id=4042730>

<http://ezinearticles.com/?How-Do-You-Sleep-at-night?-I-Wrote-This-True-Story-in-Hopes-That-it-Can-Help-Someone&id=3965535>

that led to the death of her Sister and death of their own daughter.

60. The Defendant Yank Barry of course never addresses in his fraudulent media appearances, any of the issues raised by his ex wife. Fraudulent public representations based on deceiving , inducing & misleading the public, cover the true identity of Gerald Falovitch aka Yank Barry who is surrounded with organized crime, and internationally ranked on top of the “ International Black list of Brokers and Business man ”“see:

<http://www.gomopa.net/Finanzforum/index.php?form=Search&searchID=1278947&highlight=Yank+barry> hereto and the “Diligizer Blacklist” .

V. REAPING OF PROFITS AND CAUSING LOSSES

61. Each of the Defendants profited from their participation in the scheme alleged herein, as set forth in detail below. With regard to the Art work subject to Grand Theft, these high valued items the Defendants offered to reduced prices, inflating the artwork in addition to the injury, of the Plaintiff not being paid for.

As Reed V. Horth under the umbrella of the Racketeer operated and financed corporation Robin Rile Fine Art Inc. in a message dated September 29, 2010 to clients of Plaintiff proposed :

**Edition of 12 Bronzes(Edition of 8+4 Proofs) Total edition of 8 plus four Proofs, bronze monumental, 163cm tall x 85 cmx 50 cm, cast at Bonvicini F foundry, Italy patina : black, Literature Descharnes Robert & Nicolas. Catalogue Raisonne “ La Dur et la Mou”, pg. 148-149 Ref #382, Certification: Gala Dali foundation, Figuras Spain and Robert Descharnes, Provenance Salvador Dali to original publisher to Present owner. Exhibitions : an example from this edition was shown at Museum of Bycantin & Christian Art, Athens (Greece) January 15- March 24, 2009
Present List: 425,000-495,000 USD
Price : 325,000 USD**

Simply put, not only did Plaintiff never receive the 425,000 - 495,000 US dollar of his artworks value, even the 325,000 US dollar the Defendants demanded from the buyer, was never paid to Plaintiff. Offerings such like this represent the pattern of the scheme to defraud, which realized substantial gains for the Defendants. Additional gains also have been realized in the areas of :

- A) Sales tax that was never paid
- B) Income tax from such properties sold
- C) Taxes related to the assets consumed that lacked identification in personal and corporate Tax returns,
- D) Costs related to the client data, accumulated over a 20 year timeframe of Investments
- E) Costs related to the Art supply with Vendors that required investments in the millions over 10 years , to resume the exclusivity of distribution.
- F) Costs related to marketing the products within the US and Internationally to make it Desirable for Art Connoisseurs world wide, over a 15 year time span.
- G) Costs related to numerous retail facilities displaying, marketing these museum works to the public, in order to familiarize themselves with the product, and its significance.
- H) Costs related to exhibits, Vernissage, one man shows that consumed hundreds of Thousands of dollars, within a 15 year time frame. Around 50,000 US dollar each such event required to be even considered

I) Plaintiff sacrificed his personal time for 20 years to market, grow his corporate art Distribution network. Weekdays and Weekends he dedicated to the Art Galleries in order to maintain over 15 years a profitable state for each corporate entity. These Investments represent the most significant saving, for the Defendants, since along with the time invested , the creativity and accumulation of intellectual properties from Plaintiff, copied and used by the Defendants realized the scheme to withdraw income, assets, and international recognition, and to resume Plaintiffs' identity , which clearly enhanced the profitability of the Scheme, for its participants.

See hereto the Plaintiffs offering and copyright protected photo of Salvador Dali's

"Venus de Milo" purchased from California art dealer Richard Kolosky Sen.. at :

http://www.google.com/search?client=safari&hl=en&biw=1024&bih=690&tbm=isch&sa=1&ei=MkYGUvjKEpKI2AXhgoDYCg&q=R%26R+Bond+Galleries+Salvador+Dali+Venus+de+milo&oq=R%26R+Bond+Galleries+Salvador+Dali+Venus+de+milo&gs_l=img3...14108.14108.015214.1.1.0.0.0.289.2-1.1.0...0...1c.1.24.img..1.0.0.Wxi22Y_NY0Q#biv=i7C0%3Bd%7C2wXKnSNWBp81UM%3A

The Defendants not only offered this sculpture for which the Plaintiff paid in excess of 80,000 US dollar, but used the Plaintiffs copyright protected marketing material, see hereto :

http://www.yelp.com/biz_photos/robin-rile-fine-art-miami?select=bILOtm5MRY5N1sPoD9-Sow#bILOtm5MRY5N1sPoD9-Sow

to market the event and the artwork internationally. In fact the entire exhibit consisted of Properties that are in one way or the other Plaintiffs properties.

Additionally the Defendants manipulated and altered property of the Plaintiff by changing the tone of the background color, to create the appearance of a new visual.¹ The scheme to apply fraud, and theft and to use the assets gained for the purpose of personal enrichment, is confirmed in numerous illegal acts, reflecting the same "pattern" founded on the willful intend, to take over the Plaintiffs operations and assets. To cover their tracks the Defendants cleaned the World wide web from Plaintiffs offerings/visuals, related to this rare sculptural work see the following link hereto :

http://www.artnowonline.com/galleries/RR_BondGalleries/Salvador_Dali/Salvador_Dali_Details.php?CodArtista=A200604013&mObra=O2008050051

Without the existence of Plaintiff, and the summery of his assets, from which he has been willfully deprived off, Robin Rile Fine Art Inc. would not exist, income not be possible. The Racketeer based artificial entity realizes a clear visual of criminal conduct, in every aspect of its operations. .

62. The Defendants Scheme was with intend also directed towards long term business partners of Plaintiff . The lack of access to his assets, the lacking of "interest" related to the market value and investments realized, eliminated cash flow and liquidity. Interest rates, profits, profits lost due to the inflation process initiated by the Defendants, effected the Plaintiff and numerous business partners along with his high maintenance corporate operations, extensively. The Defendants knew by eliminating income, excess to his merchandise, financial economical impact follows, that ultimately drives the Plaintiff

¹ The Defendants unauthorized usage, reproduction and distribution of copyright protected properties realized Federal violations as identified in 15 U.S.C. 1114 (1), 18 U.S.C. 2319, 19 U.S.C. 1337

out of business. Death in every economical aspect was the goal of the scheme to defraud, that all Defendants intentionally participated in.

63. The Theft of Trade secrets as identified in the 2012 Clarification act allowed the Defendants to use such confidential data and material , for the purpose of

- a) converting sales,
- b) converting clients,
- c) redirect merchandise sold to clients,
- d) redirect suppliers
- e) interfere with contractual agreements,
- f) to consume expensive , marketing instruments and use them for international offerings
- g) resume the Plaintiffs identity
- h) to use corporate documents for the scheme
- i) to control the flow of information,
- J) to use criminal copyright infringements for profit

These acts allowed the defendants to entirely control the financial performance, profitability of the Plaintiff, furthering personal enrichment founded on the fraudulent scheme.

64. Under the title "Recent Art Placements" see : [pintrest.com/robinrile/recent-art-placements/](https://pinterest.com/robinrile/recent-art-placements/) hereto , Reed V. Horth through Robin Rile Fine Art Inc., uses Plaintiffs home, his properties, accomplishments, photo material, clients homes, art work plaintiff sold, to realize a fraudulent visual of competent leader ship. Personal Images that Plaintiff initiated and stored on his personal and corporate computer related to his home and showroom , Reed V. Horth managed to transfer to his computer and identified as :

Recent Art Placements, Frederick Hart Sisters", ¾ life scale, Private Collection, St. Petersburg, Florida. 2006

Since 1996 we have specialized in the location, procurement and placement of Original works from Spanish master Salvador Dali, including original paintings Drawings, watercolors, sculptures, graphics. We have placed works in

international Private and Public collections, gardens, museums, and investment collections, including for members of the Forbes and Fortune 500.

**Product specification: Sold By ROBIN RILE FINE ART/visit store
Category Artwork, Style Mediterranean**

and on <http://trade.nosis.com/en/robinrile.com/4204790/s>Forbes 500
Fortune 500, Carlos Slim Helu, Tuan, M.L. Snowden, Boban, Fernando Botero
.....Edgar Degas....Salvador Dali....Arman Fernandez

See hereto the Plaintiffs profile :

<http://www.minneapolisartgalleries.com/Video-Detail/Premier-Gallery/48/96SYhTJAu4A>

http://blondesearch.ru/index.php?key=Dali_sculpture&page=1

<http://www.artfinding.com/News/Salvador-Dali-Monumental-Collection-sold/3.html?LANG=al>

<http://www.tvclip.biz/video/aOqPo8h6R2Y/dali-expert-for-exhibition.html>

65. The properties the Defendant public ally claims to have placed in St. Petersburg Florida have been in truth located in Sarasota Florida, and on display in 2008 In Plaintiffs home and Showroom for high end collectors. At that time the Defendants furthered the execution of their scheme to defraud. In this short public announcements personal and confidential materials have been used, and converted to self serving lies to deceive the art community. Fraudulent Inducement of competence and creditability, belonging to the Plaintiff, lead to the extensive injuries as identified in this claim..

Endless examples of identical nature are featured in Exhibit B which realized huge profits for the Defendants under the application of intentional international Fraud, executed through the venues of Global Media, causing losses in the millions.

VI. DEFENDANTS CONDUCT

66. Global Village Champions Foundation Inc. Actively and knowingly participated in various Aspects of the scheme. Yank and Yvette Barry have been heavily involved in the scheme, reaping of assets from Plaintiff through unlawful activity, gained through extortion and the application of "fear for life and income". (emphasis added) Through such criminal acts the Defendants managed to secure a substantial amount of assets exceeding 5,000,000 million US dollar from Plaintiff. These properties shortly thereafter the Defendants either displayed in their personal home shipped out of the country, or provided to Robin Rile for sale. Samples for such Robin Rile offerings are :

Ask Art (the artist bluebook" World wide edition") Prestige Scale Bronze Ed. 2/9 Foundation Bonvicini, Verona Italy) Price identified above 25,000 US dollar

www.houzz.com/photos/1411262/Salvador-Dali-curation-and-artwork-mediterranean-artwork

www.houzz.com/photos/1411308/Salvador-Dali-curation-and-artwork-mediterranean-artwork

Salvador Dali Curation and artwork " Gala Gradiya, Art Net Galleries " Gala Gradiya" # I of only 9 PE examples in Bronze,Contact Gallery....Robin Rile Fine Art inc for price

The scheme included but was not limited to the distribution of Edgar Degas forgeries which the Defendants offered and sold as originals to Galleries. Additionally Yank Barry managed to extort and steal with wife Yvette numerous paintings, sculptures among them significant monumental casts such as :

- 1) "The Winged Triton" Monumental valued with 450,000 US dollar
- 2) "Nude Ascending the Staircase" Monumental Gold Patina (the only one world wide Featuring this Patina) valued with 950,000 US dollar
- 3) "Gala Gradiva" Monumental, valued with 450,000 US dollar for which Yank Barry Converted fake Degas replicas, as payment.
- 4) "The Snail and Angel " by Salvador Dali valued with 50,000 US dollar among many others

67. From the beginning of the scheme Yank Barry used the façade of Global Village Champions foundation, to reflect creditability to his Art ventures. Fraudulent accordingly paid, appraisals issued by Stewart Waltzer, had the sole function to create the "illusion of authenticity", and value. The scheme to pretend for these sculptures to be by Edgar Degas authorized , was confirmed and identified through such fraudulent issued appraisal and authentication. These values, reflected public and private market evaluation based on recent auction results, from casts as early as 1920 realized. The sculptures distributed exclusively by Yank Barry's, by his definition emerged from the lifetime plasters of Degas. In truth no one knows from where these recently found plasters are. The Appraiser Mr. Waltzer limited his statements to false, "fraudulent evaluations" and himself declines the Authentic state for these forgeries. He states hereto :

" This Appraiser and his appraisal [do] not warrant the Authenticity of the 74 Edgar Degas Bronze sculptures from the 1998 Valsuani edition marked "Set VII/IX."

68. Stewart Waltzer knew or should have known that such evaluation is simply the inducement to fraud, and personal enrichment his own included , from which the Global Village Champions foundation excessive use made, to provide cash into the personal accounts of Yank and Yvette Barry. Fraudulently collected Donations involving famous boxer friends to feed the hungry, as alleged have been used to promote the distribution for such forgeries, supporting the lavish lifestyle of the Defendants. The supplier of these forgeries , “ The Degas Sculpture Project Ltd.” filed on June 28th 2013 in the second circuit of New York’s district court a complaint for FRAUD and NON payment for the Edgar Degas works, alleging the Global Village Champions foundation to be in actuality an instrumentality of Fraud utilized for the personal enrichment of its founder, directors and officers . Yank Barry claimed to the Plaintiff to have personally paid “15 million US dollar” for these “copies“, forgeries, as identified, evaluated and by Art researcher , Art Scholar & Author Gary Arsenau, who described them as worthless brass counterfeits.(see exhibit G hereto)

69. For the Defendants to sustain and prevent the detection of the scheme to defraud the Plaintiff , each of the casts have never been stamped “REPRODUCTION” as required by French law, where these cast have been manufactured, and from where they have been shipped. By ignoring French Statues and Laws these casts in its entirety are subject to criminal activity and fraud. French Law allows an artist to make only TWELVE copies, and each must be numbered. If more than twelve bronze casts are

made, they must be marked "reproduction". By violating the fundamental laws in the country of its origin, and to ship such illegal fraudulent items via international freight services, realizes a intentional violation of federal mail and fraud statues as identified in 18 U.S.C. §§ 1341, 1343, 2319(b), 2320 and 17 U.S.C. 506(a)(1)(A)

70. The intentional lacking of such essential seal/identification, placed on these Edgar Degas casts, that would have confirmed for these casts to be copies, and not as by the Defendants claimed originals, was realized to induce and defraud buyers and claim high values. This represents not only a serious violation for any appraiser to ignore such material lawful fact, but more so provides a perspective of the dimension of the scheme and the extensive amount of additional parties involved, that all applied fraud for the sole purpose of personal enrichment, under the criminal violation of intentional concealment..

71. The scheme additionally involved extortive fraudulent acts that communicated the possibility of violence or serious adverse consequences. Yank Barry issuing such threats based them on his international ties to the Mob and his reputation related to such connections. Yank Barry's resourceful criminal network is described in the Friday June 10, 2011 article of :

investorshub.advin.com/boards/read_msg.aspx?message_id=64117209 as follows :

.....- Nazareli's friends were having a party in Aruba talking about ways to do Serious harm to the US. Economy. It was a low key affair, just some boys drinking Vodka on the beach, soaking up the sun, and talking about market Manipulation. The host of this Party was a fellow who uses the alias Yank Barry, though his real name is Gerard Falowitch. Some of the other boys at the party were key associates of the Mafia capo Phil Abramo. By this time Abramo had been imprisoned, but he was Still considered the "King of Wall Street".

He was also the man who helped merge The Wall Street operations of the Russian Mob and La Cosa Nostra..... Yank Barry a.k.a. Falovich is a Russian who is tied to the Dubois Gang, an affiliate of the Sicilian mafia in Montreal.

72. Mandy Agostini was scared for her safety and life as Yank and Yvette Barry accompanied by an alleged fake Federal Agent entered the Gallery to plunder it.(see Affidavit exhibit D hereto) From the entire high end Inventory, to furniture, to displays, bookkeeping records, mail, computer, millions of dollars in art, he even took possession of brand new rims and tires of a Porsche Turbo , and vanished with these valuable assets , leaving just the intimidating threat behind, to:

- 1) “ to immediately seize any form of dialog with Robert Preiss, so no knowledge related to this criminal acts, theft from his side exists“**
- 2) “to immediately leave Florida for good, and never to return.**
- 3) “ to find another guy, since the Plaintiff will never set a foot on American soil again.**

Knowing of the Defendants call for murder in the recent past, until today fear has not only effected extensively the Plaintiff, but initiated serious anxiety's and medical conditions, for his fiancé, as her extensive medical records are testimony off.

73. Each Defendant in one or other way has applied serious injuries, based on using “fear as a key element” to accomplish gains. Fear that forced Ilona Peterfy Preiss with the Plaintiffs son to leave America, and to find protection in the Dominican Republic. Fear that secured , gains for the Defendants, that hardly ever surfaced on balance sheets.

74. The Defendants used Racketeer fed corporate artificial entities to hide assets and money drained through criminal activity. Reed V. Horth never had savings, never owned art. Huge funding generated from the Plaintiffs losses, was placed behind Reed V. Horth and Robin Rile fine Art Inc., to realize the global visual of a market leader. The key element of the scheme is truly the pre mediated murder of the Plaintiff and the corporations he lead in every public and economical aspect.

R&R Bond.....

www.youtube.com/user/SalvadorDaliGallery/feature+watch, translated into R&R Robin Rile **www.SalvadorDaliSculptures.com/html/dali.html** . The Plaintiffs Salvador Dali Gallery on the world wide web, translated into Salvador Dali Sculpture, by the Defendant. 100 Million US dollar of Art Placements in 15 years the Plaintiff had to show for, are now used by the Defendants, as mark of achievements, see :

www.yelp.com/biz/robin-rile-fine-art-miami hereto. The scheme to defraud extended to suppliers, contracts, any and all trade advantages and secrets that have been converted from Plaintiff to the Defendants. Exact same web content and wordings from Plaintiff are used by the Defendants in all aspects of global communication, and are financed with Extensive gains from Plaintiffs losses. As Defendant Clarvit Stated in his April 2nd., 2009 Document :

**You make similar claims which appear based off Robert's accomplishments on:
<http://www.navmz.com/search/reed/v./horth/2485062> . You state "Over 10 years
In the field of with projects totaling over 100 million US dollar in major
Monumental Paintings as sculpture, into museums, institutions, and private**

collections around the world. Recent world wide placements have included monumental Sculptures in UK, Spain, Hong Kong, and Mexico". Again you do not have Roberts permission to credit yourself with his and his Galleries sales.

75. False, misleading and intentional manipulated facts are used in the process off marketing artwork that either belongs to the Plaintiff or was at some point in his retail Facilities, to international affluent collectors that emerged from the investments and portfolio of Plaintiff. The Defendants use Pinterest, Artnet, houzz, yatedo, robin rile.com, Artprice, Saatchi gallery network international, Askart and many more to sell artwork gained through criminal activity . If we compare:

www.saatchigallery.com/dealers_galleries/Gallery.php/R&r+Bond+Galleries/2120.html/

www.saatchigallery.com/dealers_galleries/FullSizeArtWork/dg_id/19968/image_id/21857/imageno/10

we find the sculpture L' Ame de Venus that the Plaintiff purchased from Artco France Paris from which it was shipped to Plaintiffs' Sarasota location. Also see

www.artfinding.com/Artwork/Installations/ARMAN-French-1928-2005/L-Ame-de-Venus/2437.html hereto which shows the "stolen" artwork offered by the Defendants .

76. The artworks value currently, since the artist deceased in 2005 can be estimated beyond 300,000 US dollar, which are up to this date not satisfied with the Plaintiff. The sculpture upon acquisition was extensively marketed by the Plaintiff on a global scale including the media the Defendants use today, through print, film and video material as, www.youtube.com/watch?v=RXTgG81aeY4 does confirm.

This example not only visualizes the financial gain related to the artwork consumed through criminal acts, but the financial losses and gains related to create world wide recognition and awareness' for such rare works of art to be available, through the marketing expenditures of Plaintiff. The Plaintiff as the you tube listings found at :

www.youtube.com/user/SalvadorDaliGallery/videos?view=0

visualize, occupied through huge investments that stretched over a 20 year timeframe , world wide a unique space in the art community that by itself realizes an extensive value for which the Plaintiff requires compensation, through this honorable court.

77. To sustain, advance and prevent detection of the scheme, each defendant required the elimination of the Plaintiff in his physical aspect, along with the elimination of all documents and records , corporate and personal, the elimination of his computers corporate and personal, his isolation through death or theft of freedom , the elimination of assets and income have been the common goal. Kick backs and bribes manipulated the state of injury of the Plaintiff, in which all Defendants participated.

78. The Plaintiffs counsel not only knew about the millions of dollars owed to his client but increased injury through years of financial advancements himself, which the Plaintiff provided to him . The Defendant as alleged not only collected art, money, a Bentley he drove for years realizing expenses exceeding 4000 US dollar monthly, from Plaintiff but additionally Richard Clarvit as alleged received from the Defendants

financial compensation, to remove properties identified as evidence, bookkeeping records , his computers, art, and by eliminating their options for recovery in a deportation scheme. .

79. The Defendant Clarvit conducted willful criminal acts by exposing the Plaintiff to a fraudulent trial, that lacked any and all evidence consumed by the officials, and for which no property sheet was ever surrendered to Plaintiff from counsel. No depositions ever have been initiated, and witnesses called.

80. To sustain and prevent detection of the scheme to defraud the Plaintiff Clarvit submitted to case number : **2009CF012588NC** a motion to dismiss issued to the Circuit Court of the Twelfth judicial circuit, in and for Sarasota county, in which he stated:

Overview of facts.....On August 21, 2006 Robert Preiss and Stanley Warren Entered into an agreement.....

As the court records, the contract itself and the testimony of Stanley Warren identify, Reed Horth personally on Rodin International business documents, realized such contract and offered Stanley Warren's art on the Robin Rile Fine Art Inc. website, Art price , Artnet, houzz, and to clients of Plaintiff among others. In fact under the subject recent art Placements.....**SOLD BY: Robin Rile Fine Art/ Visit Store**, the Defendants Reed V. Horth and Robin Rile Fine Art Inc. public ally announced to have sold Stanley

Warrens sculptures to collectors see “Terpsichore” prestige scale and “Dragon swan Elephant” prestige scale and “Winged Triton” prestige by artist Salvador Dali at :

<http://www.houzz.com/photos/1411299/Salvador-Dali-curation-and-artwork-mediterranean-artwork> .

81. To sustain and prevent detection of the scheme with intend properties such as “Le Desir Hyperrationell” the Sarasota officials consumed, valued with 75,000 US Dollar, vanished from the proceedings and surfaced again as alleged on 7/16/2013 on EBAY See

<http://www.ebay.com/itm/Daum-Salvador-Dali-Sculpture-LE-DESIR-HYPERRATIONELL-No-277-300>

hereto, where it was offered for 45,000 US dollar.

82. Over 200,000 US dollar in Art , and numerous “priceless” properties disappeared after they have been consumed from the Plaintiffs retail facility. After the one million dollar Heist from the Defendants Robert & Lourdes Ziegenfuss, this criminal violation of the Plaintiffs’ constitutional rights , realized additionally a huge economical impact.

83. The Defendant Clarvit had full knowledge of the scheme and the enormous losses the Plaintiff faced. On October 11 2009, at 11.14 am he faxed the Plaintiff copies of Invoices related to the debts of the Defendants, amounting to over one million dollar .

84. Counsel knew about the Court emergency filings of Ilona and Robert Preiss related too" fear for life " and "Murder for Hire" (See Sarasota Court Case Number 2009 DR 009233 NC, Uniform, Case Number 582009DR0092330000NC, Filing type: " REPEAT VIOLENCE ", Filing Date 06/01/2009, hereto) along with blackmail, extortion, fake money wires from Masterpiece publishing, mail and wire fraud, tax fraud, sales of stolen properties via internet, Espionage. as the letter issued by Defendant Richard Clarvit identified, on April 2nd, 2009 in which the Defendant Clarvit wrote:

.....such as violating the Florida Deceptive and Unfair Trade practices act, and Counts of unfair competition, civil conspiracy, tortuous interference with contractual relationship, tortuous interference with advantageous business relationship, and civil theft charges, among many other possible counts.

.....Mr. Ziegenfuss has allegedly and fraudulently referred to himself as a "partner", "shareholder", president, sole "owner" of R&R Bond Galleries Inc.

..... Mr. Ziegenfuss also allegedly threatened my client concerning his immigration status after you were caught stealing Robert's proprietary information. It is hereby requested you IMMEDIATELY return the following pieces which were allegedly illegally stolen from the Gallery and which you have no legal right to possess :

- a) Surreal Angel large proof 4/4 valued 450,000 US dollar
- b) Cubist Angel small valued \$ 50,000
- c) 3 Salvador Dali Daum sculptures valued 75,000
- d) Arman Venus valued 240,000
- e) Femme a Flame valued 40,000
- f) Madonna of Port Lligat valued 80,000 US dollar
- g) The Shade Silver with motorized Pedestal
- h) Salvador Dali Daum plate valued \$ 5000

85. The scheme to sell such properties through the Racketeer based corporate entity Robin Rile Fine Art Inc., was known to the Defendant Clarvit. He additionally was at all times aware of all criminal actions the Defendants engaged in, and that realized the criminal takeover of any and all business operations, and the Plaintiffs personal life. Clarvit as alleged from summer of 2009 on participated. His involvement, realized the essential requirement of the scheme, to infinitely separate the Plaintiff from his assets, life, and identity, and as alleged personally financially benefited , through a short Delray Beach Nightclub involvement, with Strip club owner "Bell bottoms" Ruby Inc., James Layson . He used the Plaintiffs trust, his lack of knowledge in all legal affairs , for his personal enrichment.

86. From 2008 Robin Rile Fine Art Inc. marketed Art offered and sold by Masterpiece Publishing Inc., and Triad Art Group publishing Inc. and directly competed with the Plaintiff, using the Plaintiffs clients and marketing strategies/medias distributed through the United postal Service and the internet , for the purpose of personal enrichment. Over 1,3 million US dollar of expenses the Plaintiff needed to yearly satisfy, to offer merchandise from the Defendants internationally. The Defendants supported this Robin Rile Fine Art Inc. venture and defrauded in the process the Plaintiff not only of his investment, but encouraged and furthered the crimes, that impacted also the personal life of Plaintiff.

Such offerings are :

A) ROYO / Triad Art Group Publishing/ Greg Bloch

http://www.artnet.com/artwork_images_42425931369_673764_royo.jpg
<http://www.artnet.com/artwork/426206580/425931369/royo-untitled.html>
<http://web.artprice.com/store/Robin-Rile-Fine-Art/?classified%5Bidartist%5D=MzA5MTMzMDEyODEyOTkyMS0=&l=en>
http://google.com/search?q=robin+rile+fine+art+Royo&client=safari&hl=en&tbo+isch&tbo+u&source+univ&sa+X&ei=Quj_UaWAD4GG9QTsslC4Dg&ved+0CEAQsAQ&biw=1024&bih=690#
<http://www.google.com/search?q=robin+rile+Royo+fine+art+placements&ie=UTF-8&oe=UTF-8&hl=en&client=safari>

B) Masterpiece Publishing Boban/ M.L. Snowden

<http://robinrile.com/blog/?p+781>
<http://web.artprice.com/store/Robin-Rile-Fine-Art/?classified%5Bidartist%5D=MTAzMDYyNjE1ODI0ODlyLQ==>
<http://www.artnet.com/artwork/426266034/425931369/m-l-snowden-photon.html>
www.robinrile.com/
<http://www.latinamericanart.com/en/galleries/robin-rile-fine-art/contact-info.html>
<http://trade.nosis.com/en/robinrile.com/4204790/s>
<http://robinrile.com/blog/?p=2192>
<http://www.artnet.com/artwork/426262699/425931369/boban-centaurus.html>
http://www.askart.com/AskArt/artists/search/Search_Grid.aspx?searchtype=DEALERS&artist=11183233

These links are just few samples in reference to subsequent violations that advanced the scheme to defraud the Plaintiff, and allowed the maintaining of Rico based income, up to this date. Defendant Clarvit issued demand from April 2nd, 2009 addressed such crimes:

You are hereby requested to immediately CEASE and DESIST the following: any and all contact with Roberts suppliers, clients, consignors, and artists. you are committing serious violations of the Law by interfering with Roberts contractual relationships. This contact is being monitored and if it is not immediately stopped upon receipt of this letter you shall be subjecting yourself to litigation.

87. Fear for life, loss of Freedom and continued theft of assets was in accordance to the premeditated scheme. These acts identified as obtaining property from another through force of violence and fear, describe criminal violations the Hobbs Act § 1951(a) establishes and for which the Defendants are liable in context of their actions and the law. These criminal acts realized injuries of priceless proportions. The lacking of an official CEASE and DESIST order issued to the Defendant Robin Rile Fine Art Inc and Reed Horth ., by the coconspirators confirms and summarizes the active involvement from each member in this scheme to defraud, and therefore actively promoted personal enrichment from Racketeer gained assets, and funds.

88. The 8000 square foot night club "Pineapple Groove", the Defendant Clarvit remodeled and opened in accordance to the scheme, switched ownership under a year Later see hereto: http://blogs.browardpalmbeach.com/countygrind/change_of_venue/ and was at the exact same time of Plaintiffs conviction, passed to James Layson of 88's entertainment. The Broward Beach new times even stated :

Delray Beach music venue "Pineapple Groove" has already switched ownership under a year of its Grand opening.

In May of 2010 just 2 days after Robert Ziegenfuss is completing his sale of a Sarasota Ritz Carlton condominium (<http://www.yourobserver.com/realestate/052620106341/>), Richard Clarvit incorporated this Night club. The Defendant James Layson Ex partner of the Mobsters George de Simone, Claudio Carmona initiated the strip joint Bellbottoms on

racketeer gained funds that have been used to establish and maintain the operations of this club. (liquor license included)

(<https://bulk.resource.org/courts.gov/c/F3/297.F3d.1154.00-15998.html>) It is alleged that Jim James Layson familiar with Racketeer networking, participated ,with the Defendants in the scheme, that would provide, concealed payment to the Defendant Clarvit to sustain, prevent detection, of the fraudulent scheme. His affiliation to the Mob until today is identified on:

<http://www.corporationwiki.com/Florida/Delray-Beach/james-w-layson-P4532315.aspx>

Corporationwiki states :

James Jim Layson is associated with Ruby Inc. and holds several roles such as Director and President. James W. Layson has 3 known relationships including George de Simone, Scott Jaspon, and Craig Zuckerman and is located in Delray Beach, Fl.

People who visited this profile also visited

- 1) Ruby Inc**
- 2) Richard N. Clarvit P.A.**
- 3) Craig Zuckerman**
- 4) Yank Barry**

VII. THE PLAINTIFFS PROPERTIES SUBJECT TO EXTORTION, GRAND THEFT

89. Between the spring of 2008 up to the current date the Defendants jointly Managed to secure properties and assets, that have been prior in Plaintiffs control. Issuing As described in Paragraph ,50,51,58,59,66,72,77,84, 90 threats that indicated extensive

economical loss, or loss of life realized an ongoing pattern from which the Defendants generated personal enrichment.

90. On July 28th, 2011 Ilona Peterfy Preiss and the Plaintiff in presence of witness Michael Taylor, described the events as follows :

RP.: When was the first time that Lourdes told you that there is going to be a Closed sign on the gallery and that I am gonna be DEAD? When was the first Time that these threats have been made to you?

IP.: You know I don't remember exactly the date of these, but

RP.: Okay. How long before they left was that? Or was it at the time when they left?

IP.: It was like two months before

RP.:there was all the time some Mafia guys hanging around the gallery and the houseto just scare the hell out of us and to get us out of town.

IP.: Yeah, basically, out of town, you know, my sons life is the most important Thing. I cant leave the place, you know ALL THE TIME I am Scared, afraid

RP.:.....at the time when we opened the Gallery, which was the most prestigious place in Sarasota. I think you agree with that.

IP.: Yes

RP.: We had over 10 million US dollar inventory in this place. Really spectacular. I was making advertising on television and also talking about my recent sale (to Carlos Slim Helu's foundation) the big transaction. Remember?

IP.: Yes

RP.: And didn't they tell everyone in town, everyone who entered, that they OWNED the place

IP.: Yeah.....He says the Gallery is hisall of that yes

91. Additionally to maintain, advance and to succeed in their scheme to Defraud, extort and steal , the usage of active Espionage was by the Defendants jointly applied . On Wednesday August 5th ,2009 at 3.14 pm OWL Digital Security provided to The Plaintiff following conclusive report :

INCIDENT REPORT

Unauthorized User	YES,
Unauthorized Access	YES
Espionage	YES
Miss Use	YES
Web and Mailhacking with misuse of information	
Possibly rogue ex-employee involvement	

92. The criminal takeover of Plaintiffs operations realized the foundation for every gain the Defendants jointly realized. The items subject to Grand Theft are not limited to, irreplaceable art, but additionally to irreplaceable properties that would

- A) Secure income
- B) Identify the Creditor Plaintiff and Debt owed to him and the Corporations he lead as Agent.
- C) identify Authenticity and Ownership of Plaintiffs artwork
- D) would secure safety to Trade secrets and market advantages build over a 20 Year time span
- E) would protect copyright protected properties of Plaintiff
- F) would Protect against Extortion, and Blackmail
- G) would have prevented the loss of Freedom
- H) secure essential evidence related to the crimes the Defendants jointly committed, in court identified as FBI file by the officials
- I) have Protected the image as accomplished international art dealer

- J) provide credit and creditability in all economical aspects
- K) allow the Plaintiff to secure his personal and business flow of information Globally

93. Such properties for example are identified as :

- A) Computers corporate and personal
- B) Software and Computer storage devices and discs
- C) Any and all Bookkeeping records from 2005 up to this date
- D) Any and all Ownership and Authenticity Documents
- E) Any and all Invoices
- F) the FBI file related to the summery of Defendants Racketeer acts
- G) Personal Documents such as GREEN CARD and Birth Certificate
- H) Client and Supplier Data, email addresses, phone numbers, purchases, And debts owed to Plaintiff
- I) Any and all Supplier and Consignor Data
- J) Any and all Furniture and Display investments, realized over 15 years
- K) Personal items such as a Montblanc Meisterstuck Watch with Lapis Lazuli Dial, See hereto :
[http://www.pensinasia.com/lapis lazuli dial power reserve.htm](http://www.pensinasia.com/lapis_lazuli_dial_power_reserve.htm)
- L) New Porsche Turbo Rims and Tires
- M) Numerous Motorized and rotating Pedestals for which over the years Over 100,000 US dollar have been spent with PEASE acrylic Chicago
- N) Brochures, Catalogs, business card, and other marketing material
- O) Mail
- P) Exclusive Christmas décor for 2 Galleries accumulated over the years
- Q) Art Books, Guest Books, pricelists and other corporate properties

94. To extort from the Plaintiff items such as “ Landing of Glorious Figure”

and “ Inspiration ” by Artist Boban, , the Defendants claimed to have shipped in May of 2009 to Plaintiff that Robin Rile Fine Art Featured in numerous offerings see :

<http://www.google.com/search?q=robin+rile+boban+%22inspiration%22&ie=UTF-8&hl=en&client=safari#bav=on.2,or.&fp=2504887aafd3497e&hl=en&q=robin+rile+boban+sculpture+Landing+of+glorious+figure>
hereto.

95. From 2008 until 2009 Robert and Lourdes Ziegenfuss extorted and gained on a foundation of fraud and threat of DEATH economically and physically against the Plaintiff and his family the following items:

- a) **"The Winged Triton" the Defendants switched the cast the Plaintiff Purchased from the publisher OBRA Spain, with the cast owned by Stanley Warren (Witness Alfred Rose Ritz Carlton Sarasota)**
- b) **"The Shade" Auguste Rodin**
- c) **"Eternal Printemps" Auguste Rodin**
- d) **"The Cubist Angel" Salvador Dali**
- e) **"The Surreal Angel" Salvador Dali**
- f) **"Femme en Flame" prestige scale Salvador Dali**
- g) **"Hysterical Venus de Milo" Salvador Dali**
- h) **"The Leibnitz Cross" Salvador Dali**
- i) **"Madonna of Port Lligat" Prestige Scale Salvador Dali**
- k) **"Pate de Verre" 52 cm Salvador Dali**
- l) **"Pate de Verre" 36,3cm**
- m) **"Genesis" M.L. Snowden**
- n) **"Antares" M. L. Snowden**
- o) **"White Acrylic Motorized display pedestal" Plaintiff purchased from Pease Acrilic Chicago**

These items have been offered and sold by Robin Rile world wide to clients of Plaintiff and marketed thorough media streams the Plaintiff used to promote these art investments see :

<http://www.houzz.com/photos/1411258/Salvador-Dali-curation-and-artwork-mediterranean-artwork->

<http://robinrile.tumblr.com/post/5841073527/arman-french-american-1928-2005-lame-de-venus>

<http://robinrile.com/blog/?p=781> hereto.

96. In August of 2009 without lawful authority the consumption of numerous Sculptures including but not limited to the “ Hyperrational Desire “ by Salvador Dali see http://m.youtube.com/#watch?feature=pipp&v=Kunh_xA2191 was conducted eliminating in excess of 200,000 US dollar inventory, that was never accounted for by the officials. Additionally as Paragraph 81,82 identify, numerous priceless properties, have been subject to as alleged theft conducted by the officials, violating oath and numerous , constitutional rights and laws. No property Warrant, or property sheet, was ever provided to Plaintiff, attached to the foot of each property , furthering the scheme and increasing fear for property, freedom and life. Plaintiff alleges that “ abuse of regulatory powers of State official” that extracted property , eliminated property , inflicted additional injuries advancing the scheme on behalf of the Defendants. “ Public favors, for private gains’ are alleged to extort, steal and injure the Plaintiff. The Defendant Clarvit knew and should have known, that the summery of these illegal acts, practically initiated the corporate and personal death of Plaintiff.

97. In fall of 2011 just days after the Plaintiff was victimized and through the scheme suffered from loss of his freedom, Yank Barry as identified in the paragraphs 1,2,3,4,5,6,9,11,13,27,35,36,37,39,42,43,48,51,57,58,59,60,61,62,63,66,67,71,72 and 89 used such as alleged arranged opportunity to realize the final plunder of Plaintiffs assets and the completion of the scheme. As outlined in Paragraph 58, 59, 71,72,& 90 with the application of fear for life, and under the pretense of being authorized through the Federal Authorities to such theft, Yank and Yvette Barry in presence of an as alleged fake female

FBI agent in her early 50 s., blond hair , flashing a badge , (reassembling a friend of Yvette Barry, that like Ziegenfuss lived at some point in the Ritz Carlton Beach residences, and that introduced and offered the fake Degas casts Yank Barry distributed, to collectors and galleries) , took control of the assets identified as:

- “ The Winged Triton” Monumental by Salvador Dali**
- “ Gala Gradiva” Monumental by Salvador Dali**
- “ Gala Gradiva” prestige scale by Salvador Dali**
- “ Nude Ascending the Staircase” monumental Gold Patina Salvador Dali**
- “ Nude Ascending the Staircase” prestige scale Salvador Dali**
- “ The Snail and the Angel” Prestige scale by Salvador Dali**

Along with other “numerous museum quality art” that consistet of framed and unframed Original “paintings” ranging between 10-100,000 US dollar each, “Faberge eggs” , various sculptures and all items as described in paragraph “93” which are in some cases irreplaceable (emphasis added) . From the Charles Eames leather office chairs to the desk, filing cabinets, bookkeeping records , rugs, the computer, mail, the entire Inventory and all remaining assets accumulated over a 15 year Timeframe, have been consumed. Estimated 5 million US dollar on damages Yank Barry inflicted in addition to the injuries he and Yvette Barry caused in the timeframe of 2009-2013, founded on extortion and fraud . The scheme at all times demanded the active participation, in the process of elimination of evidence, the plaintiff, and the concealment of extensive gains, realized through criminal, fraudulent acts, in which everyone directly or indirectly participated. Such pattern of concealment was required to escape any and all tax liabilities in the process of personal enrichment.

See some of Robin Rile offerings, related to properties stolen by Yank and Yvette Barry hereto :

http://www.askart.com/askart/artists/search/inquiry.aspx?artist=9000030&ad=184989&searchtype=ART_FOR_SALE

<http://www.artnet.com/artwork/426075852/425931369/salvador-dali-gala-gradiva.html>

<http://robinrile.com/blog/?p=2058>

THE PLAINTIFFS PURCHASES

98. The Plaintiffs fine art acquisitions date as far back as 1998. It was essential to promote and successfully execute the scheme to destroy any and all evidence linked to Purchases made from suppliers, consignors, and sources such as Ebay and other Auction houses. The consumption of such pertinent documentation also realized the tremendous opportunity to increase the amount of involved parties, applying black mail and extortion for personal enrichment. Additionally as alleged fraudulent insurance claims in some cases might have been filed , realizing huge beneficial gains for the conspirators, founded on the Plaintiffs victimized lack of documents, establishing payments, and transfer of title. The inducement to Fraud with the applied theft of properties, weakened the Plaintiff which furthered the scheme.

99. The example of the Defendants Masterpiece Publishing Inc. providing as in Paragraph 94 identified art to Robin Rile and to demand payment from Plaintiff is one of

numerous cases related to such fraudulent illegal acts. In truth any and all artwork Masterpiece publishing identified as to have been shipped to Plaintiff, can be found on the offering portfolio of Robin Rile Fine Art Inc. See the following links hereto :

<http://robinrile.com/boban/boban.xml>
<http://robinrile.com/blog/?p=2192>
<http://www.artnet.com/artists/boban/>

100. On June 2nd, of 2009 Masterpiece publishing cashed a 50,000 US dollar Check from Plaintiff, claiming just a few weeks later non payment for items the Defendants Robin Rile Inc. was offering. The scheme to extort, defraud Plaintiff not only of his income and assets, but his entire life's work and freedom, is the most willful part of the Scheme.

101. On May 25th 2011 at 9.09 pm the artist Boban wrote to the Plaintiff to have been owed in excess of 500,000 US dollar from Masterpiece Publishing Inc., and Daniel Wynn for Boban Art, he sold to Galleries, and never was paid for. He stated :

Hi Robert!

I really made up my mind. I go legal, to legal rights. Strong and direct. So much Damage he's been made (referring to Daniel Wynn) to my life. On the end of

the day, enough is enough . I would like to work with you on legal side and help myself , and you.

He intended to sue Masterpiece publishing for taking money from Galleries, such as the one the Plaintiff lead as agent, and never to pay him for the artwork he provided.

On May 30th, 2011 Boban wrote :

So much damage, really. For example I agreed to make a 25,000 \$ Sculpture after I finish and finance materials 12,000 \$. NOTHING REALY HAPPENED.no matter how much I work for Masterpiece MATHEMATICS, I have to pay the company back.....unbelievable people

102. The scheme to defraud extended way beyond this tort. The Defendants applied reckless fraudulent illegal acts, for the sole purpose of personal enrichment. Boban's wife died on cancer since he could not pay for the medications, and treatments required, due to his exposure to fraud.

103. The Plaintiff operated Art Galleries since 1997 and until 2009 realized each Year positive results. His accounting firm " Personalized Business Solutions Inc." maintained all financial operative subjects, tax filings and audits, related to the corporations, and the individual Robert Preiss. Each entity realized up to the exposure of the Defendants Racketeer acts, profits on an annual foundation. As featured on the world wide web, see hereto:

http://m.youtube.com/#playlist?list=UUZ0cBjYZCTuGkLNjZfo2lPw&desktop_uri=P%2Fplaylist%3Flist%3DUUZ0cBjYZCTuGkLNjZfo2lPw

Huge investments and purchases realized the unique, prestigious, and extensive museum display, to realize global market leadership.

To inflate these property values, to promote artwork subject to Grand Theft , to base the scheme simply on withdrawing all substance from the Plaintiff, inflated these investments the Plaintiff for 15 years made, and through a criminal take over entirely lost, identifying the Defendants as sole beneficiary.

104. The Defendants ripped off assets that realized significant Investments, that Personalized Business Solutions by Plaintiffs request on July 13, 2009 itemized and identified as follows:

Dear Robert,

Further to your recent request, please find hereafter the details of payments by Your company to various suppliers in 2006 through 2009. This information was Obtained from your company's BANK statements and all transactions were made By WIRE transfers.

1) Obra Contemporanea Salvador Dali Sculptures

12/ 29/06	100,000,00 US dollar
01/09/07	30,000,00 US dollar
04/10/07	25,000,00 US dollar
07/12/07	690,00 US dollar
08/01/07	15,000,00 US dollar
10/05/07	100,000,00 US dollar
11/23/07	10,000,00 US dollar
12/10/07	10,000,00 US dollar
01/29/08	15,000,00 US dollar
02/15/08	10,000,00 US dollar
03/26/08	10,000,00 US dollar
04/29/08	12,000,00 US dollar
04/28/09	15,000,00 US dollar

2) QU ART SA. Salvador Dali Sculptures

01/16/07	178,500,00 US dollar
06/28/07	80,000,00 US dollar
07/18/07	82,000,00 US dollar
12/10/07	60,000,00 US dollar
12/31/07	30,000,00 US dollar
01/22/08	31,200,00 US dollar
03/06/08	20,000,00 US dollar

04/09/08	20,000,00 US dollar
06/04/08	20,000,00 US dollar
10/14/08	15,000,00 US dollar
12/01/08	15,000,00 US dollar
04/17/09	15,000,00 US dollar

3) Artco France Arman "L' Ame de Venus " , Salvador Dali Sculptures

10/12/07	32,000,00 US dollar
10/26/07	25,000,00 US dollar
11/06/07	70,000,00 US dollar
11/30/07	10,000,00 US dollar
12/28/07	20,000,00 US dollar
02/01/08	60,000,00 US dollar
03/06/08	15,000,00 US dollar
04/28/08	15,000,00 US dollar
06/02/08	15,000,00 US dollar
12/09/08	10,000,00 US dollar
01/23/09	9,999,00 US dollar
03/25/09	10,000,00 US dollar
04/24/09	10,000,00 US dollar
05/22/09	10,000,00 US dollar

4) I.A.R. Art Resources Ltd. Salvador Dali sculptures

11/09/06	15,353,27 US dollar
12/01/06	60,000,00 US dollar
12/11/06	57,860,00 US dollar
12/11/06	15,865,93 US dollar
12/18/06	19,856,00 US dollar
12/21/06	14,894,96 US dollar
12/22/06	7,947,14 US dollar
01/12/07	28,193,50 US dollar
01/19/07	6,875,19 US dollar
01/23/07	48,000,00 US dollar
02/05/07	51,792,00 US dollar
05/14/07	12,172,13 US dollar
07/12/07	18,342,26 US dollar
05/06/08	10,962,00 US dollar

06/06/08	13,800,00 US dollar
07/02/08	7,400,00 US dollar
07/10/08	7,600,00 US dollar
07/21/08	14,000,00 US dollar
12/22/08	16,000,00 US dollar
05/05/09	30,000,00 US dollar
05/07/09	30,000,00 US dollar
05/12/09	9,000,00 US dollar

105. As the Defendants applied a pattern of Fraud, and actively engaged in Rico violations, and by doing so activated the Hobbs act § 1951 (a) , the Plaintiff in contrary establishes through these extensive acquisition payments made, a pattern of substantial Monthly art investments, that he realized up to the point the criminal takeover of Plaintiffs operations took Place, and Robin Rile in December of 2008 was incorporated. In summery these four supply sources, reflect the amounts paid for properties subject to Grand theft and that combined identify a satisfied purchase amount of **2,238,217,76 US dollar**. These are just four of numerous other sources the Plaintiff used for Gallery acquisitions and therefore reflect just a fraction of the Investments and properties the Plaintiff purchased in a 24 month time frame , and that are subject to Grand Theft. See Exhibit A hereto.

106. Based on the Plaintiffs current knowledge, the persons who constitute a group of individuals persons associated in fact who constitutes a RICO Enterprise that is referred to herein as Robin Rile Fine Art Inc., "lack in their financial records, such

Payments” (emphasis added) for merchandise offered in public illegal sales solicitations. From the Financial records and books of the Defendants it shall be determined , how the process of personal enrichment advanced from 2007 up to the current date. All these offerings the Defendants supplied, to the Plaintiffs international collector community, and following sales are as alleged founded on extortive, fraudulent Interstate activities, effecting interstate commerce.

107 . As to the Defendants Masterpiece Publishing Inc. the Accounting firm “Personalized business solutions” identified in such overview of facts the payments made by Plaintiff to the Defendants Masterpiece Publishing within 24 months , (not addressing the 10 years Prior to 2007 of extensive investments) as follows :

01/19/2007	Check Nr. 1325	Amount: 10,000,00 US dollar
02/20/2007	Check Nr. 1408	Amount: 14,900,00 US dollar
03/27/2007	Check Nr. 1778	Amount: 8,000,00 US dollar
04/30/2007	Check Nr. 1537	Amount: 10,000,00 US dollar
04/30/2007	Wire	Amount 7,000,00 US dollar
04/30/2007	Wire	Amount 7,000,00 US dollar
04/30/2007	Wire	Amount 7,000,00 US dollar
04/30/2007	Wire	Amount 7,000,00 US dollar
05/31/2007	Wire	Amount 7,000,00 US dollar
05/31/2007	Wire	Amount 5,000,00 US dollar
06/26/2007	Check Nr. 1650	Amount 4,450,00 US dollar
06/30/2007	Wire	Amount 7,000,00 US dollar
07/21/2007	Check Nr. 1702	Amount 15,000,00 US dollar
07/31/2007	Wire	Amount 7,000,00 US dollar
08/31/2007	Wire	Amount 7,000,00 US dollar
08/31/2007	Wire	Amount 4,000,00 US dollar
09/29/2007	Wire	Amount 6,500,00 US dollar

10/31/2007	Wire	Amount	6,250,00 US dollar
11/30/2007	Wire	Amount	6,250,00 US dollar
03/05/2008	Check Nr. 2229	Amount	20,000,00 US dollar
04/30/2008	Check Nr. 2322	Amount	417,00 US dollar
05/09/2008	Check Nr. 2359	Amount	12,800,00 US dollar
07/14/2008	Wire	Amount	12,800,00 US dollar
09/08/2008	Check Nr. 2563	Amount	10,000,00 US dollar
11/14/2008	Wire	Amount	10,000,00 US dollar
11/16/2008	Check Nr. 2592	Amount	10,000,00 US dollar
12/14/2008	Wire	Amount	10,000,00 US dollar
03/13/2009	Wire	Amount	6,000,00 US dollar
03/13/2009	Wire	Amount	5,950,00 US dollar
06/02/2009	Check Nr. 3145	Amount	50,000,00 US dollar

108. The active pattern of paying extensive amounts of money to acquire artwork the Plaintiff applied and confirmed in paragraph 104,107,111 visualizes clearly the extensive fraud applied to separate him from his assets. Not ONE (“1 “emphasis added) item acquired from Plaintiff is today under the control of Plaintiff due to the racketeer scheme the Defendants combined inflicted. The Defendants are bragging, offering these assets world wide, by using all of Plaintiffs investments, properties and accomplishments , for the sole purpose of personal enrichment.

109. The Defendants clearly lack history of such acquisition records which in the case of Masterpiece Publishing Inc reflects in 24 months a total of artwork purchases of **293,817 US dollar**, and use Plaintiffs properties intellectual included, for international fraudulent inducement realized with deceiving, fraudulent marketing instruments , as the financial records and books of the Defendants shall confirm accordingly. Not a single Sculpture the plaintiff today possesses from these numerous acquisitions.

In truth money the Defendants made between 2007 to this date is money lawfully belonging to the Plaintiff. The Robin Rile Fine art Inc. Website since its Initiation reflected entirely the properties of the Plaintiff, the achievements' of Plaintiff and the losses of the Plaintiff, and is therefore a substantial instrument in the advancement of the scheme.

110. In February of 2009 the Plaintiff invested in an extensive exhibit dedicated to the Spanish painter Jose Royo. Over 50,000 US dollar the Plaintiff spend to realize an exhibit, that did not spare any expense. From Champagne, to petite fours, and extensive marketing expenditures that included a prestigious invite, print media, brochures , catalog and video & film marketing instruments see :

<http://m.youtube.com/#!/watch?feature=plpp&v=MFave2r0X-M> hereto.

111. Single purchases exceeded 100,000 US dollar for art the Plaintiff acquired from the Defendant Triad Art Group Publishing Inc. Related to such acquisitions wires such as a 48,000 US dollar payment provided through the Plaintiffs Bank of America account wire confirmation number 903712150137516 followed. Through a scheme of fraud, deceit, perjured affidavits, perjury at court, declining Robin Rile Fine Art Inc. Jose Royo offerings, the Defendants eliminated any and all investments the Plaintiff realized in a 15 year timeframe.. The following link realizes a truthfull visual to where the plaintiffs assets and investments have been directed. See :

<http://www.google.com/search?q=robin+rile+Royo&client=safari&hl=en&tbm=isch&tbo=u&source=univ&sa=X&ei=rPoEUuugGsG4yQH7pIDIAQ&ved=0CC8QsAQ&biw=1024&bih=690#> hereto.

IX. RACKETEERING/RICO ALLEGATIONS

PATTERN OF RACKETEERING ACTIVITY

112. Defendants did knowingly, willfully and unlawfully engage in a “pattern of racketeering activity” within the meaning of 18 U.S.C. §§ 1961 (1) (3),(4),(5), by committing at least two acts of Racketeering activity, i.e. indictable violations of 18 U.S.C. §§ 1341, 1343, and 18 U.S.C. §§ 1951, 18 U.S.C. §§ 1962, as described above, within the past four years. In fact each of the Defendants has committed multiple acts of Racketeering activity. Each act of racketeering was related, had a similar purpose, involved the same or similar participants and means of commission, had similar results and impacted similar the victim/Plaintiff.

113. The multiple acts of Racketeering activity which Defendants committed and /or conspired to, or aided and abetted in the commission of, were related to each other and amount to and pose a threat of continued racketeering activity, and therefore constitute a “pattern of racketeering activity” as defined in 18 U.S.C. § 1961 (5).

COUNT I: CONSPIRACY

114. Plaintiff incorporates by reference all the above identified paragraphs as if fully set herein. The Defendants have violated 18 U.S.C. 1962 (c), by conduction participating directly or indirectly in the conduct of the affairs/scheme Robert and Lourdes Ziegenfuss and coconspirators Reed V. Horth and Robin Rile Fine Art Inc. initiated. The RICO Enterprise a group of persons, individuals, corporations and

foundations through a "pattern" of racketeering included acts indictable under 18 U.S.C. §§ 1341, 1343.

115. As a direct result and proximate result the Defendants intentional lies, misrepresentations, manipulations, fraud and omissions' as herein alleged, the Plaintiff has been injured in his business and or property by the predicate acts which make up the Defendants "pattern" of racketeering activity through Robin Rile Fine Art Inc., or in the alternative, the Global Village Champions Foundation Inc., Yank and Yvette Barry, Masterpiece Publishing Inc., Daniel Wynn, Triad Art Group publishing Inc., Greg Bloch, Reed V. Horth, Richard Clarvit, 88's Entertainment LLC., James Layson, Intuortho Medical LLC., Ziegenfuss LLC., Zarasota Medical products LLC., Robert & Lourdes Ziegenfuss, and Stanley Warren.

116. The Defendants at all times have been in agreement to pursue the identical criminal objective to actively conspire and to pursue such plan in accordance to the scheme. In Violation of 18 U.S.C. 1962 (d), Defendants have set fourth the above, conspired to violate 18 U.S.C. 1962 (c). The conspiracy commenced at least as early as 2007, and continued up to this date. The object of conspiracy was to gain control over the Plaintiffs extensive assets and to use such tangible and intangible/ intellectual assets for profit. Each of the Defendants knowingly, willfully and unlawfully agreed and combined to conduct or participate, directly or indirectly in the conduct of the affairs and activities of Robin Rile Fine Art Inc., or in the alternative the Global Village Champions

Foundation Inc., Yank and Yvette Barry Masterpiece Publishing Inc., Daniel Wynn, Triad Art Group publishing Inc., Greg Bloch , 88's Entertainment LLC., James Layson, Richard Clarvit, Robert & Lourdes Ziegenfuss, Intuortho Medical LLC, Zarasota Medical Products LLC., Ziegenfuss LLC., Reed V. Horth and Stanley Warren through a "pattern of racketeering activity, including acts indictable under 18 U.S.C. §§ 1341, 1343, in violation of 18 U.S.C. § 1962.

117. The Defendants committed numerous overt acts of racketeering activity or other wrongful activity in furtherance of such conspiracy. The purpose of the acts that caused injury to Plaintiff was to advance the overall objective of the conspiracy and the harm to Plaintiff was a reasonable, foreseeable consequence, of the Defendants' scheme.

118. Defendants carried out their scheme in different States and Internationally and could have not done so unless they used the postal service or private or commercial interstate carriers.

119. Each of the Defendants engaged in multiple overt acts in furthering of the conspiracy, including misrepresenting the true owner, value, and origin of the properties, that the Defendants combined consumed, but obtained without payment of its value and marketed, distributed world wide, through an "associated group" of individuals, corporate entities and foundations, that have been "acting together" as a racketeer based organization. (18 U.S.C. § 1961 (4))

120. The Defendants in accordance to their scheme employed marketing tactics that reflected fraudulent inducement, lies, inflated values, false misleading context, that knowingly induced new victims , that would have not purchased art offered by the Defendants if they would had known the truth.

121. The Defendants made or directed others to make false statements or omissions of material facts, in connection to properties belonging to the Plaintiff.

122. The Plaintiff and others relied to their detriment on the Defendants misrepresentations, lies, omissions and deceptive behavior of Defendants which were done in furtherance of their conspiracy.

123. The Defendants continuously , marketed, advertised, offering for sale items identified as forged/counterfeit sculptures by Edgar Degas and Fernando Botero, among others. Within the pursuit of the scheme, the Defendants used fraudulent values, authentications, unauthorized use of artists signatures , fraudulent shipping documents, mail and wire fraud, to distribute such forgeries. Only through active conspiracy such criminal acts could remain concealed and the profits maintained.

COUNT II : FRAUD

109. For the purpose of executing and/or attempting to execute the above described scheme to defraud or obtain money by means of false or fraudulent pretenses,

representations or promises, Defendants in violation of 18 U.S.C. 1341 , caused matter and things to be delivered by the postal service or commercial interstate carriers. These acts were done internationally, intentionally and knowingly with the specific intent to advance the Defendants scheme. At all times the Defendants had knowledge of their illegal fraudulent conduct but maintained the pattern of fraud, to continue to gain personally and to feed the Racketeer based organization through such illegally materialized gains.

110. Based on the Plaintiffs current knowledge the following persons, group, or individuals persons associated in fact constituting a RICO enterprise engaging in numerous counts and elements of fraud and that are referred to herein as Masterpiece Publishing Inc., Daniel Wynn, Triad Art Group Publishing Inc, Greg Bloch, Stanley Warren, Global Village Champions foundation Inc., Yank Barry, Yvette Barry, Intuortho Medical LLC. Ziegenfuss LLC., Zarsota Medical Products LLC., Robert Ziegenfuss, Lourdes Ziegenfuss, Robin Rile Fine Art Inc., Reed V. Horth, Richard Clarvit, 88's Entertainment LLC., James Layson

111. The Defendants a group of persons associated together for a common purpose Engaged in the following elements of fraud,

- 1) claiming assets belonging to Plaintiff to be their own public ally, lack identification to the IRS for such illegal gains**
- 2) internationally offering such assets to clients of Plaintiff with copyright protected marketing material of plaintiff for profit**

- 2) marketing these works with lies fraudulent sales offerings, designed to mislead the potential buyer, for profit.
- 3) creating a profile and Identity public ally that is false and fraudulent for profit.
- 4) Using mail and wire fraud to market, distribute, and move assets not belonging to them, for profit.
- 5) Using mail and wire fraud to distribute forged art, that has never been authorized by its creator, for profit.
- 6) Pretending to be holding copyrights and legal authority to use intellectual property belonging to Plaintiff, for profit.
- 7) Using confidential corporate data not belonging to the Defendants for Profit.
- 8) agreeing to actively use and finance interstate carriers to impact interstate Commerce, for profit.
- 9) agreeing to manipulate the values of properties, and to distribute such properties without authorization of its owner, for profit.
- 10) using the media for defamation to further the scheme, for profit.
- 11) creating, using, manipulation documents, to mislead ,induce and defraud Buyers, for profit.
- 12) operating with assets, income, and resources not belonging to the Defendants and intentionally withholding such assets, income and resources from Plaintiff for profit.
- 13) manipulate, steal, withhold electronic devices from Plaintiff for the purpose of Espionage and profit.
- 14) eliminate, suppress, withhold properties from Plaintiff to cause loss of freedom and maintain profit.
- 15) provide public favors for personal gains , for profit
- 16) use fraudulent affidavits, perjury for profit
- 17) using Forged signatures on documents and artwork for profit.
- 18) destroying or stealing documents of liabilities and debts, identified as Invoices and eliminate liabilities through such act, for profit.
- 19) pretending to be in mutually beneficial relations to steal, defraud and execute a scheme for profit.
- 20) apply fraud in all aspects of tax filings related to gains, and assets the individuals, corporations, partners, associations, foundations or any other group associated to the RICO enterprise consumed, stole, or Arranged to be stolen, for profit.
- 21) Incorporating artificial entities, and foundations, with the Secretary of the State, on a foundation of fraud, for the purpose to defraud and for profit.

COUNT III : EXTORTION

112. The Defendants needed an organization and system that reflected an aura of fear. The Defendants used implicit and explicit threats to realize a fearful state of mind. Such threats included but have not been limited too:

- A) Deportation**
- B) to Murder (threat of death and bodily injury) the Plaintiff and family**
- C) to financially destroy the Plaintiff**
- D) to take his freedom**

113. The Defendants used the enterprise to generate income through a pattern of racketeer activity. The "pattern" to extort assets by force, and under the application of fear, and to use such assets to increase the plaintiffs damages establishes a violation that activates the Hobbs Act indictable under 18 U.S.C. § 1951 as to all Defendants.

114. The Defendants reputation and association to organized crime elevated the possibility of violence or serious adverse consequences due to their close affiliation with the MOB see paragraph 58, 59,71,88,90. See Yank Barry Extortion conviction Canada, Texas, and meeting affiliation with the MOB hereto:

<http://news.google.com/newspapers?nid=861&dat=19960327&id=G7RjAAAAIBAJ&sjid=ToEMAAAIBAJ&pg=2054,1032958>

http://vastdom.blogspot.com/2012/10/the-miscreants-global-bust-out-chapter_4489.html

<http://www.offshorealert.com/forums.aspx?g=posts&t=37812>

115. The multiple acts of Extortion additionally realized extensive liabilities the Defendants through unlawful conduct initiated, created, through which assets from

Plaintiff could be consumed. Such acts included, fake art sold or traded for authentic works of much higher value , false affidavits, perjury, claiming to have shipped art without order, approval from plaintiff, and without consent and confirmation for Plaintiff to ever have received such artwork.

Numerous such extortive acts the Defendants engaged in, committed and willfully, unlawfully applied to consume through them assets belonging or under the control of Plaintiff which realized liabilities for Plaintiff the Defendants resumed, and for which Restitution is required .

COUNT IV : VIOLATIONS OF THE FLORIDA DECEPTIVE TRADE PRACTICES ACT.

116. Plaintiff hereby incorporated by reference to the above paragraphs as if fully set forth herein. The Florida Deceptive and Unfair Trade practices act provides for a civil cause of action for [u]nfair methods of competition, unconscionable acts or practices, and unfair or deceptive acts or practices in the conduct of any trade or commerce (FDUTPA) §§ 501.201 ET Seq., Fla. Stat. (2005)

117. The Defendants are in direct violation of the Trade Secret Clarification Act (TSCA and FEEPEA) through the unlawful conduct they combined applied for profit, causing extensive injuries for Plaintiff.

118. The conduct of the Defendants as alleged herein, including the intentional willful use of lies, misrepresentations, collusions, manipulations, kick backs,

omissions, mail and wire fraud, distributing lies through the global media, and other tactics in furtherance of an overarching scheme to steal the assets (intellectual included) of Plaintiff, convert such assets illegally, inflate their values of illegally gained properties, and to withhold their market value from Plaintiff, is unfair, unconscionable and or deceptive in that it is immoral, unethical, oppressive and unscrupulous and further, is injuries to but not limited the Plaintiff.

119. The Lanham act section 43(a)(1)(B), provides for the Defendants violations of false advertising, literal falsehoods, intentional lies, among others a civil cause of action for making "false and deceptive statements in commercial advertisement". The cause of action Plaintiff addresses is founded on the Defendants willful "pattern" to "have known for statements made to be untruthful/false, at the time they made them. " The Lanham act violations of Defendants entitle the Plaintiff to remedies in accordance to such violations.

120. The Defendants abuse and use of copyright protected material, art, proprietary material, confidential trade advantages such as but not limited to 18,000 affluent collectors globally, and supplier network furthered the Defendants unfair and deceptive conduct as alleged herein. It additionally supported the omission of material facts which promoted the illusion of ownership and global leadership, founded on Fraud and deceptive trade practices, which clearly violated Florida statutes.

121. The Defendants combined applied unfair, unconscionable, misleading and deceptive conduct, initiated losses and actual damages as result including the extensive

amounts paid for assets the Defendants unlawfully converted, embezzled, extorted, and or stole, in the process of their scheme.

122. The unfair , unconscionable, deceptive and misleading acts of the Defendants have mislead Plaintiffs own clients (among them Forbes 500 number one ranked Carlos Slim Helu) , suppliers, clients, business partners, the media and the average individual, and did in fact mislead the Plaintiff.

123. The Defendants are liable to Plaintiff under the FDUPTA, the TSCA , FEEPEA, and for violations related to the Lanham act § 43(a)(1)(B) for the losses resulting from their unfair, unlawful, deceptive conduct alleged herein, and the Plaintiff therefore is entitled to all of the remedies provided by the Statue, the Lanham act , the deceptive unfair TRADE PRACTICES Act, for the Defendants unlawful conduct.

COUNT V : UNJUST ENRICHMENT

124. As a result of the scheme alleged herein, the Defendants sold , shipped , gained through properties , they are not entitled to offer, sell, distribute and move through interstate and international carriers.

125 . The Defendants at all times have been aware of the related benefits/profits causing injuries for Plaintiff and others. Regardless of such injuries caused the Defendants advanced, continued to consume such illegally gained properties and profits, regardless of the actual dimension of injuries such unlawful conduct causes.

126. As a result of the Defendants unjust enrichment the Plaintiff has sustained damages in an amount to be determined at trial and seek full disgorgement and restitution of Defendants enrichment, benefits, and ill hootenanny gains acquired as a result of their illegal, unfair and deceptive practices, acts.

COUNT VI : DEALING WITH STOLEN PROPERTY

127. Plaintiff hereby incorporates all the above listed paragraphs as if fully set forth herein . As a direct result of the scheme alleged herein the Defendants unlawfully, knowingly, and intentionally violated U.S.C. § 2314 and 2315 for profit. Properties not belonging to the Defendants have been unlawfully transpired within interstate and foreign commerce. As the properties have been by the Defendants stolen, converted, embezzled, extorted, by fraud and through the financing of interstate and international carriers, moved for profit.

128. Defendants knew that properties consumed, stored, concealed, bartered extorted and sold are not Defendants properties. Knowingly, willfully through the ongoing "pattern" of fraud , unrelated innocent parties have been involved, induced to which such properties have been moved via interstate or international carriers, after the have been extorted, stolen, converted, embezzled, or unlawfully have been taken.

129. The Defendants at all times had knowledge that the items stolen, extorted, embezzled, converted or unlawfully taken, exceeded the amount of 5000 US dollar.

130. As a result of Defendants violation of 18 U.S.C. § 2314, and 2315 unjust enrichment has been the result. Plaintiff sustained damages in an amount to be determined at trial and seek full disgorgement and restitution of Defendants enrichment, benefits and I'll gotten gains acquired as a result of the unlawful or wrongful conduct.

131. Further the Plaintiff is seeking restitution and disgorgement of any and all profits realized by the Defendants as a result of their unfair, unlawful, and or deceptive practices they engaged in from 2007 up to this date.

COUNT VII : RACKETEERING ACTIVITY/ HOOBS ACT MURDER FOR HIRE

132. As a result of the scheme alleged herein as identified in the paragraphs 50, 58,59,71,72,73,84,87,90,97,112,113,114,the Defendants extortive acts have been subject to obtaining property under the application and wrong full use of fear. Numerous threats of murder, murder for hire, murder for hire calls, attempts of bodily harm. These unlawful acts allowed the Defendants to maintain concealment , continue unlawful taking, against the Plaintiffs will, for profit.

133. As set forth the Defendants violated U.S.C. §1961 (a)(b)(c) (d) and 18 U.S.C. §1951 (a)(b) by conducting or participating directly or indirectly in the unlawful criminal conduct that from 2007 up to this date is founded on fear for life, freedom, and economical survival. Through a intentional "pattern" of excessive racketeering violations as identified in the Hobbs act, the Defendants combined committed and for such

violations and willful acts they are indictable under 18 U.S.C. § 1961 (a)(b)(c)(d), and 18 U.S.C. §1951 (a)(b).

134. The Defendants numerous threats of serious adverse consequences such as the loss of freedom, deportation, threats of murder, threats of murder and safety related to the Plaintiffs loved ones, threats of driving the Plaintiff out of business, translated in many aspects into a real state, realized actual injury, in accordance to the Defendants issued threats. As to such conduct the Defendants are indictable and punishable under section § 2B3.1.

135. [E]ven if the threat does not itself imply violence, which in Plaintiffs case it did, the “possibility of violence or serious adverse consequences may be inferred from the circumstances of the threat and the reputation of the person making it.” The Defendants, the conspirators, the coconspirators unlawful acts , realized extensive orchestrated damages, and should therefore be punished/indicted in accordance to their violations’ of 18 U.S.C. §1961 (a)(b)(c) (d), and 18 U.S.C. § 1951 (a)(b) recognizing the two level increase as identified in section § 2B3.1, related to injuries exceeding 5,000,000, US dollar.

136. The Defendants applied, inflicted, caused and used fear the fearful state of Plaintiff and his loved ones for profit.

PRAYER FOR RELIEF

In reference to the above, the Plaintiff request that this court grant the following relief :

- A. Determine that this action is a proper class action and to certify Plaintiff as class for the class under Federal rule of Civil procedure.
- B. Finds that the Defendants have violated 18 U.S.C. §§ 1962 (c) and (d)
- C. Enjoin the Defendants from further violations of 18 U.S.C. §§ 1962 (c)(d)
- D. Finds that the Defendants are in violation of 18 U.S.C. 1951 (a)(b) and applying a two level increase as provided in section § 2B3.2(b) exceeding 5,000,000 US dollar.
- E. Finds that the Defendants are in direct violation of 18 U.S.C. §1961 (a)(b)(c)(d)
- F. Finds that the Defendants have intentionally and unlawfully violated the FDUTPA, are in direct violation of the Lanham Act § 43 (a)(1)(B) and that additionally the Defendants are liable for damages related to the Trade Secret Clarification Act TSCA and FEEPEA, they so extensively violated .
- G. Finds that the Defendants are in violation of 18 U.S.C. §1341,1343 and § 15 U.S.C. §§ 1111-27
- H. Finds that the Defendants engaged in a civil conspiracy to defraud the Plaintiff.
- I. Finds that the Defendants violated 17 U.S.C. § 501.106 for profit.

- J. Finds that the Defendants committed violations identified as 18 U.S.C. § 1956.
- K. Finds that the Defendants have been violating 18 U.S.C. § 1964, §§ 1961 (1)(a)(b)
- L. Finds that the Defendants committed Espionage and have violated 18 U.S.C. § 1030 (1)(2)(A)(C)(4)(5)(B)(C)(7)(B)(b) along with 18 U.S.C. 1831 (1)(2)(3)(4)(5)
- M. Finds that the Defendants are in direct violation of 18 U.S.C. § 1037 (1)(2)(5)
- N. Finds that the Defendants combined realized identity theft as to 18 U.S.C. § 1028 (2)(3)(7)(8)
- O. Finds that the Defendants dealt with stolen property and are in direct violation of 18 U.S.C. § 2314 and 2315.
- P. Finds that the Defendants are in direct violation of 18 U.S.C. § 1962 (a)(b)(c)(d).
- Q. Finds that the Defendants have been unjustly enriched and are liable to Plaintiff therefore;
- R. As to all counts, order the Defendants to pay damages in an amount to be determined at trial;

That this honorable court recognizes that Plaintiff has submitted this Class action against the Defendants on a Propria Persona foundation, wherein pleadings are considered without regard to technicalities. See Haines vs. Kerner 92 Sct. 594, also See Power 914 F2d. 1459 (11th. Cir. 1990. In Packet vs. Cox it was held that pro se pleadings require less stringent reading than one drafted by a lawyer. (456 F2d. 233 (1972 Sixth Circuit .USCA)

- S. Finds the Defendants to be liable for treble damages
- T. Finds that the Defendants unauthorized used copyright protected properties
Applied unauthorized usage, reproduction and distribution of such
properties' and violated Federal laws such as 15 U.S.C. §1114 (1) , and 18
U.S.C. § 2319, 19 U.S.C. § 1337.
- U. Order restitution of all improperly collected assets, charges, profits,
copyright protected material used for profit, injuries inflicted in the personal
and professional life of Plaintiff for profit , injuries related to the loss of
image and identity, damages caused due to the solicitation and sale of
forgeries, gains based on Plaintiffs investments used for profit that required
20 years to acquire, and loss of freedom, along with fear for life.
- V. Award Plaintiff the costs and disbursement of this action, including
reasonable attorney fees (including pursuant to FDUTPA, TSCA, FEEPEA
and the Lanham act.) and the reimbursement of expenses amounts to be
determined by the court.

DEMANDED IS TRIAL BY JURY

Plaintiff request a Jury Trial on any issue so trial able

Dated : _____

Respectfully submitted,

By : _____
Robert Preiss
Pro Se Attorney selection pending
11527 Casa Marina Way Suite 102
Tampa, Fl. 33635-6364

THE DEFENDANTS/PARTIES SERVICE

1. Masterpiece Publishing Inc. , 5 Watson, Irvine California 92618-2716
Phone: (949) 376 2644
2. Daniel Wynn, 5 Watson, Irvine California 92618-2716
3. Triad Art Group Publishing Inc. , 44 E. Belmont Dr., Romeoville IL. 60446
Phone: (815) 407 1801
4. Greg Bloch, 44 E. Belmont Dr., Romeoville IL. 60446
5. Global Village Champions Foundation Inc., 3430 Poinciana Ave., Miami
Florida 33133
6. Yank and Yvette Barry 1544 First Street, Sarasota Florida 34236
Phone: (941) 552 8485
7. Richard Clarvit PA., 1313 NE. 125th. Street, Ste. 200, Miami, Florida 33161-5975
Phone : (786) 276 7600
8. Robin Rile Fine Art Inc., 2780 SW., 33rd Ave., Miami Florida 33133
Phone: (813) 340 9629
9. Reed V. Horth, 2780 SW., 33rd Ave., Miami, Florida 33133
10. Intuortho Medical LLC., 95 Osprey Point Drive, Osprey Florida 34229
11. Zarasota Medical Products LLC., 95 Osprey Point Drive, Osprey Florida 34229
12. Ziegenfuss LLC., 95 Osprey Point Drive, Osprey Florida 34229
13. Robert and Lourdes Ziegenfuss, 95 Osprey Point Drive, Osprey Florida 34229
14. 88's Entertainment LLC., 19 N.E. 3rd Ave., Delray Beach, Florida 33444
15. James Layson,, 19 N.E. 3rd Ave., Delray Beach, Florida 33444
16. Stanley Warren address in the United Kingdom only known to Defendant Robert
Ziegenfuss and Reed V. Horth