

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

LARRY KLAYMAN,
a Natural Person
c/o 7050 W. Palmetto Park Rd, #15-287
Boca Raton, FL, 33433

Plaintiff,

v.

BARACK HUSSEIN OBAMA,
A Natural Person
Washington, D.C.

Defendant

Case No: _____

COMPLAINT

I. INTRODUCTION AND NATURE OF THE ACTION

1. This is a civil action for damages against Defendant Barack Obama (“Defendant Obama”) for Assault and Intentional Infliction of Emotional Distress based on Defendant Obama’s and his surrogates, agents and co-conspirators overt actions to incite violence and/or serious bodily harm stemming from President Donald Trump’s January 27, 2017 Executive Order titled *Protecting the Nation From Foreign Terrorist Entry into the United States* (the “Executive Order”).¹ The actions and/or omissions giving rise to Plaintiff Larry Klayman’s causes of action occurred within this judicial district, as set forth below, and were made by Defendant Obama as a private citizen. He thus has no possible claim of immunity from suit.

II. STANDING AND THE INDIVIDUAL PLAINTIFF PARTIES

2. Plaintiff Larry Klayman (“Plaintiff”) is a citizen of Florida. Plaintiff is a prominent public-interest attorney and advocate who has been vocal about his pro-Israel and

¹ Donald J. Trump, *Protecting the Nation From Foreign Terrorist Entry into the United States*, The White House, Jan. 27, 2017, available at: <https://www.whitehouse.gov/the-press-office/2017/01/27/executive-order-protecting-nation-foreign-terrorist-entry-united-states>

Zionist beliefs, has brought several high profile and widely publicized lawsuits against Muslim terrorists and terrorist interests and nations, including but not limited to (1) the Islamic Republic of Iran, (2) the “so-called” Ground Zero mosque in New York City, (3) the Islamic Society of North America, and (4) the Council for American-Islamic Relations (“CAIR”), who had been named as an indicted co-conspirator to terrorism in a federal criminal case concerning the Holy Land Foundation in the Northern District of Texas. Plaintiff has publically criticized Defendant Obama’s pro-Muslim, pro-radical Black leftist views and policies. Plaintiff has also brought suit against domestic as well as international terrorist groups² and Black Lives Matter, Louis Farrakhan and his Nation of Islam, Al Sharpton, and other radical Black leftist organizations, who have advocated and systematically practiced anti-Semitic and anti-Christian bigotry, and who have also advocated severely harming or killing law enforcement, and in fact have done so.³ As such, Plaintiff falls squarely within the zone of persons to be threatened with death and/or serious bodily harm as a result of his vocal and public criticism of, and legal action against, Defendant Obama’s pro-Muslim and pro-radical Black leftist views, policies and actions, as well as radical and hostile Muslims and their organizations such as the Council for American Islamic Relations (CAIR). Plaintiff, as a public figure and a in effect a law-enforcement officer as the founder of Judicial Watch and Freedom Watch and a former U.S. Department of Justice prosecutor, indeed fears for his life and safety as a result. Indeed, he was previously threatened by radical Islamic Imams and others, such as terrorist connected Imam Rauf, previously of the Ground Zero Mosque who issued what in effect is a Fatwa against him.

3. Defendant Obama is a citizen of the state of Illinois and, currently, a private citizen and resident in the District of Columbia.

² See *Strange v. Islamic Republic Of Iran*, 1:14-cv-435 (D.C. Dist.)

³ See *Pennie v. Farrakhan*, 3:16-cv-2010 (N.D. Tx.)

III. JURISDICTION AND VENUE

4. This Court has subject matter jurisdiction over this action based on diversity of citizenship pursuant to 28 U.S.C. § 1332(a)(2), because there is complete diversity of citizenship between the Plaintiff and the Defendants.

5. Defendant Obama is a citizen of Illinois.

6. The matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

7. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b)(2), as the cause of action primarily arose in this district.

IV. FACTS COMMON TO ALL COUNTS

8. Defendant Obama has engaged in a pattern and practice of “cleverly” inciting deadly violence and/or seriously bodily harm and injury through his actions, in concert with his surrogates, agents, and co-conspirators as set forth herein, with the intent to destabilize American society and reconstruct it according to their agendas.

9. Defendant Obama—working in concert with Black Lives Matter, Louis Farrakhan, Al Sharpton, George Soros, and others—has “cleverly” incited death and/or serious bodily harm against law enforcement officers, Caucasians, and Jews in support of the radical Black leftist, separatist, and black supremacy movements.

10. For instance, Al Sharpton, a degenerate and hate filled radical Black agitator, ironically not unlike his professed nemesis the bigoted Klu Klux Klan, who extorts money through race bating and hatred of law enforcement, whites and others, was invited by Defendant

and has visited with Defendant Obama seventy-three (73) times in the White House as of February 27, 2015.⁴ Incredibly, his visit in February 2015 was announced as:

The main topic discussed at the summit, according to the White house, was the presidential task force formed in response to violent clashes with police in Ferguson, Missouri, and New York sparked by the killings of Michael Brown and Eric Garner. ‘The president highlighted the upcoming release of the report by the Task Force on 21st Century Policing, and emphasized the work of the Task Force leading to the report’s creation,’ said the news release.

11. In one of Al Sharpton’s rallies that occurred on December 15, 2014 in New York City, marchers were chanting death threats to the police: **“What do we want? Dead cops! When do we want it! Now!”**⁵ The protesters event assaulted two NYPD officers and blocked traffic on the Brooklyn Bridge.⁶

12. In the video embedded below, Al Sharpton explicitly tells his followers to murder Caucasian law enforcement officers, saying, “I believe in offing the pigs. Well they got pigs out here. You ain’t offed one of them. What I believe in, I do.” Defendants Sharpton goes on to rant, “I’ll off the man. Well off them. Plenty of crackers walking right around here tonight.”⁷ He even urges his radical followers to commit acts of deadly violence against law enforcement, saying, “well fight then! Ain’t nobody holding you!”

⁴ Snejana Farberov, *Home is where the POTUS is: Al Sharpton returns to White House 'for his 73RD visit' with Obama to discuss problems facing minorities*, The Daily Mail, Feb. 27, 2015, available at: <http://www.dailymail.co.uk/news/article-2973067/Al-Sharpton-returns-White-House-73RD-visit-Obama-discuss-problems-facing-minorities.html#ixzz3mOt6XqXN>

⁵ *Obama, Holder, Sharpton Stoke Flames, Ferguson Officers Shot*, Breitbart, March 12, 2015,

⁶ Warner Todd Huston, *Al Sharpton Leads March in DC as NYC Protesters Chant: ‘What Do We Want? Dead Cops!’*, Breitbart, Dec. 13, 2014, available at: <http://www.breitbart.com/big-government/2014/12/13/al-sharpton-leads-thousands-in-saturday-march-on-washington-dc/>.

⁷ *Al Sharpton’s 1992 Off the Pigs Video*, Mar. 19, 2016, available at: <https://www.youtube.com/watch?v=XpZ0RwtvZmk> al s



13. Moreover, as disclosed by a former top deputy of the Louis Farrakhan of the hate filled Black Muslim Nation of Islam, Defendant Obama’s ties to the radical Black Muslim nationalist movement in Chicago run “deep,” and Louis Farrakhan and Defendant Obama have had “an open line between them” to discuss policy and strategy, either directly or through intermediaries.⁸

14. Louis Farrakhan endorsed Defendant Obama in a videotaped speech to his followers at his Mosque in Chicago in February. “You are the instruments that God is gonna use to bring about universal change, and that is why Barack has captured the youth,” Farrakhan said. He told the crowd that Obama was the new “messiah.”⁹

15. On June 24, 2015, appearing in the course of the same “Justice or Else! Tour” at the Metropolitan African Methodist Episcopal church in Washington DC, Louis Farrakhan gave an impassioned hate filled speech denouncing America¹⁰ and aligning all white Americans with the sentiments of the racist murderer in Charleston, South Carolina, Dylann Roof.¹¹

⁸ *Obama-Farrakhan Ties Are Close, Ex-Aide Says*, Newsmax, Nov. 3, 2008, available at: <http://www.newsmax.com/InsideCover/farrakhan-obama-islam/2008/11/03/id/326298/>

⁹ *Id.*

¹⁰ Gregory Tomlin, *Stalk them and kill them, Farrakhan says, calling for 10,000 volunteers to kill whites*, Christian Examiner, Aug. 5, 2015, available at <http://www.christianexaminer.com/article/farrakhan.calls.for.10000.volunteers.to.kill.whites/49329.htm>.

¹¹ Matthew Maule, *Farrakhan Exploits Charleston Tragedy*, June 30, 2015, <http://www.christianpost.com/news/farrakhan-exploits-charleston-tragedy-140998/#wwOk9TDoEa6wPVSr.99>.

16. In his speech, Louis Farrakhan explicitly called for murder, stating, “Retaliation is a prescription from God to calm the breasts of those whose children have been slain. So if the federal government will not intercede in our affairs, then we must rise up and kill those who kill us. Stalk them and kill them and let them feel the pain of death that we are feeling.”¹²

17. Moreover, on September 17, 2015, the Black Lives Matter leaders met in the White House with President Obama’s primary adviser, aide, and implementer Valerie Jarrett—who is of Iranian descent and Muslim—and other White House officials.¹³ According to news reports, participants included Black Lives Matter leaders Deray Mckesson and Johnetta Elzie. The topic of the White House meeting with Black Lives Matter and similar groups was mutual plans for “changing” official government policies, an guise and euphemism for threatening and harming and killing police officers and law enforcement.

18. Immediately after the Dallas Police Shooting in July, 2016, Defendant Obama met again with Black Lives Matter at the White House. At the conclusion of the meeting, Defendant Obama stated, “[w]e’re not at a point yet where communities of color feel confident that their police departments are serving them with dignity and respect and equality.”¹⁴ This statement was made to “cleverly” blame law enforcement officers for the Dallas Police Shooting, instead of holding the true culprits—radical leftist, separatist, and supremacy Black power groups—responsible.

19. On August 29, 2015, during a Black Lives Matter protest in Minnesota, protesters chanted in unison, **“Pigs in a blanket, fry em’ like bacon.”** The chant was clearly meant to promote and cause severe bodily injury or death among innocent police officers policers of all

¹² Tomlin, *supra* note 7.

¹³ Darren Sands, BuzzFeed, Sep. 17, 2015, available at: <http://www.buzzfeed.com/darrensands/black-lives-matter-activists-meet-with-white-house-officials#.utj953aVw>.

¹⁴ Theodore Schleifer, Allie Malloy, *Black Lives Matter Activists Join Obama at Forum on Policing*, CNN, July 14, 2016, available at: <http://www.cnn.com/2016/07/13/politics/obama-black-lives-matter-meeting/>

racess and ethnicities, who were, ironically, at the march to help protect the protestors' free speech.¹⁵

20. On July 7, 2016, Lakeem Keon Scott ("Scott") shot at passing cars along a Tennessee highway, killing one woman and wounding three others, including a police officer.¹⁶ Witnesses heard Scott yelling "police suck! Black lives matter!" as he opened fire.¹⁷ Police later on found "Black Lives Matter" materials inside of Scott's home.¹⁸ All of Scott's victims were Caucasian.¹⁹

21. Defendant Obama has publicly expressed his support for the violent actions of Black Lives Matter, Louis Farrkahan and the Nation of Islam, and others who have threatened to kill and have killed law enforcement and who oppose Black separatism and supremacy. Plaintiff Klayman, as a former U.S. Department of Justice prosecutor, founder of both Judicial Watch and Freedom Watch—both of which seek to enforce law and order throughout the nation and who legally represent law enforcement officers—and as an officer of the judicial system and courts himself, is part of the law enforcement community. Now, in an attempt to further his intent to destabilize American society and restore his agenda—in whole or in part—under the Trump presidency, which he vehemently opposed and continues to oppose, and then reconstruct it to his own design, Defendant Obama, working in concert with his surrogates, agents and co-conspirators has again "cleverly" attempted to incite violence and/or serious bodily harm with regard to the Executive Order which has been mischaracterized as a "Muslim ban" signed by

¹⁵ Bill Hudson, *Black Lives Matter Chant Called 'Disgusting' By Police Leader*, CBS Minnesota, Aug. 30, 2015, available at: <http://minnesota.cbslocal.com/2015/08/30/black-lives-matter-chant-called-disgusting-by-police-leader/>.

¹⁶ *Witness heard Bristol gunman yelling, 'Police suck! Black lives matter!' as he opened fire*, CNN Wire, July 8, 2016, available at: <http://wtvr.com/2016/07/08/bristol-gunman-lakeem-keon-scott-yelled-olice-suck-black-lives-matter/>.

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ Mark Heim, *Tennessee Highway Gunman Kills 1, Injures 3, Motivated by Police Shootings, Authorities Said*, AL, July 8, 2016, available at: http://www.al.com/news/index.ssf/2016/07/tennessee_highway_gunman_motiv.html

President Donald Trump on January 27, 2017. Defendant Obama is particularly aggressive, incensed and angry given that his endorsed presidential candidate in 2016, Hillary Clinton, who pledged to continue his agenda against law enforcement and who strongly supported the Black radical, separatist, and supremacy movements to win votes was defeated by now President Donald J. Trump on November 8, 2016.

22. Defendant Obama is now inciting his primarily Muslim supporters, in addition to his Black separatist and supremacist supporters, surrogates, agents and co-conspirators to commit and/or threaten acts of serious violence against persons, such as Plaintiff, who disagree with them and their actions to destabilize American society and then reconstruct it to their own design. Not coincidentally, the various radical leftist, separatist, and supremacist Black power groups that Defendant Obama has vocally supported have also now conveniently and tactically joined Defendant Obama's primarily Muslim supporters in "protesting" the Executive Order by effectively inciting acts and/or threats of serious violence and/or death. Since many of these Obama surrogates, agents, and co-conspirators are Black Muslims, there is a natural affinity between Muslims and radical Black separatists and supremacists who are viciously anti-Semitic, anti-Christian, anti-white and anti-law enforcement. Louis Farrakhan of the Nation of Islam is just one example among many.

23. The Executive Order temporarily suspended entry into the United States, as immigrants and nonimmigrants, of aliens from Iran, Iraq, Libya, Somalia, Sudan, Syria, and Yemen to temporarily reduce the investigative burdens on relevant agencies so that they may "immediately conduct a review to determine the information needed from any country to adjudicate any visa, admission, or other benefit under the INA (adjudications) in order to

determine that the individual seeking the benefit is who the individual claims to be and is not a security or public-safety threat.”²⁰

24. Seizing on an opportunity to “cleverly” incite violence and/or serious bodily harm in and to further his mission to destabilize American society and then reconstruct it to his own design, Defendant Obama, acting in concert with his surrogates, agents and co-conspirators has signaled and called for his surrogates, agents and co-conspirators and followers to “protest” and effectively commit acts of violence, serious bodily injury, or death against persons who happen to hold a differing viewpoint.

25. Through his spokesperson, Defendant Obama “cleverly” tweeted that he was “heartened” by the protests, and acts of serious violence, and that these “protests” are “exactly what we expect to see when American values are at stake.”²¹ He went on to tweet that the “fundamentally disagrees” with President Donald Trump’s Executive Order. Given his past status as President of the United States, this message was in effect a call to arms. This call to arms has also resulted in other violence, such as the destructive mob violence, arson and property destruction and vandalism which occurred and was witnessed just yesterday night February 1, 2017, on the campus of Berkeley University, again in California where Defendant Obama and his surrogates, agents, and co-conspirators have many ultra leftist, radical Black and Muslim and anarchist supporters and sympathizers. Obviously, a call to arms by and from an ex-President of the United States carries great weight with these persons, as he is in a position of “prestige” and persuasive power and influence. Defendant Obama thus gave a “green light” to the legally actionable conduct set forth herein, which is continuing,

²⁰ Trump, *supra* note 1.

²¹ Dan Merica, *Obama ‘Fundamentally Disagrees’ With Trump’s Immigration Order*, CNN, Jan. 30, 2017, available at: <http://www.cnn.com/2017/01/30/politics/obama-donald-trump-travel-ban-statement/index.html>.

26. As The Telegraph states, it is unprecedented for former presidents to criticise [sic] (and thus take shots at) their successors – and certainly not just a week and a half after they are sworn in.”²²

27. As a result of Defendant Obama’s acting in concert with his surrogates, agents, and co-conspirators to incite violence, serious bodily harm, or death, disingenuously couched as encouragement to “protest,” surrogates, agents and co-conspirators all over the nation—including but not limited to those in this judicial district—are, in fact, committing and/or inciting death and violence—particularly at restricted security airports which are subject to terrorist attacks—in order to destabilize American society and the Trump presidency, who they see as an opponent of their violent aim to force Black separatism and supremacy and radical Muslim agendas over the nation. Indeed, radical Blacks and Muslims, incited by Defendant Obama, have now clearly joined forces yet again, stoked by a Black Muslim hostile, separatist, and supremacist ideology which views other races, ethnicities and religions as inferior to, hostile against, and opposed to their agendas.

28. Recently, in Seattle, furthered by the actions of Defendant Obama, his surrogates, agents and co-conspirators, a Black Lives Matter activist ranted to a large crowd gathered in protest of the Executive Order, explicitly saying that “...**we need to start killing people.**”²³ She went on to expressly threaten and incite death to President Donald Trump, saying, “**First off, we need to start killing the White House. The White House must die.** The White House, your fucking White House, your fucking Presidents, they must go! Fuck the White House.”²⁴

²² Barney Henderson; Laura Hughes; Danny Boyle; Chris Graham, *Barack Obama Hits Out at Donald Trump, Warning ‘American Values’ Are at Stake*, *The Telegraph*, Jan. 31, 2017, available at: <http://www.telegraph.co.uk/news/2017/01/30/british-dual-citizens-will-now-allowed-travel-us-boris-johnson/>.

²³ Justin Caruso, *BLM Anti-Trump Protest in Seattle: ‘We Need to Start Killing People’*, *Daily Caller*, Jan. 30, 2017, available at: <http://dailycaller.com/2017/01/30/blm-anti-trump-protest-in-seattle-we-need-to-start-killing-people/>.

²⁴ *Id.*

29. Similarly, on January 31, 2017, the U.S. Capitol Police reported that 47 people were arrested for illegally protesting inside of a vulnerable and secure Senate office building. The protestors “blocked the hallway” near Senator Orrin Hatch’s office.²⁵ These threatening “protests” were carried out in furtherance of Defendant Obama, his surrogates, agents and co-conspirators incitement to do violence and to undermine the presidency of Donald Trump and to create chaos in American society to further their agendas.

30. Many of these highly threatening and potentially deadly “protests” have occurred in or around the nation’s airports, similar to the January 6, 2017 mass shooting at Fort Lauderdale International Airport, where five people were killed and six others seriously injured.²⁶ The alleged gunman, Esteban Santiago, was reportedly influenced by ISIS. Santiago, who had converted to Islam and became a Muslim, admitted to having Islamic “terroristic thoughts.”²⁷

31. Plaintiff himself has been the victim of Defendant Obama’s incitement, acting in concert with his surrogates, agents and co-conspirators to cause violence and/or death when he was threatened by a “protestor” in the vulnerable off limits baggage claim area at Los Angeles International Airport (LAX).

32. Specifically, on Sunday, January 29, 2017, while waiting for his baggage at LAX at approximately 8:40 P.M., Plaintiff was assaulted by a “protestor” in the baggage claim area of the Southwest Airlines terminal. The “protestor”, who had an Arabic accent and appeared to be of Islamic descent, was in effect wilfully and maliciously acting at the wilful and malicious

²⁵ *The Latest: Senate Panel Delays Vote on Budget Nominee*, AP, Jan. 31, 2017, available at: <https://www.yahoo.com/news/latest-senate-dem-leader-oppose-8-cabinet-nominees-181513245.html>.

²⁶ Merrit Kennedy, *Fort Lauderdale Airport Shooting Suspect Pleads Not Guilty to 22 Counts*, NPR, Jan. 30, 2017, available at: <http://www.npr.org/sections/thetwo-way/2017/01/30/512467241/fort-lauderdale-airport-shooting-suspect-pleads-not-guilty-to-22-counts>.

²⁷ *Id.*

direction of Defendant Obama, the former President of the United States, his surrogates', agents' and co-conspirators' mission to incite serious violence and/or death against those who oppose his mission to destabilize American Society and reconstruct it in his own image contrary to the professed agenda of the new Trump administration.

33. The "protestor," a female, violently lunged and charged at Plaintiff and others around him while carrying a large and physically and otherwise threatening sign, as Plaintiff and others in his vicinity were waiting for their baggage, while uncontrollably yelling and screaming over and over again in an extremely hostile and hugely frightening manner, at a high decibel pitch, "You are racists!"

34. Plaintiff suffered great fear of imminent and severe bodily harm or death, given the recent Muslim ISIS inspired attack at Ft. Lauderdale International Airport baggage claim, as Plaintiff believed at that moment that he was amidst and targeted by another terrorist attack, similar to the Fort Lauderdale shootings on January 6, 2017.

35. Plaintiff is a prominent public interest lawyer and a public figure, who is within the zone of persons to be threatened by Defendant Obama, his surrogates, agents and co-conspirators and his followers who respond to and obey Defendant Obama's and his surrogates, agents, and co-conspirators' incitement to violence against those who differ from pro-radical Black and Muslim agendas. It is no coincidence that Defendant Obama is in part of Black and Muslim heritage, while misleadingly claiming in order to be elected as president to be a died in the wool Christian. Indeed, Plaintiff Klayman has tongue in cheek parodied Obama's claim of being a Christian, asking in a widely publicized speech at the World War II Memorial in Washington, D.C., that he get up off his knees, put the Quran down and figuratively come out (of the White House) with his hands up, given his latent anti-Semitic and anti-Israeli policies and

refusal to call Islamic terrorism other than “workplace violence” and other deceptive subterfuges, among a myriad of other indicia that at heart Defendant Obama sees himself as primarily Muslim. Plaintiff Klayman is considered to be an ideological foe of Defendant Obama and his discriminatory radical Black and Muslim agenda against law enforcement and others who oppose him. Plaintiff has put the Mayor of Los Angeles and the Los Angeles World Airports on notice to preserve surveillance videos and other evidence of the Defendant Obama and his surrogates, agents and co-conspirators provoked assault which occurred in the baggage claim area of Southwest Airlines and when Plaintiff discovers the identity of the person of apparent Muslim descent who carried out the assault, “cleverly” wilfully and maliciously incited by and called for Defendant Obama and his surrogates, agents and co-conspirators, she will be added as a defendant to this action. See Exhibit 1 which is incorporated herein by reference.

36. Defendant Obama has, conspicuously, not disavowed the acts and threats of serious violence carried out in response to his incitements.

37. Defendant Obama and Black Lives Matter and radical Muslims and Islamic groups, such as CAIR, who had been and continue to “work” with him in concert to incite death and/or serious bodily harm against law enforcement officers, Jews, and Caucasians, are now “working” in concert with the “protestors,” incited by Defendant Obama, his surrogates, agents and co-conspirators, only a portion of which are set forth throughout this complaint. Defendant Obama and those surrogates, agents, and co-conspirators oppose President Donald Trump’s Executive Order in order to further their plan to delegitimize President Trump and destabilize American society in order to rebuild it pursuant to their agendas.

V. CAUSES OF ACTION

FIRST CAUSE OF ACTION

Assault

38. Plaintiff repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein.

39. Defendant Obama, himself and by and through his surrogates, agents and co-conspirators as set forth above, has wilfully and maliciously placed Plaintiff in apprehension of an imminent harmful or offensive contact resulting in serious bodily injury or death.

40. The Muslim “protestor,” acting under the direction of Defendant Obama, and in furtherance of Defendant Obama’s and his surrogates, agents and co-conspirators’ willful and malicious incitement to violence and/or death, acting in concert, threatened Plaintiff, who was placed in fear of imminent severe physical bodily harm and/or death.

41. Defendant Obama’s acts, acting in concert with his surrogates, agents and co-conspirators of inciting, promoting and/or carrying out actions of violence against those who have differing opinions and have taken legal actions to try and thwart their hate-filled agendas, such as Plaintiff, were done with the intent to knowingly and purposefully place the Plaintiffs in fear of immediate and imminent severe bodily injury, physical danger, attacks, and/or execution, assassination, or death.

42. As a direct, foreseeable and proximate result of the conduct of Defendant Obama, his surrogates, agents and co-conspirators, Plaintiff has suffered non-pecuniary damages in amounts to be proven at trial.

43. By reason of the wrongful conduct of Defendant Obama and his surrogates, agents and co-conspirators, acting in concert, Plaintiff has suffered conscious pain, suffering, severe emotional distress and the fear of imminent serious bodily injury or death, and have suffered pecuniary and economic damage, loss of support, loss of nurture, care and guidance,

emotional distress, grief, anguish, loss of services, loss of society, and other mental and physical injuries.

SECOND CAUSE OF ACTION
Intentional Infliction of Emotional Distress

44. Plaintiff repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein.

45. Defendant Obama's acts, in concert with his surrogates, agents and co-conspirators of inciting and/or carrying out actions of violence, as set forth herein against Plaintiff and those in his vicinity in the baggage claim area of Southwest Airlines at LAX were done with the intent to terrorize, threaten, intimidate, and frighten Plaintiff and those similarly situated, as well as to actually commit acts of violence against them.

46. Defendant Obama's acts, in concert with his surrogates, agents and co-conspirators of inciting, promoting and/or carrying out actions of violence were willful, malicious, deliberate, or were done with reckless indifference to the likelihood that such behavior would cause severe emotional distress and with utter disregard for the consequences of such actions.

47. The acts of violence and murder set forth herein were committed with the knowledge of and intention to cause extreme physical pain and suffering to any and all persons within close proximity of the attack and extreme emotional distress to the Plaintiff and others similarly situated who oppose Defendant Obama and his surrogates, agents, and co-conspirators discriminatory and harmful radical Black and pro-Muslim agendas and goals, or were done with reckless indifference to the likelihood that such behavior would cause such severe emotional distress and with utter disregard for the consequences of such actions.

48. Defendant Obama's, acting in concert with his surrogates, agents and co-conspirators conduct was unreasonable and outrageous and exceeds the bounds usually tolerated by decent society, and was done willfully, maliciously and deliberately, or with reckless indifference, to cause Plaintiff and others similarly situated with severe mental and emotional pain, distress, and anguish and loss of enjoyment of life.

49. By reason of the wrongful conduct of Defendant Obama and those surrogates, agents and co-conspirators acting in concert with him, Plaintiff has suffered conscious pain, suffering, severe emotional distress and the fear of imminent serious bodily injury or death, and have suffered pecuniary and economic damage, loss of support, loss of nurture, care and guidance, grief, anguish, loss of services, loss of society, and other mental and physical injuries.

50. Defendant Obama, acting in concert with his surrogates, agents and co-conspirators undertook his actions willfully, wantonly, maliciously and with reckless disregard for Plaintiff's rights, and as a direct, foreseeable, and proximate result thereof plaintiffs suffered economic and emotional damage in a total amount to be proven at trial. Plaintiff also seeks punitive damages in an amount sufficient to deter Defendant Obama and his surrogates, agents, and co-conspirators from similar future wrongful conduct.

PRAYER FOR RELIEF

Plaintiffs demands that judgment be entered against Defendant Obama for compensatory and actual damages because of their demonstrable physical and emotional injury to Plaintiff, punitive damages because of Defendant Obama's callous and reckless indifference and malicious acts, and attorney's fees, costs, an award in excess of \$3,450,000 million USD, punitive damages based at least on 5% of Defendant Obama's considerable net worth which is reported and predicted soon to be in the hundreds of millions of U.S. dollars, to prevent his "clever and

opportune” malicious incitement to violence and illegal actions from reoccurring , and such other relief the Court may deem just and proper.

JURY DEMAND

Plaintiff respectfully demands a jury trial on all issues so triable.

Dated: February 2, 2017

Respectfully submitted,

/s/ Larry Klayman

Larry Klayman, Esq.

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Plaintiff Pro Se

EXHIBIT 1

February 2, 2017

VIA FEDERAL EXPRESS

Los Angeles World Airports
1World Way
Los Angeles, CA, 90045

Office of Mayor Eric Garcetti
200 N. Spring St.
Los Angeles, CA, 90012

Re: Assault of January 29, 2017

To Whom it May Concern:

This letter is in reference to an incident and assault that occurred at Los Angeles International Airport on January 29, 2017, at approximately 8:30 P.M. Larry Klayman ("Klayman") was assaulted by a "so called" protestor who LAWA and other appropriate authorities intentionally, or negligently and recklessly allowed to be present at the scene. This occurred while Klayman was awaiting his baggage in the Southwest Airlines Terminal baggage claim area for a flight from Sacramento, California on Southwest Flight 5336. *See* attached. The so-called "protestor", who appeared to be Muslim and spoke with an Arabic accent, charged at Klayman and screamed at him and others in his vicinity, placing Klayman in immediate apprehension of serious bodily harm and death (the "Incident"), particularly given a recent Muslim and ISIS inspired terrorist attack in the baggage claim area at Fort Lauderdale Airport, which left at least 5 persons dead and many more critically injured.

Request and Duty to Preserve Evidence

Let this letter serve as notice that we are requesting that Los Angeles World Airports ("LAWA") and Mayor Eric Garcetti ("Mr. Garcetti") and his office preserve any and all evidence that may potentially be relevant and discoverable in this matter should Mr. Klayman's claims proceed to litigation. Particularly, electronically stored information may potentially become an important and irreplaceable source of discovery and/or evidence related to the claims and concerns raised. In order to ensure that this information is available for later use and review, we respectfully remind you of the importance of preserving electronic data once the company has been placed on notice. *Penn v. Prestige Stations, Inc.* (2000) 83 Cal.App.4th 336, 343; *Linnen v. A.H Robins Company Inc.* (Mass. 1999) 10 Mass. L. Rptr. 189.

A potential defendant has an obligation to begin preserving potentially relevant evidence when litigation is reasonably foreseeable. The purpose of this letter is to inform you that litigation is being contemplated. Because of its format, electronically stored information is easily deleted, modified and/or corrupted. Despite this type of information's pliable nature, the laws and rules prohibiting destruction of other forms of evidence apply with equal effect to electronically stored information. While the destruction of data may occur routinely in the regular course of

business, selective destruction of data may generate suspicion and may - depending on the circumstances - constitute spoliation of evidence. Monetary damages, as well as "adverse inference" jury instructions are just two of the potential sanctions for destruction of evidence.

Allow this letter to serve as notice that the LAWA and Mr. Garcetti and his office should preserve all data and information related to the Incident, including but not limited to any and all video, audio, or other recording or evidence relating to the above-mentioned assault which occurred between the hours of 8:00 P.M. and 9:00 P.M on January 29, 2017 in the baggage claim area of the Southwest Airlines terminal, any reports made by any party concerning the Incident, and any communications regarding the decision to allow so-called "protestors" to protest and disturb the peace on secure and local, state, and federally protected LAX grounds and premises. Please contact me with any questions.

Sincerely,



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