

U.S. DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

D George Sweigert, <u>Plaintiff</u> v. Jason Goodman, <u>Defendant</u>	CIVIL CASE #: 1:18-CV-08653-VEC JUDGE VALERIE E. CAPRONI
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**PLAINTIFF'S LETTER MOTION FOR LEAVE OF COURT TO ADD KERRY WOLF
AS A DEFENDANT**

MAY IT PLEASE THE COURT:

1. KERRY WOLF, a 40 something female, is a prolific video content creator that has close relationships with several key “co-conspirators” described by Defendant (Def.) Goodman in his “Virginia lawsuit conspiracy”. Kerry Wolf, known in social media circles as “ALL SEEING EWE”, has recently aligned herself with putative defendant **Marcus Conte** to produce and distribute deplorable video content that focuses a smear campaign on only three parties: undersigned (“Dave Sweigert”), Thomas Schoenberger (non-party accused by Def. Goodman as the leader of the defamation conspiracy directed at him) and Dan Cromer (non-party never mentioned in Court pleadings until now). This is a tortious continuation of the joint Conte/Goodman smear campaign against the undersigned.

2. As shown in **Exhibit One**, only three (3) men (Sweigert-Schoenberger-Cromer) are the subject of videos distributed on a YouTube channel known as “DOPEY DAVE”. The videos create storylines of murder, double homicides, arson, terrorism, gang rape, etc. The videos accuse each person (individually and collectively) of murder, extortion, blackmail, etc. For example, video titles include: “Dave Sweigert, Thomas Schoenberger & Daniel Comer Caught Running An Extortion Ring”, “Crazy Dave Sweigert Tries One Last Time To Stalk Someone”, etc. [**Exh. One**].

3. As shown in **Exhibit Two**, the undersigned is accused as follows, “[h]e (undersigned) tries one last time to serve a fake lawsuit” and “Crazy Dave Sweigert Refused to stop violating people”. The video is presented in a “combat footage” style that shows a dog attacking the undersigned and someone beating the victim (identified as the undersigned in the video) as he lays on the ground with the dog tearing at his clothes. **As Exhibit Two** shows (third frame) the video proclaims, “[e]ven as the dog ripped his flesh Sweigert screams, “I’m gonna sue” “I’m gonna sue”. Thus, the content is directly related to this present lawsuit and the potential adding of putative defendant Marcus Conte.

4. The dozens of “DOPEY DAVE” videos follow the same familiar pattern of social media messaging pushed by both Def. Goodman and putative Def. Conte: that Sweigert – Schoenberger

– Cromer are working together, are partners, are part of a criminal-level extortion and blackmail ring, they cyber-stalk innocents, are members of a gang, etc. There are unmistakable qualities of the videos that place Kerry Wolf as the content creator, to include the allegations that the undersigned and Schoenberger are Satanists, see **Exhibit Three**.

5. Prior to June 2017 the undersigned was an anonymous video content creator of videos primarily related to survival skills and emergency medical technician (EMT) training videos (Plaintiff has been a licensed Emergency Medical Technician in California for eight years). In June 2017 (immediately prior to the Port of Charleston, S.C. “dirty bomb hoax” of 6/14/2017) the social media celebrity known as “NATHAN STOLPMAN”, aka “LIFT THE VEIL”, drew attention to the Plaintiff and stated his contention that George Webb Sweigert, known as “GEORGE WEBB” on social media, was directly connected to the undersigned (which was not public knowledge at the time). Both Stolpman and Webb have been accused by the Def. Goodman (in court documents and in a dozen video podcasts) of being a part of the civil conspiracy to defame him.

6. **Exhibit Four** is video content of a joint Def. Goodman on the Nathan Stolpman video podcast discussing investigations that Goodman had launched against the undersigned with the Federal Bureau of Investigation, New York Field Office (FBI/NYFO). See video entitled, “Jason Goodman Calls Lift the Veil”. [Exh. 4] The video content (**Exh.4**) was broadcast on the *Lift the Veil* and *Jason Goodman* channels (simulcast) on April 8, 2018 – the same time as Def. Goodman threatened to initiate an FBI/NYFO investigation against the Plaintiff. In this video Mr. Stolpman accuses the undersigned of leading a cyber harassment campaign against him, which Goodman uses as confirmation that the undersigned is a criminal.

7. Shortly after the undersigned’s real name was broadcast by Nathan Stolpman (June 2017), the Plaintiff was approached by Mr. Stolpman’s “administrative assistant” Kerry Wolf to assist in the drafting of a letter to the Sheriff’s Office (SO) of San Luis Obispo (SLO), California, where Stolpman lived with his father. Kerry Wolf openly admitted that she was the administrative assistant for Mr. Stolpman, (**Exhibit Five**) and forwarded a letter to the SLO Sheriff’s Office to amplify and corroborate a letter sent to the SLO/SO by the Plaintiff about Mr. Stolpman’s activities (**Exhibit Six**). Plaintiff/Wolf allegations to the SLO/SO were that it was Mr. Stolpman that was operating a cyber-stalking, defamation, libel and smear campaign almost identical to the allegations proffered by Goodman in his “Virginia lawsuit conspiracy”. Attached to the **Exhibit Six** letter was the attachment of Kerry Wolf’s document filed in a Temporary Restraining Order (TRO) hearing in a matter of Mr. Stolpman attempting to obtain a TRO against Kerry Wolf (aka All Seeing Ewe).

8. These communications construct a clear and unmistakably pattern and practice of slander, defamation, libel and fraud that is identical to the current misconduct exhibited in the “DOPEY

DAVE” videos attacking Sweigert – Schoenberger – Cromer and in the social media messaging pushed by both putative defendant Conte and **Def. Goodman**. To refresh the Court’s memory; **Nathan Stolpman and Thomas Schoenberger** have been alleged to be members of the “Virginia lawsuit conspiracy” that is directing a defamation campaign against Def. Goodman.

9. Kerry Wolf acted as **Dan Cromer’s** sidekick, chat room moderator and video production assistant on Cromer’s social media podcasts known as “TEENAGE FBI LIVE” and “VAPOR BAT RECORDS” in the **June to October 2019** time window. During this time period the Plaintiff had a telephone call with Ms. Wolf in which she requested financial assistance or to be hired by the Plaintiff as a video production assistant to make video productions on his behalf. The Plaintiff declined the offer. During this phone conversation Ms. Wolf admitted to a relationship (of unknown origin) with Thomas Schoenberger who she had received money from. During this phone conversation she expressed her disgust of Mr. Schoenberger as he cut off payments.

10. The unifying linkage of the “DOPEY DAVE” smear campaign videos that attack Sweigert – Schoenberger – Cromer is Kerry Wolf. Kerry Wolf (aka All Seeing Ewe) has now joined forces with Marcus Conte as his *alter ego* to carry on the attacks against the perceived enemies of Conte and Goodman. The defamation, slander and libel pattern of practice and video content messaging by putative defendant Conte is identical to the messaging video content in the “DOPEY DAVE” series; as described in ECF Doc. Nos 132 and 133.

11. **SUMMARY.** Kerry Wolf exchanged several e-mails with the undersigned about Mr. Stolpman in the summer of 2017 outline her attempts at smearing Mr. Stolpman. Presently, Kerry Wolf has requested monies from the Plaintiff and has left, disassociated herself, and/or quit her participation on the Dan Cromer video productions. Kerry Wolf is connected to all three men – Sweigert – Schoenberger – Cromer, the same three that putative defendant Marcus Conte has attempted to “shoe horn” and force into the Virginia lawsuit conspiracy pushed by Def. Goodman.

12. **AFFIRMATIVE RELIEF REQUESTED.** Plaintiff hereby requests the LEAVE OF THIS COURT to file documents of the exact same nature of ECF Doc. Nos 132 and 133 to ADD KERRY WOLF as a defendant in this lawsuit.

I hereby certify that the attached pleadings are truthful and accurate (to the best of my knowledge) and are not submitted for the purposes of oppression of the Defendant. Signed this 30th day of December 2019.

**D. G. SWEIGERT, C/O
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