

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

| | |
|----------------------------------|---|
| ROBERT DAVID STEELE |) |
| -and- |) |
| EARTH INTELLIGENCE NETWORK |) |
| Plaintiffs, |) |
| v. |) |
| JASON GOODMAN |) |
| PATRICIA A. NEGRON |) |
| -and- |) |
| SUSAN A. LUTZKE a/k/a"QUEEN TUT" |) |
| Defendants. |) |
| _____ |) |

Case No. 3:17-cv-601-MHL
DEFENDANT DEMANDS
DISMISSAL WITH PREJUDICE

ANSWER

Plaintiffs, Robert David Steele and Earth Intelligence Network, by counsel, have filed a frivolous Complaint with no evidentiary value against Defendant, Jason Goodman (“Goodman”). As detailed in the Special Motion to Dismiss, Plaintiff has brought an amended complaint and the collective action is believed by Goodman to be a Strategic Lawsuit Against Public Participation. The action represents an effort to suppress journalistic reporting of prima facie evidence that shows felony charity fraud by Plaintiffs, Robert David Steele and Earth Intelligence Network.

It is Goodman’s belief Plaintiff has deliberately caused defects in the original complaint and conspired with Codefendants to bring about the amended complaint in Plaintiff’s ongoing effort to burden Goodman with frivolous and punitive civil action.

Plaintiff seeks (a) compensatory damages, statutory damages (three-fold the damages sustained), and punitive damages in an amount not less than \$18,350,000.00, however this amount is arbitrary and not reflective of the value of Plaintiff’s current or past business operations or annual earnings as reported in 990 forms submitted to the IRS.

I. PARTIES

1. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.

2. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

3. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

4. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

5. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

6. DENY

7. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation elsewhere

8. Defendant, Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

9. Defendant, Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

II. JURISDICTION AND VENUE

10. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

11. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

12. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.

13.

III. STATEMENT OF THE FACTS

14. DENY

15. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation .

16. DENY

17. Defendant lacks knowledge or information sufficient to form a belief about the truth of this

18. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

19. DENY

A. False and Defamatory Statements Prior to September 1, 2017

20. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

21. DENY

B. False and Defamatory Statements Since September 1, 2017

22. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

23. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

24. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

25. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

26. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

27. ADMIT

Case 3:17-cv-00601-MHL Defendant's Answer Page 4 of 8

28. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

C. False and Defamatory Statements Since December 25, 2017

29. DENY

30. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

31. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation\

32. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

COUNT I – DEFAMATION PER SE

33. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

34. DENY

35. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

36. DENY

37. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

38. DENY

39. DENY

40. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

COUNT II – INSULTING WORDS

41. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

42. DENY

43. DENY

44. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

COUNT III – BUSINESS CONSPIRACY

45. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

46. DENY

47. DENY

48. DENY

49. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

50. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

COUNT IV – COMMON LAW CONSPIRACY

51. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.

52. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.

53. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

COUNT V – TORTIOUS INTERFERENCE

54. Defendant lacks knowledge or information sufficient to form a belief about the

truth of this allegation

55. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

56. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

57. DENY

58. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

COUNT VI – INTENTIONAL INELICTION OF EMOTIONAL DISTRESS

59. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

60. DENY

61. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

62. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

63. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

64. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

COUNT VII – PERSONAL TRESPASS AND COMPUTER HARASSMENT

65. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

66. DENY

67. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.

68. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

69. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

COUNT VIII – UNAUTHORIZED USE OF NAME AND PICTURE (§ 8.01-40)

70. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

71. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

72. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

73. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

COUNT IX – PERMANENT INJUNCTION

74. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

75. DENY

76. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

77. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

78. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

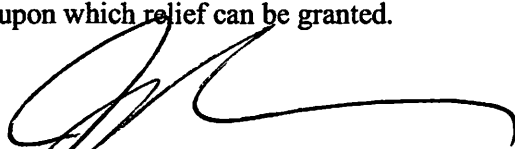
the right to amend this Complaint upon discovery of additional instances of the Defendants' defamation and wrongdoing.

Case 3:17-cv-00601-MHL Defendant's Answer Page 8 of 8

CONCLUSION

The plaintiff has failed to state a claim upon which relief can be granted.

By: _____



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