

UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

*D.G. Sweigert, c/o
P.O. Box 152
Mesa, AZ 85211
Spoilation-notice@mailbox.org*

July 11, 2019

Jason Goodman, CEO
Multimedia Systems Design, Inc.
252 7th Avenue
Suite 6-S
New York, NY 10001

Clerk of the Court, Room 3000
U.S. District Court
701 E. Broad St.
Richmond, VA 23219

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL
District Judge M. Hannah Lauck

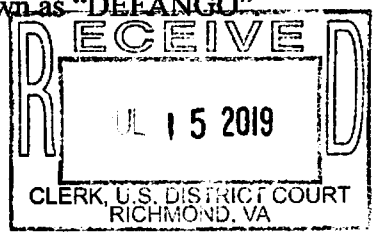
SUBJECT: PART ONE: ATTEMPTED FRAUD ON THE COURT BY
DEFENDANT GOODMAN VIA ECF DOC. NO. 139

REF: (a) ^EMANUAL CHAVEZ, III (DOB 03/21/1986), AZ DL DO1566834
_^

*D.S.
7/11/19*

Good Morning:

1. This letter addresses the false misrepresentations that you continue to present to this honorable Court based on insufficient tainted evidence that has been created with the cooperation of your CrowdSource The Truth (CSTT) side kick, see ref: (a), known as "DEFANGO"



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2. Your attention is kindly directed to ECF Doc. No. 139, para. 20, shown below.

24 key claims propagated by [REDACTED]
25 20. As previously submitted in these proceedings, (ECF No. 78 EXHIBIT I) Intervenor
26 Application D. George Sweigert, telephone Manuel Chavez III, making substantially the
27 same claim, falsely stating that Defendant Goodman was paid by Black Cube
28
DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 11

Case 3:17-cv-00601-MHL Document 139 Filed 07/08/19 Page 12 of 119 PageID# 2376

1 (<http://www.blackcube.com>) a private intelligence firm in the UK comprised of former
2 Mossad agents and operatives, according to their own public website.
3 21. On or around June 2019, Manuel Chavez III voluntarily shared some of his personal

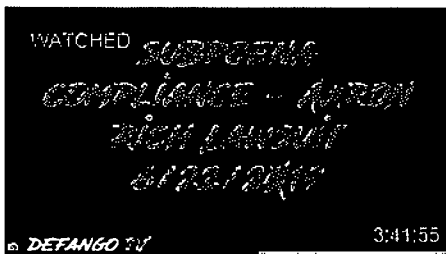
3. Please take note of the following litigation in which ref: (a) (DEFANGO) is a witness:

**U.S. District Court
for the District of Columbia
RICH v. BUTOWSKY et al
CASE #: 1:18-cv-00681-RJL
Judge Richard J. Leon**

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4. In recent YouTube video productions distributed by ref: (a) (DEFANGO) it has been clearly stated by ref: (a) that he was a member of a group of “reputation protection” operatives allegedly directed by Matt Couch (defendant in the above cited action). Ref: (a) has distributed in a widely pervasive manner, electronic messages from Matt Couch to support his testimony in the above cited litigation. Ref: (a) has also been vocal about evidence that he has furnished to you as well. See below:



subpoena compliance - Aaron Rich Lawsuit -
defango tv 6/22/2019

Defango TV
Streamed 1 week ago • 1,632 views

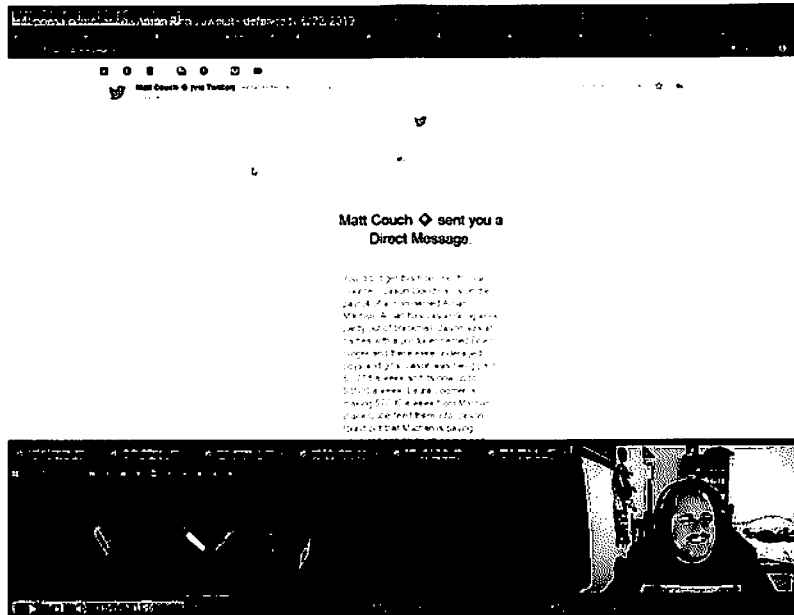
Well it's time do Comply with this Aaron Rich Lawsuit Subpoena. I think a few people are going to really dislike this stream but it's ...

Streamed live on Jun 22, 2019

Well it's time do Comply with this Aaron Rich Lawsuit Subpoena. I think a few people are going to really dislike this stream but it's for Court Records and whatnot. So we are getting everything on the table and building the files to FTP to the Lawyer. Any striking or anything is going to be interfering with a federal case.

Internet URL: <https://www.youtube.com/watch?v=pB7NjF1ApZg&t=7427s>

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Matt Couch sent you a Direct Message.

You didn't get this from me, from a Source Jason Goodman is on the payroll of a man named Arnan Michan Arnan has Jason doing work partly out of blackmail Jason was at parties with a producer named Brian Singer and there were underage boys and girls Jason was being paid \$2,788 a week and its now up to \$3500 a week Laura Loomer is making \$7000 a week from Michan Black Cube feed them info Jason found out that Michan is paying

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do not tell anyone how you got this info. Goodman's job is to deflect attention from Rahm Emanuel, Chuck Schumer and DWS. Rahm secretly paid Pakistani prosecutors 3 million in hush money in March 2009 to make a ton of fraud charges go away. The money came from Israel. The Awan's have been spying for Israel since 2007-2008 with Schumer as the king pin. Now Milchan works with a guy named Avi Hersh. I know you and T and others know some of this stuff, but now you know the full story. Also, Alan Dershowitz has over 7 hours of Orgy Island vid hidden and his vid file is called Insurance, the same name as Schumer's boy Anthony Wiener. Please keep my name out of this. I focus on Vegas and **Seth**. But this is blow away stuff. Goodman will freak when you expose this. It comes directly from a CIA guy on our team.

5. The enlarged video screen-shot from the above video content demonstrates that the source of the "Black Cube rumor" was apparently Matt Couch – and NOT the undersigned as you continuously report. As discussed in the previous letter on this subject, dated June 30th, 2019, you have implicated the undersigned as the source of the "Black Cube" rumor. To refresh your memory the rumor states that you and Laura Loomer were being paid by a Black Cube operative, stated by ref: (a) (DEFANGO) and NOT by the undersigned.

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6. As you can see by the above screen-shot evidence, Matt Couch was the source of this “Black Cube” rumor. This rumor was distributed by ref: (a) (DEFANGO) on his own volition. The undersigned has nothing to do with the promulgation of this “Black Cube” rumor. The reverse is true, the entire matter was the sole responsibility of ref: (a), who is your CSTT sidekick. Your insinuations in ECF Doc. No. 139, para. 20 that the undersigned promulgated this rumor are false and an example of your unrelenting fraud.

7. Recall that the offending “Black Cube” rumor remarks were made by ref: (a), reported by you in EXHIBIT I (no. 9 in ECF) of ECF Doc. No. 78, which is cited by you in para. 30 of ECF Doc. No. 139 (see video entitled *11.25.17.Solving.rar*). These remarks were NOT made by the undersigned.



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11.25.17.Solving.rar

Defango TV

Streamed 1 year ago • 3,880 views

Long day of puzzling and work Read More @steemit ...

Streamed live on Nov 25, 2017
Long day of puzzling and work

Internet URL: <https://www.youtube.com/watch?v=jK73oCxCGOE&t=4363s>

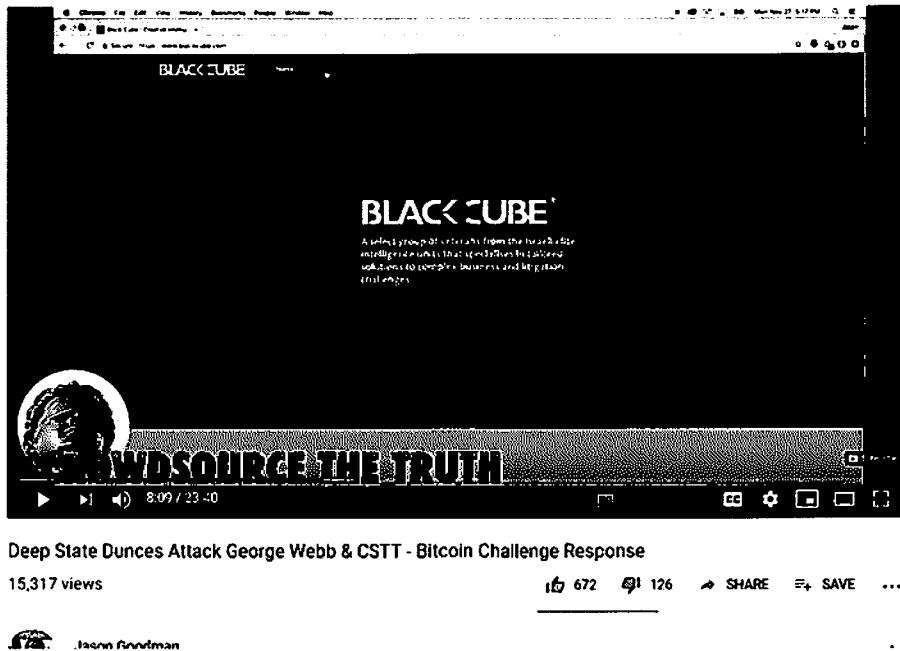
8. Ref: (a) (DEFANGO) promulgates the *Black Cube rumor* as seen in the video that appears ~~below~~. **ABOVE**

DS
7-11-19

REF: (A). 01.12.22. It's really crazy to me too .. I was picking up on something .. uh .. **Black Cube**. And, like I had gotten some information about . like .. some information from quote unquote "CIA source" that was talking about how Loomer and – what's his name – **Goodman were getting paid by some Black Cube, some Black Cube operative**. And then it started clicking in my head.
[emphasis added]

9. It is instructive to note that you specifically featured the Black Cube corporate web-site in your video production distributed in a widely pervasive manner two (2) days after these *Black Cube rumor* remarks were made public by ref: (a) on 11/25/2017 (see below).

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Deep State Dunces Attack George Webb & CSTT
- Bitcoin Challenge Response

Jason Goodman

Streamed 1 year ago • 15,315 views

The dumbest affiliates of the Deep State simply will not give up their
ludicrous attacks on the truth, while simultaneously offering ...

Streamed live on Nov 27, 2017

The dumbest affiliates of the Deep State simply will not give up their ludicrous attacks on the truth, while simultaneously offering no evidence to support their claims.

Internet URL: <https://www.youtube.com/watch?v=GNxCk6nqFJg>

10. Below is a transcript of your comments as recorded in the above cited video.

GOODMAN. 07:57. They'll put out a video that where they'll say 'oh yeah, Jason Goodman is working for **Black Cube**. Now I will tell you something. I had no idea what Black Cube was, before these guys made a video about it.

[emphasis added]

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11. Your CSTT side-kick DEFANGO (ref: (a)) is the sole purveyor of this *Black Cube rumor* – NOT the undersigned. This point is amplified in the STEEMIT post created during the time period in question by ref: (a) (DEFANGO) (see below).

Black CUBE Jason Goodman



defango (64) · in news · 2 years ago

Jason Goodman, you want to play old west gunslinger with peoples reputations? Been building a case on you since you asked me to look you up. , and your connections to child pedophiles, and Mossad.

CIA SOURCE: Deep Throat confirmed by @frankbacon

Jason Goodman is on the payroll of a man named Arnan Milchan. Arnan has Jason doing work partly out of blackmail. Jason was at parties with a producer named Brian Singer and there were underaged boys and girls. Jason was being paid \$2.788 a week and its now up to \$3500 a week. Laura Loomer is making \$7000 a week from Milchan. Black Cube feed them info. Jason found out that Milchan is paying Loomer twice as much as him and thats why they had this fight. Please do not tell anyone how you got this info. Goodman's job is to deflect attention from Rahm Emanuel , Chuck Schumer and DWS. Rahm secretly paid Pakistani prosecutors 3 million in hush money in March 2009 to make a ton of fraud charges go away. The money came from Israel. The Awan's have been spying for Israel since 2007-2008 with Schumer as the king pin. Now Milchan works with a guy named Avi Hersh. I know you and T and others know some of this stuff, but now you know the full story. Also, Alan Dershowitz has over 7 hours of Orny Island

Internet URL: <https://steemit.com/news/@defango/black-cube-jason-goodman>

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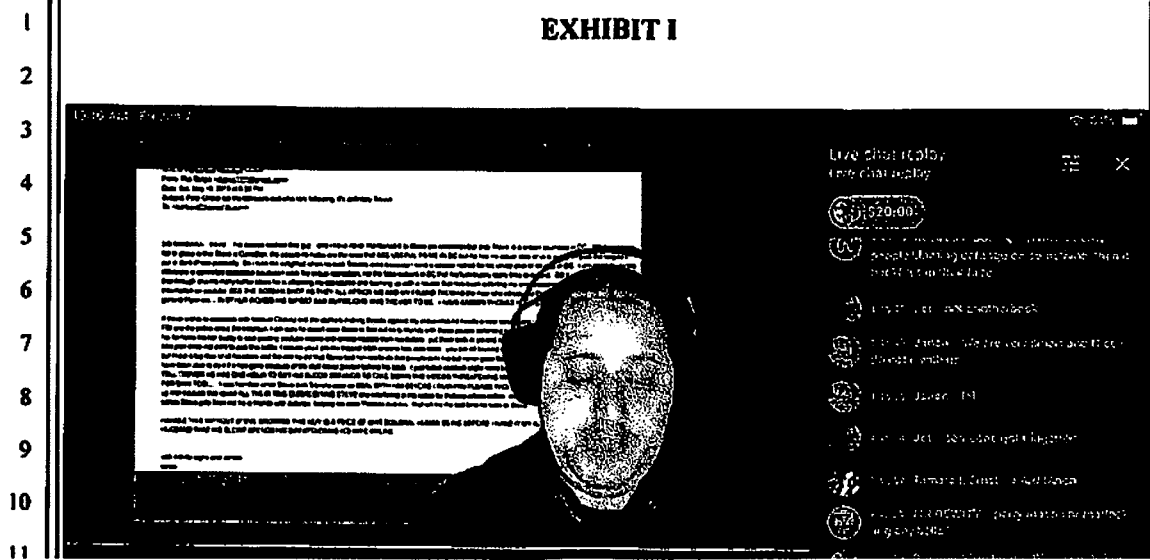
12. Your attention is directed to para. 32 of ECF Doc. No. 139 (shown below).

1 32. Chavez is an associate of Intervenor Applicant and has been paid by Intervenor Applicant
 2 and has received direct instructions from Intervenor Applicant. Intervenor Applicant
 3 operates a YouTube channel under the account name "Prepper Kitty Intel PKI". Many
 4 exhibits in this instant legal matter have referenced this YouTube account. YouTube
 5 username Prepper Kitty Intel has paid Chavez via YouTube Superchat (EXHIBIT I)
 6

13. Show below is EXHIBIT I, that is attached to ECF Doc. No. 139.

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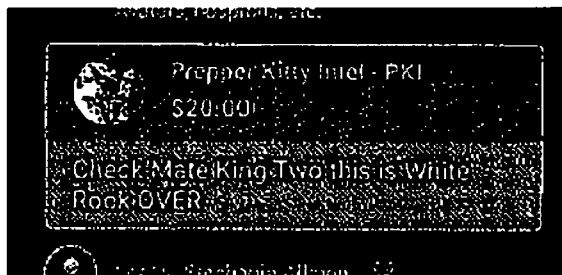
EXHIBIT I



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14. **EXHIBIT I** (ECF Doc. No. 139) is a screen shot of an apparent DEFANGO TV YouTube podcast (see above). The “super-chat” portion of the video screen shot appears below.



15. According to your pleading, you want this Court to believe that the alleged illustrated \$20.00 “super chat” donation to DEFANGO TV (displayed in the unauthenticated exhibit – see above), with the text “Check Mate King Two this is White Rook OVER”, provides evidence that “Chavez is an associate..”[of undersigned] and “Prepper Kitty Intel has paid Chavez...”. [\$20.00].

16. At the outset, there is no Internet URL Internet address provided in **EXHIBIT I**, ECF Doc. No. 139. By NOT providing the correct evidentiary basis for this “exhibit” (which has been explained to you via letters in this litigation and other litigation) this exhibit is moot.

17. There are other issues associated with your ECF Doc. No. 139, para. 20 (see above). There are legal insufficiencies associated with your “evidence”, for example: (i) whether or not the purported *evidence* you propound rises to the level of sufficiency in the light of the Federal Rules of Evidence (F.R.E.), and (ii) your use of hearsay and guilt by association in an attempt to attribute *Black Cube rumor* comments to the undersigned and NOT to ref: (a) (DEFANGO) (as broadcast in the video you have described as **EXHIBIT I**, to ECF Doc. No. 78). This is a falsehood and an attempt to mislead the Court.

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18. In sum, you expect the Court to believe that an alleged public “super-chat” donation of a \$20.00 donation to ref: (a) (DEFANGO) 30-45 days ago is the equivalent of the alleged private (non-public) \$1,500.00 PATREON donation made by “AMABISS” to ref: (a) (DEFANGO) purportedly made 18 months ago. You have misrepresented these facts to the Court to Y promote the fallacy that the undersigned is working with members of the DEFANGO conspiracy.

19. Caveat: for your information “**Check Mate King Two this is White Rook OVER**” (which appears in the above illustrate “super-chat” text) is a comical reference to the radio call signs used in the 1960’s World War II drama television series “COMBAT” starring Rick Jason and Vic Morrow. Below is an example of the television show.



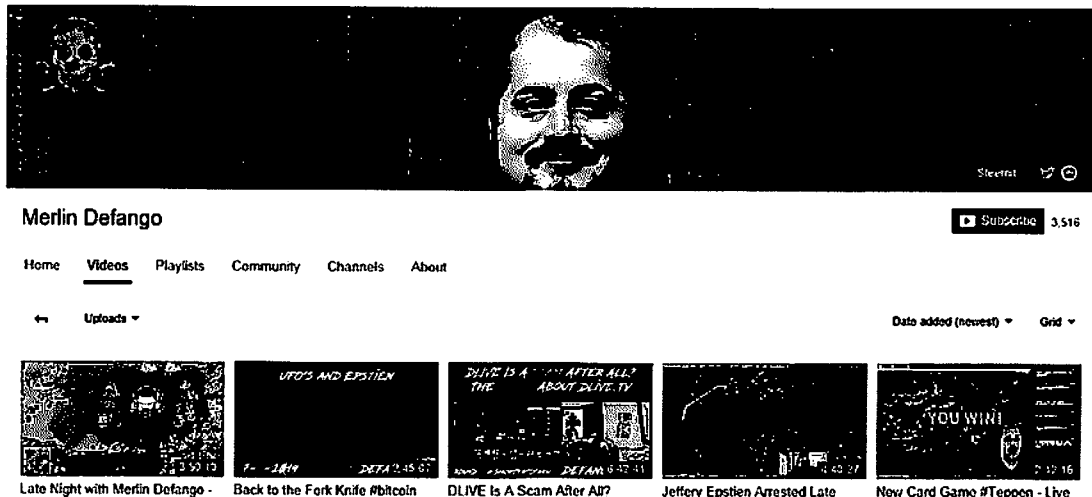
COMBAT! s.1 ep.3: "Lost Sheep, Lost Shepherd" (1962)

Internet URL: <https://www.youtube.com/watch?v=r35lw9CWk-g&t=24s>

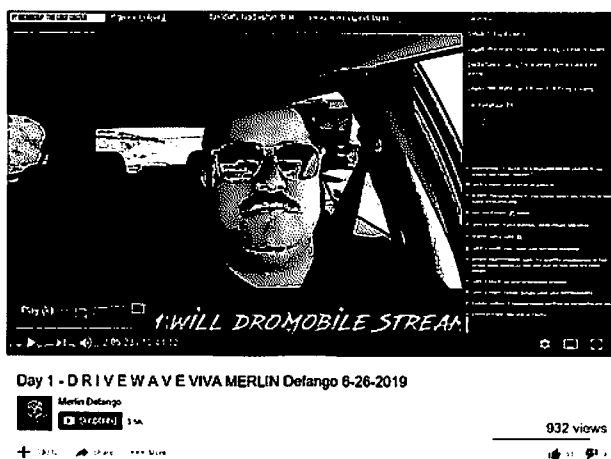
20. Your attention is directed to the following YouTube channel named “MERLIN DEFANGO”, which is maintained by ref: (a) (see below).

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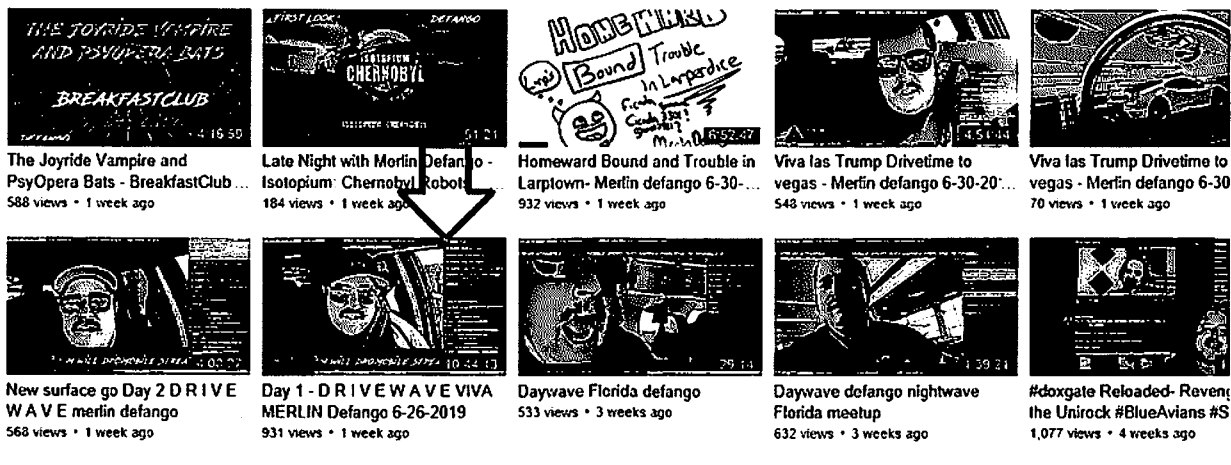
21. As you are well aware, you placed a telephone call to ref: (a) (DEFANGO) while he was conducting a livestream YouTube broadcast (similar to your use of livestream technology during the closure of the Port of Charleston on June 14, 2017). Your conversation you're your CSTT side-kick is available within the YouTube video content (see below) posted by ref: (a) (DEFANGO).



Streamed live on Jun 26, 2019
VAPORTUBE. WERE ya Been defango????

Internet URL: <https://www.youtube.com/watch?v=11dhF6m1-9g&t=7523s>

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22. Your conversation commences at time-mark 42:35 and is as follows (excerpts):

TRANSCRIPT OF DISCUSSION

REF: (A): Oh, Jason Goodman is calling me. Hello Jason Goodman.

GOODMAN: Manual Chavez, how are you.

REF: (A): I am doing alright, just heading to Arizona right now.

GOODMAN: OH, ok. So I guess you are in a bit of a drive. I don't know if you had a chance to see my messages, but one thing I would really like to get – if your able to send it – is either a screen capture from Patreon of . uh .. the dash board, or the initial e-mail Patreon that sends you that says AMABISS has become a Patreon and shows an e-mail of that account.

...

REF: (A): I can send that over to you no problem, actually. Garble. I actually did get that e-mail . and .. all .. uh .. and I have a couple of messages for how ever many months she was on my thing and I will send you like a copy of that it shows the date and what e-mail she was using.

....

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GOODMAN: Something you would write to the Bar Association saying “hey, look, this judge determined that it is likely that Biss is making these inappropriate payments. He is not supposed to be paying you, if you’re his client, and particularly if that payment is coming at a time you are engaged in activities like making videos about his lawsuit, that spread allegations out across the Internet, that aren’t true. Things like that. So, that is my position that he had someone paying you to do that stuff. **He’s been working with Robert David Steele, you were working for Robert David Steele, at the time, Sweigert [undersigned] was working with you, Tyroan Simpson was working with you and Sweigert and these are the elements of conspiracy.**

REF: (A): Yeah, I mean you got the conspiracy down pretty well. I mean. I will send you everything that shows she was on my Patreon and she was paying me on Patreon, for sure. **But, was I working in concert with Dave Acton [undersigned] and those guys, yeah, f_ck it, why not. I will say whatever. (Laughter)**
[emphasis added]

SUMMARY

23. It appears that you have intentionally conflated the undersigned with ref: (a) (DEFANGO) in a fraudulent manner to support the *Black Cube rumor* narrative. Overwhelming evidence indicates that this rumor is directly and solely traceable to ref: (a) (DEFANGO) and NOT the undersigned. Nonetheless, you continually ask this Court to believe in this falsified narrative based on flimsy tainted and unauthenticated evidence, which you present in a glossed over manner.

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24. It appears that you have intentionally conflated the undersigned with ref: (a) (DEFANGO) in a fraudulent manner to support the *Black Cube rumor* narrative. Overwhelming evidence indicates that this rumor is directly and solely traceable to ref: (a) (DEFANGO) and NOT the undersigned. Nonetheless, you continually ask this Court to believe in this falsified narrative based on the most flimsy tainted and unauthenticated evidence, which you present in a glossed over manner to the Court.

25. It appears from the foregoing that your issues should be with your CSTT side-kick ref: (a) (DEFANGO) and not me. Your continued accusations regarding the undersigned's involvement in a conspiracy with DEFANGO (ref: (a)) appear to be fraudulent on their face.

I hereby attest that the foregoing is true and accurate under the penalties of perjury on this 11
day of July, 2019.



D. G. SWEIGERT

7.11.19

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
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ROBERT DAVID STEELE,

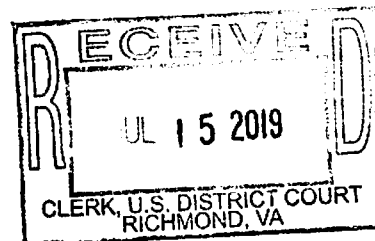
Plaintiff,

-against-

JASON GOODMAN,

Defendant.

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CERTIFICATE OF SERVICE

It is hereby certified that the accompanying materials have been placed in the U.S. Postal Service with First Class mail postage affixed and addressed to the following parties:

**Clerk of the Court
U.S. District Court
701 E. Broad St.
Richmond, VA 23219**

**Jason Goodman
252 7th Avenue
Suite 6-S
New York, NY 10001**

**Susan A. Holmes
(Lutzke)
2608 Leisure Drive
Apt. B
Ft. Collins, CO 80525**

I hereby attest that the foregoing is true and accurate under the penalties of perjury on this 11 day of July, 2019.

D. Sweigert

**D. GEORGE SWEIGERT, C/O
P.O. BOX 152
MESA, AZ 85211**

7.11.19