

**IN THE SUPERIOR COURT OF HENRY COUNTY
STATE OF GEORGIA**

Sandra Gail Motley,
On behalf of
Douglas Jordan Grant,
Harrison Frank Grant, and
Olivia Monet Grant,
Plaintiffs,

v.

Carey Seymour Grant,
Defendant

Civil Action File No. _____

COMPLAINT FOR INJUNCTIVE RELIEF, DAMAGES, AND OTHER RELIEF

I. NATURE AND PURPOSE OF THIS ACTION

1. Plaintiffs, proceeding pro se, submit this Complaint against Defendant Carey Seymour Grant and state as follows. Plaintiffs seek civil relief arising from a continuing course of conduct that Plaintiffs contend has included stalking, harassment, threats, intimidation, property damage, burglaries, theft of business and technology materials, interference with housing and business activities, and other conduct directed at Plaintiffs and their family.
2. Plaintiffs do not ask this Court to determine criminal guilt. Plaintiffs seek civil remedies for the underlying conduct and injuries described herein, including appropriate injunctive relief, compensatory and special damages, punitive damages where legally available, costs, and such other relief as the Court may lawfully grant.
3. Plaintiffs have reported various incidents to law enforcement, military, governmental, medical, utility, housing, and other authorities at different times and different locations. Where an incident is supported by a police report, court record, medical record, photograph, communication, or other contemporaneous record, Plaintiffs intend to identify that evidence separately.
4. Plaintiffs are presently unable to identify every person who may have participated in, assisted with, encouraged, benefited from, or possessed knowledge of particular acts. Plaintiffs therefore plead the facts presently known and reserve the right to amend as discovery identifies additional responsible persons or clarifies the circumstances.

II. PARTIES

5. Plaintiff Sandra Gail Motley, the ex-wife of the defendant, is a resident of Arlington County, residing at 1111 Arlington Boulevard #532, Arlington, Virginia 22209, and is the parent of the children who were minors ages 9, 13, and 16 years old respectively, when the events described in the complaint began. She brings her individual claims arising from the conduct described herein.
6. Plaintiff Olivia Monet Grant is an adult and the child of the defendant. She is a resident of Henry County, Georgia. She was 9 years old when the events began and is listed as a Plaintiff.
7. Plaintiff Harrison Frank Grant is an adult and the child of the defendant. He is a resident of Arlington County, Virginia. He was 13 years old when the events began and is listed as a Plaintiff.
8. Plaintiff Douglas Jordan Grant is an adult and the child of the defendant. He is a resident of Henry County, Georgia. He was 16 years old when the events began and is listed as a Plaintiff.
9. Defendant Carey Seymour Grant, U.S. Army Retired (E-9) is a resident of Henry County, and resides at 220 Lassiter Drive, Ellenwood, Georgia 30294.

III. JURISDICTION AND VENUE

10. This Court has subject-matter jurisdiction over the civil claims asserted in this Complaint to the extent provided by the Constitution and laws of the State of Georgia.

11. Plaintiffs allege venue in Henry County because Defendant resides or maintains the residence identified above in Henry County and because Plaintiffs contend that relevant conduct, or property interests are connected to this venue although the continuing effects occurred in other cities and states.

12. Plaintiffs request that Defendant be served at his place of residence or last known employer, The VA Hospital, 2400 Hospital Road, Tuskegee, Alabama 36083 (Macon County), in accordance with Georgia law and the procedures of the Court. Venue is proper in this Court pursuant to O.C.G.A. § 9-10-30 because the events giving rise to this complaint originated within metropolitan Atlanta of which includes Henry County where the defendant is domiciled.

IV. STATEMENT OF FACTS

13. The plaintiffs and defendant are members of the same family. Beginning on or around 2008 during and around the divorce-related litigation process between the plaintiff and the defendant that continues to the present. The Defendant has engaged in a pattern of behavior intended to harass, intimidate, and threaten Plaintiff and her minor children and or is/was aware of persons or persons who were. When the events began, plaintiffs Olivia, Harrison, and Douglas were minors, approximately nine, thirteen, and sixteen years old, respectively.

14. During that period, Sandra alleges that she and her children began experiencing harassment, stalking, and death-related threats by individuals and or through an organized mafia-styled crime ring under the name Luminati. The events were orchestrated independently and in groups.

15. Prior to the divorce, Sandra nor her children experienced any threats, harassment, stalking, acts of terrorism, concerns with the LGBT community, nor any interactions with law enforcement, with one exception. In 2001/2002 a 911 call to her home in Georgia, after she demanded the defendant leave the home after an incident. The defendant was on the phone with another woman making plans with her while the plaintiff and children were asleep. The plaintiff got up and heard the defendant on the phone with another woman in the middle of the night, as he had done before.

16. The plaintiff had asked for a divorce, the defendant threatened to “kill” her if they divorced, to protect his military retirement. The defendant was a master manipulator. Sandra and the defendant separated. The defendant made attempts to reconcile with her, claiming the accusations made by her daughter, his stepdaughter were untrue. She discovered a Washington DC phone number. She called the woman and spoke with her on the phone. She informed Sandra that she had visited the defendant in Georgia and described his apartment. She told Sandra that the defendant told her that our son Harrison was not his child. That I had gotten pregnant while I was cheating on him and other lies, while crying.

17. When the plaintiff met the defendant, he told her a similar story that he was a good man and his wife had cheated on him with his best friend. He used it as a warning to keep our marriage and details of it private because of jealous friends and family. The defendant’s marriage to the plaintiff was his second marriage.

18. The plaintiff and defendant were married for 7 years prior to having children together.

19. Since the plaintiffs had “never” experienced threats, violence, nor interactions with law enforcement, she believes that the events that she and children began experiencing were directly related to the defendant’s anger with the failure of his second marriage.

20. At the time of the divorce proceedings, the plaintiff was busy preparing for her future ambitions of starting a business and began dating. The children were excelling in school. The defendant used to express his pride in how his children were raised. Since, efforts were being made to portray the children and Sandra as dysfunctional and have continued since.

21. The plaintiff requested a divorce from the defendant after discovering he was going to deploy to Korea. He refused again with the threat to destroy her. The plaintiff then sought the assistance of the defendant’s military superiors who met with her and the defendant.

22. The Command Sergeant Major instructed the defendant to either “grant” the plaintiff the divorce or a legal separation prior to deploying overseas. The defendant agreed. Two or three weeks later, the plaintiff discovered that the defendant signed out of base and left for Korea, disobeying his superior’s order.
23. The plaintiff sought the assistance of JAG’s military attorneys who informed her that “she” could not divorce the defendant while he was stationed in another country under the Soldiers and Sailors Act. They stated that if the defendant wanted the divorce, he could initiate it while overseas but she could not and would have to wait until he returned to the United States. The defendant remained overseas for several years, refusing a divorce.
24. The plaintiff “stopped paying the bills” to force the defendant to file the divorce upon his return. After returning to the United States from Korea, the defendant filed for the divorce.
25. The family’s earlier Fulton County Superior Court matter, Civil Action File No. 2008CV159814, provides contemporaneous documentation of prior family litigation and written notice directly in the complaint stating the harassment, threats, and claimed physical and psychological harm involving the minor children.
26. In 2010, the plaintiff began receiving “luminati/mafia” threats in Georgia and other states including Danville, Virginia.
27. The threats included the plan to set up and frame all of the plaintiffs. The premeditated plans were to make them criminals, drug addicts, alcoholics, homosexuals, whorers, prostitutes, uneducated, and place them all in jail/prison or a mental institute for life.
28. As of September 2026, Sandra’s children Douglas, Olivia, Harrison, and eldest daughter Bischellya have experienced anxiety, depression, and are taking some form of medication, and or are in therapy. **The medical related illnesses are directly correlated to the sustained attacks over the 16 years, or over 5, 840 THOUSAND consecutive days of terrorism.**
29. After the terrorism continued, the plaintiff planned one year in advance to move out of the state of Georgia to protect her 2 minor children (Harrison and Olivia) after her eldest son Douglas went to college at the University of West Georgia where he was accepted as a freshman, and after she achieved her 10 year tenure at Georgia Tech in August 2010.
30. As planned, the plaintiff and her kids moved out of Georgia to North Carolina in July 2010. The plaintiff used her 30 day leave to meet the August 10 year tenure. Prior to leaving, homosexuals began to appear, trail, and harass Harrison with and without Sandra.
31. Sandra would accompany Harrison to the basketball court and sit in her car for hours while he played with his friends. He would often look over to ensure I was still waiting for him, as long as I didn’t embarrass him in front of his friends.
32. Harrison had an incident where men with “fishhooks” appeared and he got nervous and started sweating. Later, to threaten him “not to go to college”, Sandra took him to take his college placement exams. As they left the university parking lot, an HIV truck pulled up behind her vehicle and trailed her onto I20 interstate. Harrison laid down in the back seat. Later, homosexual men appeared on public transportation to threaten him from public travel.
33. In North Carolina, Harrison and Olivia continued to thrive in school and both continued to pursue their interest in music. Harrison joined the band. Harrison was interviewed and accepted into a dual enrollment program where he would have graduated with both a high school diploma and an associates degree. Douglas decided to join the military in satellite communications.
34. After joining the band, a homosexual paraprop was hired to work directly with the students. I went to the school and made certain that the band staff did not have my permission to transport Harrison to or from band events and or home. I felt uncomfortable with this continuation of homosexuals who had begun to appear in our lives and the threats to make my son gay by Illuminati.

35. Sandra also went to the school to complain again as the season changed. The practices and performances ended after dark and the lighting was inadequate for their safety. After one band event, the buses returned later than usual. I drove to pick up Harrison at the school and discovered the teachers brought him home, with the homosexual I assumed. I returned to the school again and warned that “no teacher or parapro” had my consent to transport my son home.

36. The teachers complemented Harrison’s academic achievements. It was consistent with his honor roll, principle’s list for academic achievement, and above average annual test scores, similar to his brother Douglas.

37. Although Harrison was accepted into a dual enrollment program where he would have graduated with both a high school diploma and an associates degree, he was being harassed. He begged Sandra to return to Georgia to be near their friends and promised to continue to excel.

38. Olivia had excelled in Georgia and was a member of the Executive Committee for the Honor Society. In North Carolina, she was accepted into a conditional “Talented and Gifted” program. In Georgia, her teachers recommended Olivia for leadership camps two consecutive years in Washington DC. There she also pursued her interest in Violin.

39. In North Carolina, her confidence continued to grow. She auditioned to perform the keyboard in front of her elementary school’s student body, just after weeks of learning how to play it. As she took the stage, she confidently played for the audience and socialized with her friends while Sandra sat and waited for them.

40. Concerned with being in the company of students at a PTA meeting and student talent show, Sandra approached the female principal of Colfax Elementary School. As she was leaving the building with her husband and children, she asked to speak to her privately and instructed her family to go into the building.

41. Sandra told her the story of the harassment, threats, and use of students to frame her and the kids. That the potential source of events was being executed by her ex-husband and friends who sought revenge. She explained to the principal that the reason for the attacks was because she disclosed the child molestation accusations made by her eldest daughter Bischellya. Sandra informed the principal that she did not manufacture the story and that Carey was aware that her daughter did. She further explained that once her daughter (his stepdaughter) confessed, she spoke with Carey on the phone, while stationed in Korea to question him about the allegations. At the time, Sandra was skeptical about the story because Bischellya and Carey were very close. Bischellya told me later that she told the military.

42. After Bischellya told Sandra that she was molested a year later, while Carey was still in Korea, she believed her. Sandra sought support through friends who were stationed with her in Hawaii who suggested she seek therapy because I couldn’t stop crying. I informed my family in Danville and other friends. I coordinated therapy through DEERS/TriCare to cope with my grief.

43. I began to question an incident in which I came home from work and Carey was in my daughter Bischellya’s room, she was not at home. When I reached the stairs and took a couple of steps, Carey ran out of her bedroom, he was crying. He never explained to me why. When she returned, she didn’t appear overwrought with emotions. She behaved normally, so I assumed “more Carey drama.” Then, I began to wonder about the anonymous letters Bischellya showed me and some other details that I ignored because I was so fed up with Carey. I felt guilty because I didn’t protect her. That experience has caused me to respond and take action if I have suspicions about my children’s safety, report incidents, file police reports, request investigations, and apologize later.

44. In 2013, during a mental health court in Danville, VA, a female judge asked if anyone in the family had experienced sexual abuse, Bischellya raised her hand much to my surprise and the rest of the family. I was told that Carey sent messages that he was going to drive to Danville to pick up Olivia and Harrison. Bischellya dared him to come and he didn’t. My sister Betty falsified a police report that I was suicidal, would kill my children, and was a threat to society. The Danville Police told me that they didn’t believe it and provided their “personal” cellphone if she made any further claims.

45. Our mother died on the morning of my 11th birthday from an alcohol related accident. She had struggled with alcoholism as well as my father. As the youngest and because she died on my birthday I think, I had family wide support. I went to live with one of my teachers for a while to help me get through the grief. She and my other siblings had to stay home and continue to deal with the pain. She began drinking, rebelling in school, running away from home and was placed in foster homes. She had threatened to kill my stepsisters and I, and later became a drug

addict for 25+ years. I had provided financial support to her and my siblings while serving in the military and afterwards, she would attack me in the past and say things about my kids, because she thought I thought that I was better than her. She was sober for many, many years and recently relapsed into smoking crack cocaine again in early 2026. She continues to apologize for the incidents.

46. I had never had thoughts of suicide before this incident or since. I never threatened to kill my children, and have never owned any weapons, and primarily is very diplomatic, preferring to discuss differences as opposed to physical fighting. I fiercely protect my kids.

47. While Sandra resided in Arlington, Virginia, between 2023 and 2024, she later discovered that Bischellya had told both of her brothers (Douglas and Harrison) that Carey molested her. The three of them lived in Georgia together. Since Sandra lived in Arlington, she was totally unaware and did not prompt her daughter to confess to her brothers.

48. I asked the principal to watch me to protect me from children if parents used them to harass me during the PTA/Talent Show event. I informed her that I would sit up front so that she could see me and my children. Complying with my request, periodically she went on stage and looked at where I was sitting and nodded. I was relieved as I watched my daughter perform.

49. In 2010, I transported a neighbor to a doctor's appointment. On the way back home, I discovered that someone was trailing me, similar as in Georgia. The vehicle appeared and maintained the same speed behind me. I would randomly accelerate and decelerate on the highway to determine if the vehicle was maintaining the same speed, it did and would not pass me. Fearing my safety, I called 911 and described the incident and provided the description of the vehicle. The front of the vehicle had a Marine Corp emblem, so I slammed on my brakes to force the vehicle to pass me to get the license plate numbers.

50. As the burgundy Toyota mid-sized truck pulled up beside me, I provided it to the 911 operator. The caucasian male was wearing a green polo shirt. I motioned that I was on the phone with a 911 operator. He suddenly slowed down and jumped off the exit. As the 911 operator informed me, Law enforcement was parked on the highway ahead.

51. After the incident, I went directly to the police precinct to provide the tags and gain the identity of the individual. The police expressed difficulty in locating the name of the person. I contacted an attorney when I returned home, who informed me that the person was probably a well known undercover officer or private investigator.

52. I became more worried about the kids and decided to return to Georgia.

53. As Illuminati threats continued, they promised to design my son Harrison for jail/prison. He was going to be redesigned as the killer "Jeffrey Dahmer" and referred to Malvo the DC sniper as "their created model," incarcerated for life.

54. Harrison, who enjoyed good friends, socializing, and spending time with them, became reluctant to go out unless his mother was nearby upon their return. Sandra believes he still felt harassment. He was only comfortable if she transported him and his friends to events, or was reachable.

55. Sandra worried about her son Douglas and his location in the military. She deliberately missed his graduation from Basic Training to cover his location. Then appeared later as a casual visit to the base. Later, Douglas began to experience harassment which caused Sandra to contact the Army IG, who assisted her with filing an investigation while adhering to privacy laws.

56. Harrison had suspiciously obtained employment at a Kroger grocery store in the meat and seafood department. Oddly, Sandra remembered the threat to design Harrison as a Jeffrey Dahmer murderer. He later moved to Idaho with his brother Douglas, and oddly obtained a job as a "meat cutter." He was later being coaxed to obtain a license as a "professional meat cutter," I believe it was to achieve the goal of creating a believable background as a meat cutter to prepare him for a Jeffrey Dahmer persona. Direct employment as a meat cutter would be a believable story to frame him as a murderer who chopped up people and incarcerated for life. His siblings dissuaded him and encouraged him to finish college.

57. In addition or along with designing him as a murderer, the luminati threats were to make him a homosexual by sodomizing and raping him by accessing my home while I am away, prostitute him to men to frame him, introduce him to drugs and alcohol, prior to imprisonment. The future plan was to **“arrange a marriage with Harrison to a man.”**

58. Douglas got arrested for purchasing a BMW, the police claimed it was stolen although he had the purchase contract. The BMW had an erroneous VIN. Later, Sandra bought a small Honda from Colorado that was shown to her as a good deal, only to discover it too had an erroneous VIN.

59. Sandra sought the assistance from the Fulton County Solicitor General’s Office who informed her that she and the kids were victims of “corporate harassment.” They said it was difficult to prove unless “overtime” the evidence would become clearer and instructed her to obtain detailed information from all unusual events that could be used in court. Since 2009/2010 to date, no effort has been made to file complaints for court; however, the terrorism continues 16 years later, 2026.

60. Carey met Harrison and took him to a shooting range to teach him how to fire a weapon. Later, as Olivia continued to receive harassment as a young adult, she oddly implied that she should purchase a weapon for protection.

61. While visiting her father, an image of deceased singer Prince with the words “Satanic Luminati, Blood Sacrifice” was sent to his address. Prince famously wrote the words “slave” on his face in protest of control. The plaintiffs began being referred to as SLAVES to the rich.

62. In North Carolina, as she worked on the business, she experienced a burglary. She went to the police precinct to report it and described the continued terrorism of her children. Since she was totally shocked about this illuminating threat, and then the referral to Whitney Houston and her daughter Olivia as Bobbie Christina, both dead without anyone ever convicted of the crime.

63. While living in Arlington at Riverplace, she could only remember that the urban legend was that they were affiliated with the name Opus Dei. She discovered the name located on Wall Street in New York. She contacted them and provided her Riverplace Address as a contact location if they needed to see that she was a Christian and totally not the “streetwise” common person knowledgeable of that life. She went to the gate guards and instructed them if someone from New York appeared, to contact her because of the threats. She informed Opus Dei of the terrorism and death threats on her children and family. A priest responded that they were a financial center and were not the Illuminati. She apologized and then informed them of her business and solar energy concepts.

64. North Carolina was the first state to offer an investment in our business startup. Later California offered assistance with prototype development. A professor from the University of Georgia approached me while I was having coffee one morning and working on my laptop. He asked if he could speak to me about a conversation that I had earlier regarding data analytics for learning. We spoke for about an hour and afterwards, he asked that I write an executive summary. He indicated that funding may be available under the Race to the Top initiative and would consult with resources through a Former Senator Issackson’s Office. A professor from Clark Atlanta University who shared the love of art with me, offered to conduct research for our business, and development. While having coffee in Atlanta, a Washington DC Lobbyist introduced himself to me. He indicated that he was a lobbyist for Energy Companies. A professor from Rutgers University expressed interest in our tech products while traveling. Other professors expressed interest and offered support and possible references to funding sources. As the threats and burglaries intensified after each encounter, I moved to protect my children and get us to a safe place.

65. The purpose of the references is to establish the widespread interest in our company. That not only state and other investors expressed interest, that academia also indicated that what we were developing was of value and potential worth. A former Georgia Tech employee informed me that some of my professional recommendations had been adopted after I left. As stated in my performance evaluations, I have a talent for identifying barriers or problems while working on software development projects that offer viable solutions. I am proud of my professional experience and the vision for our company/trust.

66. Later, the plaintiff appeared before the Danville, Virginia City Council and informed them of the Illuminati threats on her and her children and family business in front of an audience from the local area and neighboring state of North Carolina.

67. At the age of 11, Olivia appeared before the City Council to inform them that she was scared before an audience of 75 citizens and reporters. City leaders came to meet her afterwards and pledged their protection. Olivia spoke before a neighboring city council and informed them as well.

68. At the age of 14, Olivia spoke before the Fulton County Board of Commissioners informing them of the terrorism in the presence of 200 or more people. Afterwards, representatives from the District Attorney's office came to meet her and others from organizations who were present.

69. The family continued to receive threats to poison, gas, rape, sodomize, make sexual contact, and prostitute the children as slaves to the rich. Her son Harrison commented that the "rich" will decide our future. Because Sandra was shocked to hear the statement from "her" child, she **documented it verbatim in court 2013, along with the threats to terrorize them all**. The kids were raised to believe in their intelligence and ability to achieve any goals of their choosing.

70. Following Douglas Jordan Grant's graduation from AIT at Fort Gordon, Georgia, in approximately 2010, Sandra personally went to the Base Commander's Office and met with OID personnel located near the auditorium where the graduation ceremony occurred.

71. Harrison became afraid to attend college because of the threats, after he was accepted. He informed Sandra that he would attend only if she transported him. The university was an hour and a half away. Sandra and Olivia would drive Harrison to college around 11 am and spend the day in the city where it was located, returning home at 10 pm. Oftentimes, she and Olivia would sleep in the car if he wanted to meet with his classmates until he was finished. Sometimes, his sister Bischellya would take him to school and stay with him to give us a break. We transported Harrison the entire semester, three times per week. He was happy and felt safe.

72. To help pay for college, Harrison got a job. He would not disclose where he worked to his siblings. Sandra discovered that he was given a job at a liquor store. She began to wonder if it was part of the plan to introduce him to alcohol. He had sent her photos of horrible sores on his legs, she believed he was poisoned and per a physician, it was "not bed bugs."

73. Douglas continued to experience other incidents of harassment while serving at other duty stations. Sandra visited Fort Bragg's IG Office in 2017 and spoke directly with personnel regarding harassment, unbeknownst to Douglas. She informed them of the divorce and the solar energy and other tech assets she developed as potential reasons for the continued terrorism.

74. Later, Douglas's mouth became deformed. He was diagnosed with facial palsy. I believe that he was poisoned as a warning not to talk. He was living in Decatur, GA. Olivia became afraid to eat out as we were threatened with poisoning our food, coffee, beverages, and products. Threats to poison my Nestle Coffee Creamer. Nair or some type of chemical was placed in Sandra's hair products to cause her hair to fall out, then "BALD" women began to appear to tease her. She stopped coloring her hair and only washed her hair every other MONTH or longer. After electing to wear a wig and let her hair grow, the students began following her and "Tossing their hair or running their fingers in their hair to tease." Chemicals were placed in Sandra's lotions to scar her skin to look her age because she wore a wig instead of going bald as was probably planned. I had purchased Nivea lotion over the counter and luckily only placed a little on the sides of my face near my ears.

75. My skin broke out causing sores, then students and women began appearing with scared bumps on their face. Terrorism using chemicals are my thoughts. I received biological and chemical threats. More teasing, students / women began teasing that my products would be tampered with if I didn't move out of Riverplace West and into the ghetto where I belong. At Riverplace we don't have many kids and I am very happy about that. So I can only assume that they wanted to move me to areas with more kids to tease and taunt me. Our housing is also in a metropolitan area and they want me to "Flee the country, Move to the country/rural areas, have them drop travel to Alaska, Iceland, Antarctica or the Arctic." I lock up and have locked up my products to ensure that "my children" would not be accused of MURDERING THEIR MOM and not them.

76. Later, Douglas, Harrison, and Olivia had their vehicles involved in car accidents, resulting in total losses.

77. The Defense Finance and Accounting had informed Sandra that Carey was not or had not paid full child support and owed her over \$14k. Believing that he would be a better father if he had extra money, Sandra wrote him a letter

informing him of the back pay and suggested that he pay whatever he wanted. He refused and she took him to court. He was ordered to pay an additional \$75 monthly after crying before the judge. He later informed Sandra that he could do whatever he wanted. He sought to block her military retirement and give it to his current wife, Renee. Carey lied to the judge and claimed that he didn't. Sandra traveled to Fort Benning Retirement Section who confirmed that Carey lied. He has avoided court since. Carey and his then wife Renee informed Douglas that his mother had "spent" all of his money for college. And although Douglas only needed \$2500 to pay for his dorm, they refused to help by claiming that I had squandered the child support money on myself. The plaintiff had paid the deposit for his dorm room and wanted the defendant to help pay half his fees since she was not working. Instead, the defendant purchased a Mercedes. When Douglas agreed to get a job to help pay the difference, the defendant would not help him but encouraged him to join the military instead.

78. I warned Carey that I could have taken him back to court to increase child support because when we met it was based solely on his retirement and not his VA employment. I asked him to just help get the kids into college and they would earn enough to pay for their personal items and the \$2000 for housing. He threatened to accuse me of "extortion" if I did.

79. A woman who possibly know or knew Carey, then tried to coax me into setting up "wealthy men" for money, extortion.

80. After moving back to Georgia, the plaintiffs experienced unusual gas smells. The gas company plugged the gas line. Then, her daughter experienced gas leaks at her home in Lovejoy, and later at her office. The plaintiff experienced carbon monoxide poisoning, per a physician. Later, in Morrow Georgia, Olivia experienced carbon monoxide poisoning that was so strong she felt nauseated. Sandra called 911 and Olivia described her symptoms and the event.

81. The plaintiffs experienced burglaries. On one occasion, while Sandra was at the Fulton County government/District Attorney's office complaining about the terrorism on her children, her vehicle was parked on the busy street adjacent to the Fulton County Government building approximately during the lunch period. The vehicle windows were broken and business materials were taken from the vehicle. The police precinct was less than 1,000 yards from the incident on a side street.

82. The stolen materials included business plans, software and technology designs, design details, business plans and papers, composition and notebooks that Sandra had intended to use in connection with an upcoming business meeting.

83. Sandra had been developing a technology business and had contemporaneous discussions concerning investments, website redevelopment, and a proposed transaction structure involving a percentage of transactions. The stolen materials therefore had business significance beyond ordinary personal papers.

84. A detective who investigated the incident commented, in substance, that the conduct did not appear consistent with an ordinary theft because personal property, left behind while business-related materials were removed. Plaintiffs will rely upon the actual police report and witness testimony for the precise facts and wording.

85. On another occasion, Sandra had removed from her home office a book containing current and future business and technology concepts and designs to attend another meeting. The book was ordinarily kept in the home and was familiar to the children. Believing that her living area was safe and no one would steal books and papers, she left it in the backseat for a subsequent followup meeting, and discovered that her car was burglarized again, stealing the business book and supporting business designs.

86. Plaintiffs also experienced additional burglaries or property intrusions involving computers, thumb drives, business documents, designs, process maps, architectural or technical diagrams, and computer power/charging equipment. Plaintiffs contend that the repeated loss of business-related materials is significant when considered with the other documented incidents and the current market value of similar products.

87. During one home burglary, heavy soiled shoe footprints were found throughout the residence. Police/forensic personnel responded and photographed the scene after Sandra described the food safety, personal safety of her minor children, and technology materials.

88. Plaintiffs later relocated to other states, including California in approximately 2014, in circumstances in which Sandra states that she was attempting to place greater distance between the family and the terrorism they had experienced.

89. After an attempt to move Harrison to California, a black man yelled at him “fuck you black boy,” she called Santa Monica 911. Harrison became afraid to go out, although the school welcomed him.

90. The plaintiffs began to experience more harassment and suggested they flee the country. This unusual censorship included restrictions from their normal neighborhoods/lifestyle to force them into unsafe poor areas for housing, suggesting that Sandra’s education and experience was aligned with entry level jobs and sent people to give her job applications to McDonald’s, Waffle House, or as a cashier to humiliate her and diminish her professional life, education, and experience.

91. When the defendant couldn’t find a job and contacted me for help, although divorced I sent him job announcements for jobs with salaries above \$80k. He had met his current wife and or was dating. I did not attempt to humiliate him with employment beneath his experience. I sent him jobs to support his education, experience, and lifestyle. And didn’t send him jobs as a cashier at McDonalds if he needed an extra income.

92. The family began receiving threats not to shop at any retailer or restaurant and linger, that her family could only shop and have their groceries, apparel, or restaurant food delivered or suffer harassment or would be poisoned if they sat to enjoy experiences of a public life. Children began coming into the libraries and sit or stand directly in front of me. An adult male who was sitting next to me scolded them and they left. Kids would follow me onto elevators, grocery stores, Starbucks, in church, movie theaters, and anywhere “outside of” areas where they wanted to place restrictions on my travel. I/we were not “allowed” to travel freely to other areas. An incident at Potomac Yards, after receiving threats, KIDS began waiting at the train station when I arrive and when I left. Guarding the area. Bus/train staff began coming onto the bus or train and stand or sit near me to “watch” me to protect the “INNOCENT KIDS” and discourage me from free travel, as the KIDS would snicker.

93. **Kids appeared at the PENTAGON METRO Station, as if they were guarding the Pentagon** and as a veteran I was NOT ALLOWED. As I exited the station, they ran up the escalator with the female adult who accompanied them. Elite kids accepted at the Pentagon, veterans censored. **A woman appeared with a dog at the Fort Myers gate and then threaten to “prevent me” from shopping at the commissary or military exchange, or visit the bases although it is my benefit.** I received threats **NOT TO VISIT the VA** or the same women and children threaten to poison my coffee and medicines. I wrote to the tobacco company attorneys to inform them that a plan was being devised to sue them for cigarette smoking on behalf of my children as they plotted lung cancer. I told them the "illuminati" method of how to “profit” from deaths by attacking companies and NOT to accept any civil complaint claiming lung cancer from their products.

94. Propaganda was being disseminated that I was a lesbian because I refused to date the men that coincidentally me. A man, whose baby mother’s mother is/or was a Pentagon employee. Who after meeting and didn’t know my full name invited me to come to spend the night at his home for a one night stand. Or the coincidental meeting of short, uneducated men who are McDonald’s employees and who live in the ghetto. Or the coincidental meeting of several recovering drug addicts or alcoholics.

95. Sandra noticed that “CAUTION” signs would be placed at her table where she and her children ate. Initially, the restaurant indicated it was the normal floor cleaning schedule and the signs were placed for safety when questioned why were signs placed directly at her table, as the kids appeared nervous. After an incident with “CAUTION” signs placed on “carpeting” at a department store and she touched the carpet and confirmed it was dry, with no evidence of a liquid spill, the clerk informed her that the overnight crew “forgot” to collect the “CAUTION” sign and it was not her job to remove it.

96. Much later, Sandra took her two young adult children to Las Vegas to relieve the stress of harassment and enjoy an adult vacation. They received more threats that regardless of where they went, “children” ruled the world.

97. Sandra and her children went out to enjoy the Vegas Strip and returned around 2:30 am. “Caution” signs were placed at the elevator and on the hallway where their room was. When they reached their room, three children under the age of 10 were playing directly in front of her room without a chaperone. The next morning, a handwritten note was at the “Caution” sign, “children rule the world.” Sandra began complaining to “all” Departments of Tourism

across the country of this level of harassment. Adults with adult children were not allowed to enjoy their lives was the question.

98. Olivia was being teased if she went out. Sandra discovered that she was not visiting her pool, the gym, going out, or socializing. Harrison began to follow a similar pattern as the teasing followed with the words “Afflictions”, “Anti-Social” and “Obey.”

99. Plaintiffs contend that these incidents, considered individually and collectively, caused substantial disruption and contributed to an ongoing sense of insecurity. She met a programmer from California who informed her that she needed “permission” to enter the tech industry despite her professional software development experience as a Project Director in the field.

100. Per the Securities and Exchange Commission (SEC) her family was experiencing the threats because of her assets: solar-energy, data analytics for learning, live gaming, and social interactive reading, and other concepts she had pursued to partner with other companies.

101. In 2017, technology/business assets were presented in a federal court matter in the Northern District of Georgia under Sandra’s married name, Sandra Grant, in connection with the court’s request for review and valuation of technology assets. She was represented by King and King Attorneys in Atlanta as proof of her development of the environment and tech assets and timeline.

102. The significance of Plaintiffs’ technology history is limited to providing context for the potential value of the business plans, designs, technical documents, storage media, and other materials that were repeatedly stolen or lost, and for Plaintiffs’ contention that the commercial value of their work warranted protection.

103. Plaintiffs do not allege that competitors, investors, foreign companies, technology companies, or other innovators were responsible for the conduct described herein merely because they later developed or commercialized related technologies. Plaintiffs remain focused on their own work and on ending the conduct directed at the family.

104. Presented as evidence of value and future value is the purpose of presenting her tech company, which is now under the jurisdiction of the Wilson-Hairston Family Trust. And, to dispel any rumors of jealousy or envy of anyone. The plaintiff moved numerous times over the past 16 years away from Georgia. This confirms that she could not possibly know the activities of anyone there.

105. Plaintiffs became concerned about possible medication, drug, chemical, or other exposure. Plaintiffs do not presently represent that the medical records conclusively establish poisoning. Plaintiffs seek preservation and review of the medical, EMS, toxicological, pharmacy, and follow-up records and reserve the right to amend if objective evidence establishes a causal connection.

106. It was suggested that the “luminati” was using Olivia and Douglas for therapy to obtain information for women who were pursuing her. That they were posing questions to Olivia’s therapist to obtain details to distort their family life and enhance her ex-husband’s life. I reported this threat to the social work and therapist licensing agencies, who **informed me of “ethics” and requested their license number and name for their investigation in 2011.** In 2025, **14 YEARS LATER, Olivia began therapy.** These woman/federal agents claim they were using Olivia’s therapist to ask her questions about me and her siblings to help protect my ex husband.

107. In 5th grade, at the age of 10. Olivia was pulled out of her classroom by a black woman who did not identify herself to question her about going to live with her father. Per Olivia, the woman asked questions about me. The principal was unaware of the incident. I took Olivia to Fulton County Child and Family Services to give my daughter a chance to speak if she was unhappy with me in our home and to question if one of their staff had pulled her out of her classroom. Legally, I was told they can pull a child out of the class to question them. The staff informed me that it was not them.

108. The source(s) claim they were going to obtain information, diagnose and medicate my children. And, build a mental health heritage beginning with my mother: Verna Mae Hairston (Motley) who died on my 11th birthday August 14th. They were going to claim that she had a mental illness, I had a mental illness, and subsequently my children have mental illnesses, and grandchildren have mental illnesses. Not true. My mother was an alcoholic and

was not mentally ill. She went to Goochland for alcohol treatment and recovery when I was 8 or 9 yrs old. Today, because of that history, I do not drink alcohol and my children never saw me drink nor did I allow it in my home. Today, I believe that is why they tried to offer alcohol and marijuana to my children, family history. Coincidentally, **after receiving a traffic ticket** and having to participate in a urinalysis, the results at the jail were **“traces of marijuana in my urine.” I actually laughed at the results.** I have seen photos of marijuana and even a joint but I have never tried marijuana, ever. They tried to convince me that it was probably from my beauty products. No. Not possible but the traces of marijuana in my urine still perplexes me today, how did that happen?

109. Then I recalled years earlier, I think someone tried to give me a “drug dealer’s” phone number through “MY EXHUSBAND” who was in the neighborhood that day at the same location where he was going to pick up Harrison. The residents were complaining about an upscale “wine and liquor” store coming near our subdivision that could result in questionable people coming to our quiet area. A man provided a phone number to me of a drug dealer and told me we/citizens/I should do something about it. Since the individuals plan their setups, now I wonder if that was a setup to associate my phone number with him.

110. While homosexuals began pursuing Harrison at age 13, she later discovered that her grandson Tavares had been introduced to a transvestite to humiliate him and as a result wanted to quit school. Sandra and Olivia experienced attacks from lesbians who were trying to solicit them as gay.

111. As the family sought to enjoy their lives, oddly citizens began spitting toward them. Sandra asked the kids to ignore the behavior.

112. Sandra later discovered that while Douglas moved to Idaho after discharge from the military, he experienced harassment to the point that he sought hospitalization.

113. Sandra sought therapy through her military healthcare benefits in 2002, devastated from grief of her daughter’s confession of being molested. She felt responsible for not protecting her.

114. Sandra sought therapy again through her military healthcare benefits in 2009/2010, as women began teasing her about her breast, with their breast. Her ex-husband would later stop by “Hooters” to bring Olivia to me after spending time with her. He laughed that she was hungry so he took her to get food bypassing 10 other restaurants for a quick meal such as Burger King, McDonalds, Wendy’s etc. Her ex husband knew that she was sensitive about her breast and the shape of her breast with scars. Her “breast” surgery is documented in her active duty military records. Women, she believes are related to or known by Carey began using their breasts and sexually to tease her. At one point to humiliate Sandra, Carey told her that **“she was not a woman.”** I have a vagina and that is one of the physical features required for gender classification.

115. Carey and I went shopping together, he didn’t like my style of dress or choices. He stood in J.C. Penney and screamed at me like a child, snatching the clothing out of my hand. Other shoppers, turned to look at him. I became so concerned with my appearance and my self confidence suffered. Not knowing what he wanted, I actually bought a long dress, similar to a gown with glitter and a jacket for work. For work, hoping he would approve. I reflect thinking that I was so unattractive to him and he expected me to dress like women from Detroit. What I wore was symbolic of my smaller town and it was not terrible.

116. As a wife playing with her husband, Carey was at school. He needed some items, so I sent them and included a card, sprayed some perfume he had given to me on it, kissed it with my lipstick and signature. Bought some sexy thongs and put it inside, thinking that he would love it. He called me and told me to NEVER do that again. He opened the box in his class and was embarrassed. I said your class is full of men, I am certain their wives did sexy things too. From that day until our separation and divorce I NEVER sent him anything and I didn’t buy anything special for bed.

117. Carey wanted a new Volvo, which we bought, we were moving to another duty station and the travel dates were overlapping Bischellya’s high school graduation. Instead of waiting to watch her graduate, he wanted to ship the new car and take the boys on a vacation, driving from California to see his parents and show off the new car. I asked him to adjust the travel dates so that we could all be present for her graduation. He protested and left. I shipped our other vehicle and decided to treat Bischellya with a road trip and through Las Vegas for a couple of nights to celebrate.

118. When I met Carey I was taking classes in the evening. He would wait outside of my classroom for me. I later wanted to complete a Master's Degree and we got into a huge argument because he wanted me to wait until he finished his bachelor's degree. My father in law counseled us and told Carey that I didn't need to wait. He suggested hiring a babysitter if we are both in classes on the same evening or take classes on alternate days. Carey said no. He didn't want any responsibilities while in school and had to take care of the family on the days I wouldn't be there.

119. Carey didn't approve of any of my friends, military spouses or military personnel unless they had rank. I said I enjoyed the company of both. When I invited them to dinner or to spend time with us, he made them feel unwelcomed. Two of my friends told me that he was "too controlling, and another said that Carey was jealous of me, oppressing my life. A friend who was a commissioned officer told me from the beginning that he was not interested in me, that he was an opportunist. He said that each time we spoke, I was making big purchases and it appeared to all support Carey's wants and not mine.

120. I planned a special anniversary. My friend was going to keep my daughter Bischellya for the entire weekend. I paid for an upscale hotel and an adult weekend. We left on Friday and were going to pick up Bischellya on Sunday night. Saturday morning, Carey said he wanted to pick up Bischellya. I was so angry. I am a fulltime mom, in school, no breaks and the one day annually where I can have an adult weekend, he wanted my daughter to come? I would have to iron clothing, arrange activities around my daughter, similar to being at home. He picked her up anyway. He didn't want to be alone with me. I came to terms that my friends were right. As long as he could get his material things, he was happy. His credit was terrible when we met. My credit score was close to perfect, or triple A at the time.

121. After my son was born, and the stress of being a single-married woman with a husband to also take care of, I decided to accept an early reduction in force discharge. The military was offering severances for certain jobs. I was offered \$25,000. As soon as the money was deposited, Carey wasted no time in spending it all within a couple of months on things that he wanted "for us."

122. I asked Carey to give our home to the children, deed it to them. Since I received retirement, worked, and had a VA income, I would pay for it, for them. He said no. I did not want to continue any personal nor financial ties with him. I negotiated with the Bank of America who would adjust the loan. Attorneys advised me on the steps to take. I attempted to obtain possession of the house, the locks were changed. Similar to current day, I am going to assume whoever has stalked and trailed us saw everything we did and sought to obstruct it. Later I discovered that he had bought a Mercedes.

123. In 2010, the therapist informed her that these women who were exposing their breast, vagina, or ass to me was a form of "hazing" and that it was nothing sexual, just women styled harassment. She informed me to just stay away from them, ignore them as silly immature women play, and that I did not need therapy.

124. Instead of Carey, they were going to murder me and the kids, then portray me as a predator and the children as criminals or mentally ill, instead of him.

125. Carey took Bischellya, while she was a minor, to a military hosted ball at the Turtle Bay Hilton, Oahu without Sandra's permission or knowledge. She discovered after 11 pm that he had taken her. Per my bestfriend's daughter, Carey had taken Bischellya out shopping for a gown, accessories, shoes, a manicure and pedicure, and hours at the beauty shop. She stated that she thought that I knew.

126. I discovered that Carey had paid for 2 hotel rooms and the girl was in one room with Douglas and Harrison when I found them. I did not locate Bischellya and Carey.

127. Later Bischellya brought me love letters someone had sent to her anonymously.

128. At one point, Carey asked permission to "Date my Daughter." He said it was the popular approach men were using to teach their daughters how a man was supposed to treat them, I said NO! I didn't like the connotations.

129. When Bischellya began dating William, he told me that he was going to talk to him, man to man. I told him NO! He is a minor, we are adults and I will threaten him not to harm my daughter. I am the mother, not his friend. Carey did sit and face William. I told him my standards as her mom. Later went to his parents home and told his mother to "control" their son and tell him to stop harassing her.

130. My best friend's daughter came to visit us in Georgia with her high school daughter and 10 yr old son. Prior to leaving that weekend, I invited her to breakfast and told her that children were being used to attack me. I asked her when she came to live with us as her mother was dying of cancer and the stepfather treated them badly. Did I ever do anything improper in front of her? I asked her if I looked at her or peeped at her, etc. She said NO! She said that I was strict but allowed them to date and socialize but I never made her feel uncomfortable. She then said that if her mother thought that I would abuse her, she would not have allowed her to come to live with us to finish high school. We had known this young lady since the age of 11.

131. Because kids were being used to attack me, after suggesting that my granddaughter sleep in a room with me while at my daughter's house, I said No. I didn't want any child, even my own grandchildren sharing a bed with me, being cautious.

132. When I babysit my granddaughters, I make them go into the bathroom and bathe together. They must be fully dressed before coming out. If they needed anything, they had to do it themselves, I would not open the door. I did that to prevent any manipulation or suggestion that I would harm them either.

133. Other incidents of terrorism, I used to call Olivia "bunny" affectionately until one day when I was chasing her to her school bus stop, I watched her fall to the ground crying. When I reached her, I saw the bloody dead bunny rabbit. I grabbed and hugged her to comfort her. I wouldn't allow her to go to school and instead took her home to talk to her. After she stopped crying, I took her to breakfast just to observe if she was ok enough to go to school or wanted to stay with me for the day. I took her to school around 10 or 11. I have never called her bunny since then. I felt that was another "Illuminati" threat.

134. Men and boys began rubbing their penis when they saw Olivia. They would look down and then look up at her, similar to the motions of lesbians to me. Boys began doing this to Harrison. As Olivia grew older groups of boys would appear wherever we went, the threat was to have sex with her. Over the years, women will still do the same after getting my attention, either showing their breast, their ass, or open their legs. As they dressed showing their body parts, at one point, Sandra asked her daughter not to look at the women who appeared with shorts or dresses to literally show their bare ass and run to walk in front of us. Olivia replied honestly, "mom, if I look up, I will walk into something. As the therapist informed me in 2010, these women were hazing and teasing; she advised me to ignore them and that I didn't have any mental or sexual issues.

135. Today, 16 YEARS later, the women will appear and walk toward me and either reach to their vagina in their shorts or run in front of me to show their ass. "Now" claims they do it to protect the kids, by having me look at them instead of kids. All child development centers have my business cards. I contacted national children's organizations and schools nationally and internationally like the NAEYC, Boys and Girls Clubs, Girl and Boy Scouts, school districts where my children attended school, and most where we didn't live and didn't attend school, etc. and informed them of the use of kids to terrorize us and 'EXTORT' for our business and informed them of the heinous sexual and physical attacks on my kids instead. They are aware of the criminal activity and I "instructed them to contact their parents and encourage them to file a police report if they thought that I harmed or stalked their children."

136. The threats included giving Carey a new life, using my family (Motleys and Hairstons) to abuse me and my kids, coverup abuse, and pledge their support of Carey, my ex husband and his wife Renee as a "better woman than me." In turn, they were going to collaborate with them and their friends to "develop our assets" and "provide financial support and housing or jobs to all" if they help. Family members were going to be "selected" for leadership, college, and business in exchange for their support to oppress my children and I.

137. On one occasion when my home was burglarized, these women cut my clothes, ripped the soles out of the few high heels that I had, and left their MERCEDES BENZ vehicle registration in my lingerie drawer.

138. My birth certificate was stolen from my personal folder on my desk in my bedroom. I began to receive messages that Carey's wife was 10 years younger than me. How would I know that and why would I care. I am divorced. Women and their kids began to tease my age.

139. When I discovered that Carey had remarried, I thought that he found someone with a good credit score and no children.

140. When I met Carey, I had two sports cars: 240Z Nissan, and a brand new Pontiac Fiero. After paying for the Fiero, I bought a Nissan 300z T-top convertible, Carey blew the motor on it. As a wedding present to Carey, I bought him a 240 Volvo with a customized sunroof. Carey didn't own a car at the time. I later cosigned for him to get a silver Volvo, a burgundy Volvo, and a Burgundy SUV. Carey then wanted a boat, and I was approved for a 24 foot Bayliner.

141. Carey wanted wall to wall carpeting in military housing because he didn't like the cold tile on his feet. I spent \$800 on carpeting that we couldn't take with us.

142. He wanted a big house that would further stress our finances, and it did. I had placed the boys in private school and wanted to continue it because they were so smart. Carey protested and made homelife miserable, so we got the house. Because of the expense, Carey became a paper boy, getting up at 2 am to deliver papers. Later, I enrolled Olivia into private school to ensure she could withstand the rigor of college since part of her educational experience was through home school.

143. I planned to separate from him and buy a home. Carey convinced me that he wanted the home for the kids too. He didn't have the money for the closing cost so I withdrew \$4,000 from my 401K.

144. I later discovered that Carey was not paying the bills and had our SUV repossessed. He allowed me to believe that it was stolen and that he would take care of it. I went to call the police and he confessed. He said that he missed one payment. I discovered that he had not paid most of the bills. He got a parttime job as a security guard at a cement plant.

145. When I got pregnant with Olivia, Carey took me shopping for a Mercedes. He told me that we could buy a home and the Mercedes would be mine, if I had an abortion. I refused. Carey admitted himself to Fort Gordon's Eisenhower Medical Center's Psych ward. Me and the boys drove him there from Atlanta. As we pulled us, Carey began kicking my car inside with his feet, breaking my door. When he got out to check in I drove away. The boys and I stayed overnight at the guesthouse on base and went home the next morning. I didn't contact Carey. He stayed for 30 days.

146. I was employed by Georgia Tech as a Project Director and had received a \$25,000 raise in an offer letter. I came home and handed the offer letter to Carey, hoping that he would be proud of me and happy that we could buy the Mercedes Benz he wanted. After reading the letter, he looked at me and asked me, "Did I think that I was better than him?" He still wanted me to have an abortion, even if he could still buy the car of his dreams.

147. His psychiatrist wanted to talk with me prior to his discharge. He told me that Carey didn't want the baby, Olivia. He said that he told Carey that together we earned more than him, his wife was a stay at home mom, his kids were in private school, they lived on base and had a good life. He told Carey that his morals were out of order and that the baby would bring him joy.

After a couple of years, I realized that the source(s) had no intention of going to court. They were planning to kill, make us sick, mentally ill, and incarcerate us, as promised. Once we were all sick, in jail, and or was dead, "ALL" would be free from future prosecution as a mafia-styled execution

148. Sandra believes that law enforcement and staff had and was being connected with the children to serve as "credible" informants against the children. In elementary school, it was planned to setup the kids and place them in juvenile detention. In high school in Virginia, Olivia received threats again to frame her. Sandra took Olivia to a police precinct to discuss the plans to destroy her with jail. Four years later, oddly as documented, Olivia gains a roommate who was or became a corrections officer in Georgia. Ironically, it reminded Sandra of the threats in Virginia to frame her with credible law enforcement and policing staff, that was suspiciously created through roommates.

149. Olivia, similar to giving Harrison a job directly at a liquor store to introduce him to alcohol which Sandra believes was intended to make him an alcoholic, was coaxed to take sips of alcohol at a supper club that offered liquor. Sandra believes that it was again fulfilling the plan to "make the kids alcoholics."

150. Olivia visited her father to obtain temporary shelter, knowing that he had 4 extra bedrooms. Carey couldn't talk to her and left before she could coordinate shelter. He never followed up with his 22 year old daughter.

151. Sandra filed complaints with HUD as efforts were “blocked” to obtain rental properties. She now believes the intent was to separate her and the kids so that citizens could become their roommates and introduce alcohol to them. Olivia, Douglas, and Harrison at various points suggested they obtain housing to share together as adults. Those efforts never materialized, deliberately. Sandra lost at least \$2,000 from deposits and fees from “imposters” of rental properties who would disappear and never meet her to provide the keys.

152. Sandra began receiving a military retirement in 2009, VA financial benefits, and child support, sufficient to pay rental properties. Instead, efforts were made to make her and the kids homeless despite the income. She believes it was “planned” to present a false lifestyle. In court, although she did not know Carey’s address, he told the judge that I was homeless.

153. Sandra discovered that Olivia was suffering from depression and attempted to move from Virginia back to Georgia to offer her support. Again, Sandra believes her housing was blocked and returned to Virginia.

154. Sandra began spending between \$500 to \$700 every other month to travel to Georgia to check on Olivia and her mental health. So hurt that after years of terrorism and harassment that resulted in her stating that she wanted to die, she was determined to be present for her 22 year old daughter. Depleting her savings, she contacted Carey to coordinate a tag team to check on her to save the travel expenses and still both parents provide her support. Carey indicated that Olivia needed to give him a “personal invitation” or he was not going to check on her. I told Carey that she was taking medication and depressed, as a parent I don’t need an invitation, and that I am going to barge in anyway as opposed to discovering that she was in the hospital resulting from her mental illness, as a father he should do the same. He refused unless invited.

155. Douglas informed me that while living in Idaho, he was harassed to the point where he checked himself into a psych ward.

156. My eldest daughter contacted me after having Ambulances pick her up from the shoulder of the highway and later again at a gas station because of anxiety, and asked me to come to Georgia because she needed me. I moved out of my apartment after hearing the trauma and fear from driving, and even leaving the house, then moved to live with her. While there, Bischellya had to know where I was at all times. If I went to sit on the porch and thought that she was asleep, she would call my name or come to the door to find me. She would lay down and slept alot. When she garnered enough courage to ride in the car, she could only sit in the back seat. She couldn’t work for 18 months. I paid her part of her rent to give her some income.

157. She discovered that Olivia was isolated and couldn’t go to her pool, to the gym, or just live. She was confined to her apartment unless working. She couldn’t get another vehicle and was dependent upon Uber. I bought her a membership at LA Fitness, which she liked. Then she quit. She wanted to go to her pool and didn’t have a swimsuit, so I bought one and sent it to her. She still couldn’t go. She asked me about a bicycle and oddly Harrison asked for a bicycle. I think they were being harassed and controlled, watched by citizens similar to my environment. If I go out to enjoy my life, oddly, SECURITY of some type, Transit Police and or citizens harass me or make me feel unwelcomed, even in public spaces like the library.

158. Olivia had begun saving \$150 monthly for her retirement and to ensure she had money for college at age 21. I was so proud of her as she said that she had roommates but was planning for college the next semester. She never went and instead of thriving, her life was being reduced to working only. My sister had wanted me to move to Danville to work in a warehouse, as luminati threats were that we would all become laborers. Ironically, Harrison’s first workplace experience was at Benchmark Physical Therapy. The director lived in our neighborhood and would pick up Harrison if I couldn’t. They claimed he had a good bedside manner and the patients loved his assistance. He was going to college to obtain a degree in Kinesiology. Olivia’s first job was a receptionist at a business cooperative, similar to WeWork. As planned, they were now reduced to laborers and their college education blocked.

159. Olivia was planning to come to Virginia and had a desire to attend Georgetown University or another local university. She was interested in volunteering at the Smithsonian and or in politics. I met a woman where students volunteered at a women’s political organization and discussed her volunteering there. As I received threats that Olivia was a “slave” and could “Only” work with her hands, that my kids were “only permitted a ghetto, low class life, I persisted. Olivia was excited about coming to the Washington DC area, like Harrison, to pick up their lives and continue to pursue their goals.

160. I went back to the political organization to inform them of Olivia's delay in moving to Rosslyn and subsequently volunteering. As I walked to the organization in Dupont Circle, Home Depot flyers were placed around the building on the sidewalk oddly from the corner to the building. When Sandra entered, she noticed a "Black Princess" playing the cello strings on a postcard styled flyer similar to the home depot flyers outside on the sidewalks. The Black Girl was wearing a purple gown. I then thought if someone was teasing because Olivia loved playing the strings, violin and was differentiating her from class, The Black Girl on the postcard flyer.

161. I asked the receptionist if it was shameful that Olivia had gotten a job at Home Depot to support herself and earn money for college? And then told her the story of someone who was trying to humiliate her and the family as "low class." She said no and if she was earning a living that's great.

162. Investors and VCs expressed interest in investing in our company, burglaries, thefts, harassment and disseminating lies of my kids and I to block any assistance. I was sent messages that "if I couldn't do it all myself" then no one would help. I had volunteers who wanted to help, then they disappeared. I shared with my family in Danville, they could not help, even with creating social media campaigns but they could post family social media. I invited the family (Motleys and Hairstons), none wanted to assist in any way.

163. I finished models, and all of the technical and functional requirements, my home burglarized and stole thumb drives and electronics. I had to start over again, purchase new computers and began carrying my laptop "everywhere I went." Whoever was orchestrating the events, including burglaries, claimed they would "divvy" up our assets to block its full earning potential.

164. I then learned that our websites had been blocked with warning signs not to access it because it could compromise sensitive data. We had not established the point of sales integration, at the time our goal was to build followers and mailing lists to contact customers once the services were available. I contacted SERTIGO and questioned why and who had placed the "block" on our website. Even more odd, the warning was established on my birthday, August 14th, ending the day prior the 13th, with annual renewal. Again, blocking or delaying the use of our ecommerce site.

165. I received messages that we were "Not allowed" to build our business for usage by the military community. I filed several complaints with the investigative web services component of the federal government of the incidents and hacking.

166. Later, and I am certain that the Department of Defense were unaware, a travel merger was announced between them and [Booking.com](https://www.booking.com), to compete with our SPACEA website. I discovered that our military spouse website: Wifey, designed to impact and enhance the spousal needs: jobs, business, careers while supporting servicemembers was also in competition with the Department of Defense. An announcement on my birthday, August 14th, was the investment in redesigning their military spouse website and had contracted a company to produce new training films.

167. Olivia excitedly wrote 251 pages for her book during our Sunday writing Mom and me days. She devised the plan to travel and encourage kids to write while selling her book. Olivia decided to offer girls, pearl bracelets with her books and turtle wrist bands for boys. She told me that she would release books at 50 to 70 pages, and every six months have the next book already waiting. All Olivia's ideas. To dissuade her from writing as "other kids" were better writers than her, her manuscripts were stolen twice. She rewrote them once, and the second theft, she almost gave up. I encouraged her to at least finish one book. Today, I have that final manuscript.

168. I then discovered that Olivia's book website: The Naughty Little Princess, also had a warning block not to access it. Again, I complained and never received a response. Olivia was selling her book as an ebook with pearl bracelets for girls and turtle bands for boys. She was "not" collecting any sensitive data.

169. To protect Olivia, I bought her neck earphones and later an Apple watch to capture anyone who approached her. Her watch was stolen. I bought her another one a month later, and that watch was stolen too. The hands free neck earphones were stolen too. I bought it because she could place it under her jacket and no one could see it. Sandra believes that someone was trying to control Olivia's environment and anyone that she would meet or talk to would be captured on her watch or earphones.

170. Olivia, like Harrison, were very meticulous about their attire and hair. Harrison began telling me that getting his hair groomed was “acting white.” I asked him, “Do you think that our ancestors did comb or brush their hair?” Then he stopped grooming his hair. Harrison got a tattoo, as Illuminati claimed they were “branding my children.” He later got the same tattoo “One Love” in cursive on both legs on the front at feet, and later the threat “to make Olivia wild” teasing she would get tattoos but would not get her hair groomed or dress well as she preferred. She came to visit me and her hair was horrible but she had gotten tattoos? Black women began teasing Olivia’s hair and later teasing my hair that continues today. I paid for her to get her hair done. I think it was the effort to design us as low class, while building up Carey’s life.

171. The kids were all above average and loved reading. Propaganda that “my kids and I” are illiterate. A contradiction to their grades and annual tests. Harrison passed his high school graduation test in the 11th grade, first effort. He was taking honors English. The kids were being offered the military or jobs as laborers. 152. The kids were all above average and loved reading. Propaganda that “my kids and I” are illiterate. A contradiction to their grades and annual tests. Harrison passed his high school graduation test in the 11th grade, first effort. He was taking honors English. The children made honor roll, principal’s list, and other academic achievements. They were recommended for academic, music, accelerated classes, and leadership camps. pursued their interest, I provided opportunities and exposure for them. Because of bullying, Olivia asked for homeschool which I enjoyed with her.

172. As we set goals each January of things we would like to achieve for the year, Olivia’s goal was to join the swim team. She started studying Michael Phelps videos and discussed a plan to swim every night or 3 times a week in our indoor pool. I told her that we would practice at 9 or 9:30 pm because the pool closed at 10. That would ensure the pool was vacant during the week because at that time most kids are preparing for bed. We began in the winter. The pool was located away from the apartments in the recreation and entertainment area at the front gate.

173. After a successful couple of weeks, I received threats that Olivia had to stop swimming. I ignored the threats and continued our schedule. Then one night while I sat and read while Olivia swam, a black man wearing purple appeared and just stood at the side of the pool looking at her swim for a few minutes and then left. The next day or two days later, 3 kids entered the pool and turned the lights out and started laughing. They were between the ages of 9 and 13. I yelled for Olivia to get out of the pool and turn the lights back on, and the kids left. We left and outside as we walked to our vehicle, a car turned on their lights, then high beam lights until we left.

174. Days later, Security appeared and questioned us about swimming so late. She said that she locked the doors at 10. I looked at my phone and told her well, we have 15 more minutes. The Security guard then sat there until 10. And until we moved, SECURITY began appearing and sat beside the pool or stood until we left. Olivia was harassed while swimming. I knew that it was setup because of the location of the pool away from the apartments and it was freezing cold outside. No decent parent would send their kids to a pool “without a life guard” that late at night. If they were injured, no one would hear their calls for help. I reported the incident and the MONITORING and harassment by SECURITY to management.

175. At the apartment, I would take my grandson to the play area and work on business while he played. The management approached me about 100s of pictures with naked women found on the computer in the room. According to the cameras, we were the last to visit. I questioned if the computer was connected to the internet, they said no. Then I told them that if someone had “downloaded” naked photos of women, it was from a disc and NOT the internet. Security began to monitor us again until I escalated my complaint and the company DISCOVERED some boys had done it and had falsely implied that it was me.

176. Since 2014, SECURITY was the propaganda that they were PROTECTING us. That was totally not true. Olivia told me one day that she didn’t feel safe with the police and security. Today, SECURITY appears if I ride the train or bus. If I go outside in our courtyard during the evening or night. SECURITY isn’t protecting us. Since middle school, it has been harassment. The irony is, since security is present according to the timeline, did they or the police from those documented 12 years uncover any “criminal activity” that I committed?

177. To fulfill her dream, Olivia tried out for the high school swim team and made it, despite the harassment from the kids. Her swim instructor said that she was a better swimmer than kids on the team the previous year. She would get up at 4:45 AM, I would drop her off and walk back to exercise. Olivia was so happy, then quit school again because of bullying despite having a new counselor from Georgia receive employment at the school in California.

178. Olivia decided to attend high school in person in California. Harrison's high school counselor in Georgia, ironically moved to California and became Olivia's counselor. I thought he would have been a support system for her since he had known the family through counseling Harrison in Georgia. I picked her up from school one day and she was crying and didn't want to go back. She was being bullied again and despite the counselor being there. In Georgia, they adopted "anti-bullying" laws, yet the students bullied my kid and bullied me.

179. Harrison was in college and needed to move. I coordinated a dorm room for him and agreed to pay \$700 monthly to keep him until he got a job. It delayed my plan to obtain a permanent apartment in California. I discussed the issue about Harrison and we agreed that we were safe with people who became our friends. Although Carey was in Georgia and knew that Harrison was in college and doing well and only needed a little help until he got a job to support himself while in school, he didn't. I tried to explain that 3 years to get a good kid through college was a worthwhile investment. It was what he and Douglas wanted and both were very smart.

180. I gladly paid the \$700 monthly from my retirement income for several months. Olivia and I would say each month, this is for Harrison, we are ok.

181. I moved out of Georgia in 2010 and spent \$8,000 to move with no intentions of returning. After the harassment continued in North Carolina, I moved back to Georgia spending \$7,000. The harassment continued in Georgia, so I decided in 2014 to move to California spending \$3,000, knowing no one. I was trying to place distance between us and whoever was orchestrating attacks on my kids. It was also confirmation that I/we were "NOT" bothering anyone in Georgia and I didn't leave any forwarding addresses. I wanted to determine who was behind the terrorism. We were optimistically pursuing safety and a new life. I returned to Georgia after it became very expensive. I then moved to Virginia and back to California. The harassment continued wherever we went. I realized it was planned and someone was using money to do it.

182. I had met directly with several federal agents/agencies in Georgia, so they knew of the Illuminati threats on my children. I filed Congressional Inquiries in 2012, legal complaints in 2013, another Congressional Inquiry in 2017, and again in 2022 in other states. Was it Blackwater? CIA? FBI? As state police informed me that they can't cross state lines. As we traveled through states, I made certain that I contacted their Attorney General to inform them and City Departments if I stayed overnight in a hotel or drove through their state, some I provided legal documents of terrorism that I had filed in courts and police reports, all to protect Olivia, Douglas, and Harrison to ensure we were not "hiding" fleeing criminals.

183. I believe my children were being setup to be connected to the Mexican Cartel through dating. They claim they were employing people to meet my children. Oddly, Harrison meets a hispanic woman and oddly all of his jobs become associated with them. He couldn't disclose where he was working. Then Olivia met someone on the job, hispanic, and she was taken to his family's ranch. Prior to meeting him, Olivia was being bullied by hispanic girls. I was being bullied for buying curly wigs by hispanics. When Olivia came to visit me in Washington DC, she gave an expression of dislike when she saw them. I thought how can she suddenly be associated with them and felt teased as inferior to their beauty.

184. Hispanic ranch? I began to worry because the threats were originally to murder Olivia as a replica of Bobbie Christina, Whitney Houston's daughter, through the boyfriend model. Olivia moved out and we were relieved. I was receiving threats that Olivia would be taken to Louisiana and make her disappear. Her boyfriend later tried to convince her to move there so that he could enter a "plumbing" training program. We all asked, why did he need to move to Louisiana to do that? Atlanta had plumbing training in the city? I never told them that I was being tormented that Olivia was going to be deceived into going there.

185. The ranch. My grandson Damien went to California and became secluded on a ranch there and couldn't talk to any of us. I definitely didn't have any conflicts with him before he left. His mom, Bischellya, and Kevin had domestic violence incidents and was arrested for child endangerment. I was his protector and after being placed on the ranch, he literally disappeared. I haven't heard his voice since he graduated a couple of years before the pandemic.

186. Kevin was not the model father because his mother is a schizophrenic and was incarcerated for murder for years. He told me that he understood that she was sick and the kids accepted that. She was released from prison but still suffers with mental illness. He matured and grew through my daughter's demand to be a present father.

187. The person/persons responsible for attacking my family kept trying to isolate us from the city and force us into rural life. The reason possibly is that attacks are less detected in isolated areas versus city life and the prevalence of cameras. If Olivia is at her boyfriend's ranch, if she is attacked, and if he is setting her up with the cartel, no one would know. As I have to manage experiences with feasibility, the evilness we have encountered for 16 YEARS have led me to believe it is possible that each of us were being targeted for jail or murder and not court.

188. In Rosslyn, I met a black boy who was in college on a track scholarship at UTEP in Texas, per his mom he disappeared in Mexico for almost a year and from college. When she found him, he was never the same and was homeless in Rosslyn standing in front of Safeway. He was so articulate I couldn't believe he was homeless. I bought a ticket for him to return to his mom in Detroit after convincing him to let me contact her. I sat in Union Station until 3 am to get him on the bus back home.

189. I worry that Olivia and Harrison were targeted, as promised by luminati or whoever is paying them, to meet them. The plan to make Olivia an alcoholic and a prostitute, possible on an isolated ranch. And per the boyfriend, she didn't want to have friends nor be associated with family? Similar to the Bobbie Christina plan. As a mom, I can only disclose to the authorities and check on my daughter. None of this was her life. I believe this is why my housing was being blocked to get to her and Harrison. I believe this is why we are being harassed in Rosslyn now, over a thousand cameras in my area and 100 on our property alone. I deliberately stand at Freedom Park on Arlington Boulevard because the cameras show the cars and tags. The State Department, Homeland Security, and major corporations in the area, and the ABCNews directly adjacent to our property. When I protest in the city, hundreds of cameras and hi-rise buildings are on all four corners.

190. Two years ago, I protested in Rosslyn directly in front of the ABCNews building. The Posters had each of my children's names, references to court cases, their ages, the length of terrorism, and our business/trust website, www.purculate.com. It also included Carey's information and child molestation. I protested in front of Union Station, directly across from the park at the US Senate buildings, with the same information. I protested in front of the Holocaust Museum directly in front of it with the same information and spoke with visitors who wanted to know about the children and I passed out business cards in all locations and met foreigners who also wanted to know about the terrorism and my 10 year old daughter and 13 year old son. Many contacted me afterwards through my business card or the business website on the posters.

191. A retired agent/ officer warned me that he had seen incidents of innocent people setup and recommended that I make my children and myself visible, everywhere because of our tech assets. I made certain that whenever I wrote a letter or communicated professionally, that my signature block included our website. On the website contain the business information and the information pertaining to terrorism.

192. I wrote to the Library Accreditation for Idaho regarding harassment of my daughter Olivia during the pandemic and provided her website so that the staff could see her photo. I wrote to all of the Presidential Libraries until 2025 and included our website in the signature to preserve our company website.

193. Oddly, while in California and later visiting Douglas and Olivia in Idaho, I began to meet Black Isrealites. I recalled their protest on CNN in Atlanta on the news. They hate Jews. I had never met any prior to this and wonder if it is the same setup of my daughter with hispanics. I began talking about my faith and unity and love or accepting others for humanity and the problems we all face. Then moved back to Rosslyn and within a month, a Black Isrealite was praying at Freedom Park. I had just begun to meet them, and even more troubling, one told me **that someone had promised to give them free housing or land**. I wondered if it was the same bounty on the head of me and the children. Free housing for all as "the they" collected business and the rich would give housing. Later I was told that it was some old laws and land disputes that could possibly be used. Today, like Olivia and Harrison, we are threatened then the threats are executed. Ironically, housing is what was being offered to us in exchange for our tech business/trust while denying our family financial benefits from "our" intellectual property. Luminati setup Olivia with boyfriends? Blocking her education? She was still planning to come to go to college and now connected to them with threats to connect her to the cartel? What would be the chance that I would meet people from the Black Isrealites? Sending messages that the Jews never did anything for blacks, I don't agree with antisemitism at all.

194. Propaganda today is that the kids are "adults" now and making their own decisions as a deception for control. As I plan for the future, I published the "legal" boundaries, recourse, and requirements in case they are not attorneys, and to ensure they would not be deceived by the rich/luminati. Conservatorship laws protecting people who make decisions out of duress like terrorism of the children, international anti-terrorism laws, federal and state laws

pertaining to property ownership linked to terrorism and or murder. The family knows about the terrorism of my children and the plan to destroy each of them. Details are on the website: www.purculate.com to ensure if they visit, they know and could face legal challenges in court.

195. Effort was made to infer incompetence to continue to constrain our lives, business/trust and profits, I placed my performance appraisals on the website as “proof of competence” specifically in software development over a 10 year period that included a promotion and a raise. In the verbiage, it also included my talent for process improvements, complimentary of our business vision and new concepts, my supervisor stated that talent in particular.

196. I received development/technical support through “The Garage” in Augusta Georgia for our “live” drone gaming device. Drone donations were provided by military veterans for testing, however, I elected to close the project after some testing issues with the sensors for the devices. During the initial screening, we talked of possibly hosting an event specifically to launch the product.

197. I spoke to the City Council near Olivia’s high school in California, provided them with legal documents for a timeline of harassment and confirmation of her age to them to get support. I then met the Chief of Police to inform them of the terrorism of my kids because we didn’t know anyone. Later, the Virginia State Police informed me if the harassment is continuous, it is the feds because they have jurisdictional limitations.

198. I reflected and realized that the addresses of me and the kids had a common term, STONE. In 2010, the kids and I moved out of state and found a place on **CopperSTONE**, then moved back to Georgia to **HartSTONE**. Douglas discharged from the military and moved to Meridian Idaho to the **SilverSTONE** community. After my housing was blocked and Olivia moved in with her roommate, I finally visited her from Arlington and noticed that she lived directly across the street from **FieldSTONE**. And even more eerie, as Douglas received threats and I have to manage “reality” from coincidences. School threats again and then a shooting in Florida at Douglas **STONEman** High School? How coincidental is that? And then she couldn’t enjoy her pool or gym or life, she was confined to her apartment, taking medication, and suffering from depression? Sending messages that she does not want to socialize or be with her family? Douglas checked into a psych ward in Idaho? To manage my sensibilities and mental health, I no longer believe the news unless I can verify it. From 2010 until 2025, the housing of my children and I have been known.

199. Sandra began receiving messages that my kids were “happier” as the new models and only wanted to work, have sex, drink alcohol, or smoke marijuana. As documented in a 2013 court document, the premeditated plan was to “make my kids do whatever they wanted” and we had no choice except to do what the RICH tells us we can.

200. Sandra received threats of “**blackmail**” if we continued with the business. In 2010, a plain brown envelope was placed on her windshield. She opened it and a disc was inside of a cartoon. I took it inside and placed it in my CD player, images of my Nissan Murando and photos of a Black Lincoln Towncar in several locations were on the CD. Since, someone has attempted to silence me by spreading propaganda and misinformation. No one has ever filed complaints in court.

201. I met women and men from fraternities and sororities who encouraged me to take action if their organizations were being used for personal vendettas. Unfortunately, I can’t distinguish those who value and respect their organizations versus those who exploit it and were/are using them to attack us. Whoever are the orchestrators, have indicated that they have solicited black and white branches of these organizations to attack me and my children from the ages of 9, 13, and 16 for business.

202. I have met CIA, FBI, ATF, DEA, SWAT teams, local, state, special police, transit police, special police, sheriffs, and local law enforcement in person, spoken to them on the phone, or through email. Many were provided “credible” evidence of terrorism in the form of harassment, burglaries, and stalking. I explained that my job is to report, and they confirmed that it is their job to investigate. Though unbeknownst to me, many affirmed they were aware of the luminati, a mafia-styled organization.

203. The kids and I are still unsafe, have experienced continuous attacks, and are constantly setup, but no one will go to file a complaint before a judge. I attempted to obtain a protective order in Clayton County Georgia courts. Atlanta police informed me they couldn’t violate Carey’s civil rights by stalking him, however, me and my children have been stalked and terrorized for 16 years, thousands of days.

204. Sandra believes that she was going to be “setup” to accept her daughter Olivia being “abused” for money or marriage to a millionaire. And, that it would be coordinated as an approved arranged marriage to cover up abuse. My son Harrison would “marry” a homosexual to coverup abuse.

205. Sandra believes that she was going to be “setup” as accepting her son Douglas’s life insurance after he was murdered. Her sister Betty asked her later to become her beneficiary and I declined. I remembered the depth in which we were being setup as arrogant and greedy for money. My children’s future for money.

206. The sources claimed they could “**teach people how to pass a lie detector test**” outside of the courts to avoid cross examination and gain “**street support**” while avoiding court and stalling it as they prepare my kids and I for death and a credible story to support a clean death.

207. Inducing mental illness. During the pandemic discussion ensued regarding PTSD during the daily new programming. As a professional in the mental health field and an educational background in psychology, I knew that PTSD was “not” a military-related mental illness. Psychiatrist and Psychologist discuss the rise in Post Traumatic Stress Disorders in civilians resulting from the isolation, stress, and uncertainty of COVID-19. If 14 to 30 days of trauma can induce PTSD, imagine the trauma of a 10, 13, or 16 year old who knows nothing about psychological terrorism? And, experience it everyday for 16 years. It is/was evil/heinous acts of psychological terrorism to destroy kids. **The medical results of depression and anxiety with medications is not my imagination nor my personal opinion although, I could assert that. It is medical evidence resulting from successive years of attacks which is a criminal offense.**

208. The mere pressure of a Pandemic induced PTSD and limited isolation versus YEARS of terrorism that is documented and confirmed by age along with the oddity of addresses in which the kids live and the continued similarities of experiences.

209. Plaintiffs allege continuing conduct that has included, among other things:

- (a) threats and intimidation directed at Plaintiffs or members of the family;
- (b) repeated unwanted surveillance, following, monitoring, or other conduct Plaintiffs understood as stalking or harassment;
- (c) property damage, unauthorized entry, burglaries, and theft of personal and business materials;
- (d) interference with housing, locks, utilities, vehicles, and relocation;
- (e) interference with employment, education, travel, shopping, library use, church attendance, and other ordinary activities;
- (f) conduct that Plaintiffs understood as attempts to damage the reputations or future opportunities of the children;
- (g) conduct that Plaintiffs contend interfered with development or protection of family business and technology assets;
- (h) conduct that Plaintiffs contend created continuing fear for physical safety, psychological harm, physical harm, sexual assault, to induce suicide, or death; and
- (i) other acts presently known to Plaintiffs and additional acts that may be identified through records and discovery.

210. Sandra alleges substantial emotional distress, fear, disruption of housing and employment, relocation costs, property loss, business losses, loss of opportunities, and other economic and non-economic damages.

211. Olivia alleges individual emotional, educational, reputational, and other injuries arising from conduct directed at or affecting her while she was a minor and thereafter, to the extent legally recoverable.

212. Harrison alleges individual emotional, educational, reputational, and other injuries arising from conduct directed at or affecting him while he was a minor and thereafter, to the extent legally recoverable.

213. Douglas alleges individual physical, emotional, educational, reputational, and other injuries arising from conduct directed at or affecting him while he was a minor and thereafter, to the extent legally recoverable.

214. Each Plaintiff reserves the right to provide medical, counseling, educational, employment, financial, property, and other records supporting individual damages.

215. Threat to have exposed Olivia and Douglas to radiation to induce cancer, along with Sandra.

CLAIMS FOR RELIEF

216. Plaintiffs seek relief for the underlying civil wrongs supported by the evidence, which may include, as appropriate and legally cognizable under Georgia law: trespass to property; conversion or theft-related property loss to the extent a civil claim is available; intentional interference with business or contractual relations where the required elements are proven; intentional infliction of emotional distress where the required elements are proven; property damage; invasion of privacy or related tortious conduct where supported by the evidence; civil conspiracy or concerted action where the required elements are proven; and injunctive relief to prevent continuing unlawful conduct.

217. Plaintiffs do not rely upon the mere naming of a criminal offense as a standalone civil cause of action. References to stalking, harassment, threats, or other criminal conduct are intended to describe the factual conduct and notice relevant to Plaintiffs' civil claims and requested relief.

218. Plaintiffs reserve the right to amend, clarify, add, or remove particular counts after review of the complete records and discovery.

PUNITIVE DAMAGES

219. Plaintiffs seek punitive damages to the fullest extent permitted by Georgia law if the evidence establishes the statutory grounds for such damages, including willful misconduct, malice, fraud, wantonness, oppression, or conscious indifference to consequences.

220. Plaintiffs specifically pray for punitive damages in the amount of \$10,000,000 for each Plaintiff, to the fullest extent permitted by law. Plaintiffs understand that the amount ultimately recoverable is governed by Georgia law and that any statutory limitation or exception will be determined by the Court based upon the evidence and applicable law.

221. Plaintiffs specifically allege that, if discovery establishes that Defendant acted with specific intent to cause harm to one or more Plaintiffs, Plaintiffs seek application of any statutory provision governing punitive damages that permits recovery beyond an otherwise applicable limitation.

INJUNCTIVE AND PROTECTIVE RELIEF

222. Plaintiffs request appropriate injunctive relief prohibiting Defendant, directly or indirectly, from engaging in unlawful stalking, harassment, intimidation, threats, trespass, property interference, surveillance, unwanted contact, interference with Plaintiffs' residences or property, or other unlawful conduct established by the evidence.

223. Plaintiffs further request that Defendant be prohibited from directing, encouraging, assisting, financing, facilitating, or knowingly participating in unlawful conduct by other persons against Plaintiffs, to the extent such relief is authorized by law and supported by the evidence.

224. Plaintiffs request any additional narrowly tailored protective provisions the Court determines are necessary to prevent recurrence of proven unlawful conduct.

DAMAGES AND OTHER RELIEF

225. Plaintiffs seek compensatory damages for property loss, business losses, relocation expenses, lost opportunities, medical and counseling expenses, and other economic losses proven at trial.

226. Plaintiffs seek general and non-economic damages to the extent permitted by law for emotional distress, loss of peace and security, disruption of family life, and other legally compensable injuries.

227. Plaintiffs seek punitive damages as specifically prayed above, subject to Georgia law.

228. Any recovery awarded to an individual Plaintiff shall belong to that Plaintiff and shall be subject to such lawful protections, restrictions, or structured arrangements as may be ordered or approved by the Court for the protection of that Plaintiff's long-term interests.

229. Plaintiffs seek taxable costs and any other relief authorized by law.

EVIDENCE AND DISCOVERY

230. Plaintiffs presently possess or seek to obtain police reports, court records, photographs, medical and EMS records, utility records, governmental correspondence, business records, technology records, financial records, communications, witness testimony, and other evidence.

231. Plaintiffs anticipate discovery concerning Defendant's knowledge, communications, contacts, property interests, financial relationships, communications with third parties, and any involvement in or knowledge of the conduct described herein.

232. Plaintiffs request preservation of electronically stored information, communications, photographs, videos, location or access records, financial records, business records, and other evidence reasonably related to the claims.

STATUTE OF LIMITATIONS AND CONTINUING CONDUCT

233. Plaintiffs recognize that individual causes of action may be subject to different statutes of limitation and accrual rules. Plaintiffs do not contend that every event dating to 2008 is automatically actionable without regard to applicable limitation periods.

234. Plaintiffs allege, however, that later acts, continuing interference, newly occurring injuries, recent conduct, and acts within applicable limitation periods independently support the claims asserted herein to the extent permitted by law.

235. Plaintiffs further rely upon earlier events as factual background, evidence of notice, pattern, motive, damages, and context where legally admissible, without assuming that any otherwise time-barred claim is revived.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that the Court:

- A. exercise jurisdiction over the parties and claims properly before the Court;
- B. issue appropriate temporary, preliminary, and permanent injunctive relief after the procedures required by law;
- C. award compensatory, special, general, and other legally recoverable damages proven at trial;
- D. award punitive damages in the amount of \$10,000,000 for each Plaintiff, to the fullest extent permitted by Georgia law;
- E. award costs and other relief authorized by law;
- F. order preservation and production of relevant evidence as authorized by the Georgia Civil Practice Act;

G. permit Plaintiffs to amend this Complaint as discovery and investigation establish additional facts or persons responsible; and

H. grant such other and further relief as the Court deems just and proper.

JURY DEMAND

Plaintiffs demand trial by jury on all issues for which a jury trial is available as a matter of law.

VERIFICATION

I, Sandra Gail Motley, being competent to testify, state that I have reviewed the foregoing Complaint and that the factual statements concerning matters within my personal knowledge are true and correct to the best of my knowledge and belief. I understand that statements concerning matters reported by others, records not yet obtained, or matters requiring discovery are identified or should be treated as such.

This ____ day of _____, 2026.

Sandra Gail Motley, Plaintiff Pro Se
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