

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RAVI ZACHARIAS,)	
)	
Plaintiff,)	CIVIL ACTION FILE NO.:
)	17-cv-02885-LMM
v.)	
)	
BRADLEY THOMPSON and LORI)	
ANNE THOMPSON,)	JURY TRIAL DEMANDED
)	
Defendants.)	
)	

FIRST AMENDED COMPLAINT

Pursuant to the Federal Rules of Civil Procedure, including Rule 15, Plaintiff Ravi Zacharias hereby files this First Amended Complaint to correct certain typographical errors in his original Complaint:

INTRODUCTION

1. This is an action arising out of a scheme by Defendants to attempt to extort money from Plaintiff, a prominent lecturer, speaker, and author on Christianity. Conspiring together, Defendants labored relentlessly to foster a relationship with Plaintiff in hopes of manipulating him into a compromising position. When that failed – because Plaintiff avoided even meeting with Defendants in private – Defendants resorted to simply plying Plaintiff with

electronic messages containing unwanted, offensive, sexually explicit language and photographs. Then, falsely representing that Plaintiff had solicited those materials – when in fact he repeatedly asked that Defendants stop sending them and even set his account to block further messages – Defendants began making extortionate demands – insisting on an exorbitant payment or else they would use the materials and their lies about the materials to damage Plaintiff’s family, reputation, and career.

2. More specifically, Defendants attempted to coax Plaintiff into meeting Defendant Lori Anne Thompson privately and/or into inappropriate online activity with Ms. Thompson, so that they could portray an inappropriate relationship with Ms. Thompson. Defendants hoped they could use evidence of this to threaten disclosure of such relationship unless Plaintiff paid Defendants a substantial sum of money. These attempts did not work. Plaintiff never met Ms. Thompson privately and never solicited any inappropriate online activity with Ms. Thompson. Nevertheless, Defendants repeatedly sent unsolicited and unwanted messages to Plaintiff, including sexually explicit photographs and messages and extortionate communications, called Plaintiff, and, on at least one occasion, showed up at Plaintiff’s place of business, appeared outside Plaintiff’s home, and contacted Plaintiff’s daughter.

3. Through the design and execution of their scheme, Defendants have engaged in numerous wrongful and tortious acts, displaying rank bad faith, and Plaintiff has suffered and continues to suffer harm as a result.

PARTIES

4. Plaintiff is an individual who resides in Alpharetta, Georgia.

5. Defendant Bradley Thompson is an individual who resides in Belleville, Ontario, Canada. Service may be made on Mr. Thompson by personally serving him at 168 Sunrise Drive, RR#7, Bellville, Ontario K8N 4Z7, Canada.

6. Defendant Lori Anne Thompson is an individual who also resides in Bellville, Ontario, Canada. Service may be made on Ms. Thompson by personally serving her at 168 Sunrise Drive, RR#7, Bellville, Ontario K8N 4Z7, Canada.

JURISDICTION

7. Pursuant to 28 U.S.C. § 1332, this Court has subject matter jurisdiction over this dispute because the matter in controversy exceeds \$75,000.00 in value, exclusive of interest and costs, and there is complete diversity of citizenship between Plaintiff and Defendants.

8. Pursuant to 28 U.S.C. § 1331, this Court has subject matter jurisdiction over this dispute because the matter in controversy exceeds \$75,000.00

in value, exclusive of interest and costs, and this is an action that arises under the laws of the United States.

9. Defendants are subject to personal jurisdiction in Georgia because, among other things, and as shown herein, (i) they have committed a tortious act within this state, and (ii) they have committed tortious injury in this state and have engaged in a persistent course of conduct within this state.

VENUE

10. Pursuant to 28 U.S.C. § 1391, venue is proper in the Northern District of Georgia since a substantial part of the events or omissions giving rise to the claims occurred within this District, and since Defendants are not residents in the United States.

FACTUAL ALLEGATIONS

Plaintiff's Work and Ravi Zacharias International Ministries

11. Plaintiff is a prominent lecturer, speaker, and author, and is the founder and president of Ravi Zacharias International Ministries ("RZIM").

12. RZIM is an interdenominational ministry that has existed for 33 years, with offices around the world, and is a Section 501(c)(3) organization under the U.S. Internal Revenue Code that was founded for the purpose of presenting

Biblical truth on a worldwide basis, with an emphasis on, among other things, evangelism and providing humanitarian aid to those at risk within a society.

13. RZIM is classified as a publicly supported organization, and such support is contributed mainly by interested individuals, churches, foundations and, to a lesser extent, through the sale of Ministry-produced materials, such as seminar programs, books, and radio programs.

14. RZIM is not a church and does not provide formal counseling services, therapy, or any other type of professional advice to non-employees.

15. In pursuit of RZIM's purpose, Plaintiff has authored over twenty-five books, spoken all over the world, including at prominent universities, and has been consulted by U.S. Congressmen, Governors, and other world leaders.

16. Indeed, Plaintiff's success, as well as RZIM's success, is due to Plaintiff's reputation as an astute and articulate defender of Christianity, and as a person of great spiritual and intellectual integrity.

17. Plaintiff is not a counselor, therapist, or pastor, and he does not operate a church.

Defendants' Scheme and Conspiracy to Extort Money from Plaintiff

18. Prior to their current scheme, on at least one other occasion, the Thompsons have sought a sum of money from an individual whose employment

related to espousing Christian faith. Specifically, in 2008, Mr. Thompson filed a lawsuit against a pastor and a church, seeking damages based on allegations that the pastor used his religious position to coerce Mr. Thompson into making certain ill-advised loans and investments.

19. On information and belief, the 2008 lawsuit was dismissed in 2010 after the parties entered into a settlement.

20. On information and belief, sometime after the settlement, the Thompsons began experiencing significant financial distress.

21. As part of the current scheme, Defendants decided that evidence depicting an inappropriate relationship (in person, online, or otherwise) between Ms. Thompson and a prominent, pious individual like Plaintiff would enable them to force the individual to pay an exorbitant sum of money under the threat of the disclosure of such relationship to the individual's employer, wife, and the public.

22. On or about October 3, 2014, Plaintiff spoke in Kingston, Ontario, Canada at a conference that the Thompsons attended.

23. As is often the case, after Plaintiff spoke, numerous conference attendees, including the Thompsons, approached Plaintiff to discuss various topics, to take photographs, or to simply meet Plaintiff. The Thompsons, however, waited until almost all other attendees had left.

24. Among the attendees that approached Plaintiff, the Thompsons were unusually furtive in their attempt to meet and maintain a conversation with Plaintiff.

25. Ms. Thompson asked Plaintiff to reach out to her husband with more information about RZIM and its mission. Following his usual practice, Plaintiff reached out to certain attendees, including Mr. Thompson, who had expressed an interest in learning more about RZIM and its mission. Plaintiff sent an e-mail to Mr. Thompson, in which Plaintiff told Mr. Thompson he was sending a book and asked Mr. Thompson if he would consider attending one of RZIM's educational programs.

26. At no point during these initial discussions or any time after did either of the Thompsons ask for, receive or inquire about formal counseling services from Plaintiff. Indeed, Plaintiff is not a counselor, therapist, or pastor and does not provide any type of professional treatment or counseling.

27. Sometime after the parties' initial meeting at the conference in Kingston, the Thompsons attended another event at which Plaintiff spoke in Toronto.

28. During that event, Ms. Thompson found Plaintiff's daughter, and began asking her intrusive questions about, among other things, Plaintiff's

daughter's recent divorce. Plaintiff's daughter was offended and considered Ms. Thompson's behavior and demeanor to be aggressive and disturbing.

29. The Thompsons again approached Plaintiff and, this time, asked if he would attend dinner with them. Plaintiff agreed, and the Thompsons, Plaintiff, and Plaintiff's wife attended a dinner at a restaurant in or near Toronto. After the dinner, Plaintiff's wife said that she felt "uneasy" about the Thompsons.

30. The dinner in Toronto was the last time Plaintiff had a substantive face-to-face communication with the Thompsons.

31. Plaintiff expected to hear again from Mr. Thompson about his interest in RZIM and its mission. Plaintiff believed that Mr. Thompson was interested in becoming a supporter of RZIM. Instead, Ms. Thompson reached out to Plaintiff and the two engaged in a friendly correspondence.

32. Like many other fans and friends of Plaintiff, Ms. Thompson reached out to Plaintiff via e-mail over the next year to pray, and discuss issues like health and wellbeing. In particular, Ms. Thompson represented that she was a physiotherapist and/or an ergonomist and provided advice about his back pain. Plaintiff has had two major back surgeries, and his back pain was something that he had publicly spoken about and is found in writings publicly available online.

33. As is typical with some e-mail messages from fans and supporters, including Ms. Thompson, Plaintiff was unable to respond due to time constraints and, when he did, often did not recall who the sender was (or if he had ever met the sender at all) and simply responded with a short, friendly response.

34. Plaintiff often was brief in his response to Ms. Thompson. He thanked her for her prayers and appreciated her kindness, but he did not understand the motivation behind her messages. Ms. Thompson suggested she might support RZIM monetarily, but Defendants never donated to or otherwise supported RZIM monetarily.

35. As part of Defendants' scheme, however, the Thompsons were relentless in their quest to get Plaintiff's attention and implant Ms. Thompson into his life. Ms. Thompson repeatedly contacted Plaintiff. As a result of Ms. Thompson's repeated messages, Plaintiff began to consider Ms. Thompson as a friend, in addition to a fan and supporter of RZIM's mission and Plaintiff's work.

36. As Plaintiff does with colleagues, certain friends and family members with whom he engages in more substantive communications, Plaintiff asked Ms. Thompson that she communicate with him via private BlackBerry Messenger ("BBM")—a more secure method of communication than e-mail given its superior security and encryption capabilities.

37. Plaintiff uses BBM's secure method of communication because, in the course of his work, he frequently travels to countries in the Middle East and other parts of the world with leaders or groups that are hostile to Christianity and, specifically, to Plaintiff. Plaintiff frequently receives death threats originating from these countries and, further, his electronic devices and online accounts have been the target of many hacking attempts. Additionally, his mobile phone has been taken and briefly held by local authorities on a few occasions when visiting Islamic countries.

38. During this period, Plaintiff discussed the same topics with Ms. Thompson that he discussed with other friends and fans: work, spirituality, family, books, and authors. At no point did Ms. Thompson ask for, receive, or inquire about receiving spiritual or marital counseling or therapy. Indeed, Plaintiff does not provide such formal counseling or therapy to anyone.

39. Over the course of the two years following their initial meeting, however, Ms. Thompson attempted to escalate her relationship with Plaintiff—through repeated and persistent BBM messages, e-mails, by sending gifts through the mail, and by traveling from Canada to Georgia on two occasions, but Plaintiff did not meet her in person.

Defendants' Attempts to Coax Plaintiff into Meeting Ms. Thompson Privately

40. In December 2015, Ms. Thompson obtained Plaintiff's home address under the guise of sending him a Christmas gift.

41. Sometime thereafter, Ms. Thompson traveled to Georgia. She visited RZIM's office and asked Plaintiff's assistant for a tour of the office. Additionally, Ms. Thompson drove to and appeared outside Plaintiff's home. Plaintiff, having been informed of her visit, intentionally left the area to avoid contact with Ms. Thompson.

42. Plaintiff was not in the area when Ms. Thompson visited and purposefully avoided meeting Ms. Thompson.

43. Plaintiff found Ms. Thompson's visit to Georgia strange at the time, but he convinced himself that her actions were those of an enthusiastic fan and supporter of RZIM's mission, or of a misguided friend. In particular, Plaintiff found Ms. Thompson's visit to his neighborhood and her surveying of his home to be very troubling.

44. On one visit to Georgia, Ms. Thompson unsuccessfully attempted to contact one of Plaintiff's daughters.

45. Ms. Thompson attempted to meet Plaintiff on other occasions as well, but Plaintiff rebuffed all of these attempts. For example, Ms. Thompson

represented that she was a physiotherapist and/or an ergonomist and volunteered to meet Plaintiff and treat his back pain.

46. Plaintiff rejected Ms. Thompson's offers to meet in order to treat his back pain.

47. Ms. Thompson also asked if she could accompany Plaintiff on one of his ministry trips to India, a request he did not entertain.

48. Plaintiff never had any inappropriate physical contact with Ms. Thompson. In fact, Plaintiff never met Ms. Thompson privately.

49. Defendants failed to coax Plaintiff into meeting with Ms. Thompson privately so that they could use such meeting as part of their scheme to extort money from Plaintiff.

Defendants' Attempts to Coax Plaintiff into an Inappropriate Online Relationship

50. Recognizing that they would be unable to persuade Plaintiff to meet Ms. Thompson privately, Defendants attempted to coax Plaintiff into an inappropriate online relationship with Ms. Thompson.

51. To do this, Ms. Thompson, at all times without Plaintiff's solicitation, gradually introduced inappropriate topics into conversations with Plaintiff, and then eventually introduced sexual topics. For example, she began expressing her love for Plaintiff, and then began making sexually suggestive statements.

52. At no point did Plaintiff initiate or solicit any lewd or inappropriate discussions. Such discussions were entirely one-sided (by Ms. Thompson) and unwanted by Plaintiff.

53. In or around February 2016, Ms. Thompson began sending innocuous photographs of herself and family via e-mail and BBM, but eventually began sending sexually explicit photographs through BBM.

54. For example, at first, Ms. Thompson sent photographs of herself with her family and pet, but as time went by, she sent photographs of herself stretching and in very scanty clothing and suggestive positions under the guise that these were exercises that would help Plaintiff's back, and then she began sending photographs with less clothing, and ultimately in the nude. Ms. Thompson took these photographs in her office, car, and home.

55. At no point did Plaintiff solicit or ask for any inappropriate photographs. Furthermore, Plaintiff never sent to Ms. Thompson any inappropriate photographs of himself.

56. In fact, Plaintiff asked Ms. Thompson to stop sending him inappropriate material.

57. Ms. Thompson agreed to stop sending Plaintiff such material, but then began sending photographs again and told Plaintiff that she could not help herself.

58. When Plaintiff blocked and/or directed Ms. Thompson's BBM messages to his spam folder, Ms. Thompson created new BBM identification numbers and continued to send inappropriate photographs and messages. Additionally, on at least two occasions, Plaintiff rejected Ms. Thompson's online request for further BBM chats.

Defendants' Attempts to Extract Damaging Statements from Plaintiff

59. As a result of Ms. Thompson's inappropriate messages and her failure to stop sending such messages when asked, Plaintiff sought to end his "friendship" with Ms. Thompson.

60. Recognizing that they would be unable to persuade Plaintiff to engage in any inappropriate behavior, as part of their scheme, Defendants decided to become confrontational with Plaintiff to attempt to extract damaging statements that could support their extortion scheme.

61. Specifically, on or about October 29, 2016, weeks after Plaintiff had cut off all contact with Ms. Thompson, Ms. Thompson e-mailed Plaintiff to inform him that she planned to tell her husband about the inappropriate messages she had sent Plaintiff. She further told Plaintiff that her husband had a bad temper. She had given examples of his violent temper before.

62. Additionally, in an obvious attempt to extract statements from Plaintiff that could be spun as an apology or admission for wrongful acts (that could, in turn, be used to extort money from Plaintiff), Ms. Thompson asked Plaintiff “how could [he] a 70-year-old man ask [] a mother of four to take [her] clothes off?”

63. Plaintiff was surprised by Ms. Thompson’s e-mail because all inappropriate photographs and messages had been one-sided and he had repeatedly blocked Ms. Thompson and asked her to stop contacting him.

64. Additionally, Plaintiff, who was worried about his physical well-being and his reputation being unfairly tarnished, pleaded with Ms. Thompson not to escalate the situation. Ms. Thompson’s tone had moved from affectionate adulation to contemptible accusation based upon groundless accusations.

65. In response, individuals (who identified themselves as “counsellors”) sent the following e-mail from Ms. Thompson’s e-mail address (loriannethompson@icloud.com):

We are Lori Anne’s counsellors and she is currently receiving intensive counselling with us to find healing and restoration for her marriage. It is not her intent to share what has happened to anyone except her husband—which is necessary for any hope of marital restoration. And we are bound by confidentiality. We need assurance from you that you will not harm yourself. Otherwise, we will find it necessary to contact 911 in your location. We await your prompt response. Thank you.

66. On information and belief, the above e-mail was not written by a counselor but, instead, by the Thompsons or some other third-party that conspired with the Thompsons as part of the scheme to extort money from Plaintiff.

67. Plaintiff continued to distance himself from the Thompsons but remained amicable out of fear for his family's safety and of potential damage to his professional reputation if he upset the Thompsons.

68. On or about November 16, 2016, however, Plaintiff received a text message from Ms. Thompson's phone number that simply asked, "Apology?"

69. Shortly thereafter, Plaintiff received an e-mail from Mr. Thompson:

That was me not Lori Anne who texted you "Apology?" I thought you would have canceled your email account or might not respond to me.

I should have put my name on the email so you would not think it was her. I apologize. She has turned over all controls of internet access and email accounts to me.

We are devastated but have reached out to get some help to try to recover. Which we will do. I hope you can too.

70. On information and belief, in attempting to conduct their scheme, Defendants mistakenly sent the "Apology?" text message from Ms. Thompson's phone, instead of from Mr. Thompson's phone. Mr. Thompson's follow-up e-mail was an attempt to cover up the mistake.

71. As part of their scheme, Defendants began sending a series of e-mails that were blatant attempts to extract statements from Plaintiff that could be misconstrued as an apology or admission for wrongful acts and thus used to extort money from Plaintiff.

72. For example, Mr. Thompson told Plaintiff that he had “forgiven” Plaintiff (despite the fact that Plaintiff had not asked for forgiveness) and, on December 5, 2016, Mr. Thompson sent Plaintiff an e-mail that stated, in part:

I am looking for assurance that the photos that were sent to you by Lori Anne where she was clothed and nude are no longer in your possession and have been destroyed.

73. Similarly, on January 19, 2017, Mr. Thompson sent Plaintiff an e-mail that stated, in part:

Lori Anne and I are continuing to receive counseling as we work to repair our marriage from everything that happened with you last year. One of the things the counselor has emphasized is my need to forgive you. I was very relieved to see your response about no longer possessing the photos of Lori Anne...thank you. I guess one of the remaining roadblocks for me is simply trying to understand why you would ask her to send you photos of herself? It seems like at some point that you may have been simply using her as merely an object to satisfy your own sexual urges. That is what makes me most angry and what I struggle with most when it comes to forgiving you. If you can help me understand what you were thinking and why you did this I think it help me [sic] come to terms with forgiving you and finally put this difficult season behind me. Thank you.

(Emphasis added).

74. At the time, Plaintiff was very busy traveling internationally for business, and he believed that a forgiving and humble approach to their messages would move the matter towards a peaceful and amicable resolution. Among other things, Plaintiff offered to destroy his phone to ensure any inappropriate material would be deleted.

75. Despite Defendants' attempts to get him to do so, Plaintiff never admitted that he solicited any inappropriate photographs or discussions. In fact, he denied that he had any role in soliciting such material. Specifically, on January 24, 2017 (Plaintiff's last direct communication with the Thompsons), Plaintiff sent an e-mail to Mr. Thompson that stated, in part:

Let me answer your question as best as I can without risk of seeming to avoid the full force of the responsibility. Whatever the reason the blame is real and inescapable. But to answer your question—I can say from my conscious that I never initiated or proposed that action Once that came about I can also say that I repeatedly made every effort not let [sic] it continue and suggested that I even block my mail, which I did. Each time I asked for no further contact, agreement was made [sic], and never once did I ever initiate it again By the way, with the determination to not continue what was wrong, I purposely never met her even once. When she paid a visit to Atlanta for other reasons, I deliberately was out of town

The Extortion Letter

76. Defendants were unable to coax Plaintiff into meeting Ms. Thompson alone or to engage in an inappropriate online relationship. Armed only with Plaintiff's vague statements in response to Defendants' attempts to extract admissions and/or damaging statements, the Thompsons, by and through their counsel, delivered an extortion letter to Plaintiff, dated April 26, 2017 (the "Extortion Letter"). Attached hereto as **Exhibit 1** is a true and correct copy of the Extortion Letter.

77. The gravamen of the Extortion Letter was to falsely assert that Plaintiff breached a confidential relationship with Ms. Thompson, and if Plaintiff failed to pay \$5 million dollars, Defendants would, among other things, notify Plaintiff's employer and family, and make certain communications and false information public by filing a complaint against Plaintiff.

78. The Extortion Letter alleged that Plaintiff used his "excellent grooming skills . . . to exploit [Ms. Thompson's] vulnerability to satisfy [Plaintiff's] own sexual desires" by "engag[ing] in explicit online conversations" and "solicit[ing] . . . many indecent photos of Lori Anne."

79. The Extortion Letter then stated, in part:

Mr. Zacharias, we can proceed with this matter in either of two ways:

1. You can notify your Board of Directors and all of your insurance carriers for your ministry, your professional coverage and your homeowners insurance of pending litigation. If that is the path you choose, you are hereby on notice as of this date to take affirmative steps to prevent anyone with access to your data, systems and archives from seeking to modify, destroy or hide electronic evidence our client, Lori Anne Thompson, while under your guidance and at your request provided you with multiple images of herself in the nude, the receipt of which you have acknowledged in communications which we possess
2. In the alternative of protracted and public litigation, the Thompsons will sign a release of you and your church and ministry in exchange for a certified check in the amount of \$5 million dollars made payable to the Bryant Law Center, Lori Anne Thompson and Bradley Thompson within thirty days of today's date, and mailed to the above address. DO NOT contact or attempt to contact my clients. I will not talk to you but will speak to your attorney should he wish to call me.

I trust you will govern yourself accordingly.

(Emphasis added).

80. Plaintiff's wife and daughter, among others, serve on RZIM's Board of Directors. Thus, the Extortion Letter, in effect, threatened disclosure of these accusations to Plaintiff's wife and daughter, among others, and to the public, unless Plaintiff paid Defendants \$5 million.

81. RZIM's Board of Directors has never been notified by anyone about any alleged misbehavior by Plaintiff. In fact, Plaintiff has never engaged in any misbehavior of the sort alleged in the Extortion Letter or through Defendants' scheme.

82. After receiving the Extortion Letter, Plaintiff immediately informed RZIM's Governance Committee and engaged counsel to represent and advise him in relation to this matter. Nevertheless, Defendants persisted in their scheme to extort money from Plaintiff.

83. Through the design and execution of their scheme, Defendants have engaged in numerous wrongful and tortious acts and in rank bad faith.

84. As a result of Defendants' wrongful conduct, Plaintiff has suffered and continues to suffer harm.

COUNT ONE
REQUEST FOR DECLARATORY JUDGMENT

85. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 84 of this Complaint as if fully set forth herein.

86. An actual, present, and justiciable controversy of sufficient immediacy has arisen and now exists between Plaintiff and Defendants concerning the legal obligations owed, if any, by Plaintiff—specifically, whether there existed a confidential and/or fiduciary relationship between Ms. Thompson and Plaintiff

and, if so, whether Plaintiff breached such confidential and/or fiduciary relationship.

87. Defendants contend, and Plaintiff disputes, that the parties established a confidential and/or fiduciary relationship.

88. To the extent there was a confidential and/or fiduciary relationship, Defendants contend, and Plaintiff disputes, that Plaintiff breached such a relationship.

89. A judicial declaration regarding these issues is necessary and appropriate so that Plaintiff may ascertain and effectively enforce his rights and may be protected from uncertainty with regard to the propriety of Plaintiff's conduct.

90. Accordingly, under 28 U.S.C. § 2201, Plaintiff requests that the Court issue a declaratory judgment expressly holding that (1) that there was no confidential and/or fiduciary relationship between Ms. Thompson and Plaintiff; or, alternatively, (2) there was a confidential and/or fiduciary relationship between Ms. Thompson and Plaintiff, but Plaintiff never breached such relationship.

COUNT TWO
**CONSPIRACY TO VIOLATE THE RACKETEER INFLUENCED AND
CORRUPT ORGANIZATION ACT, 18 U.S.C. § 1962 & 18 U.S.C. 1961**

91. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 90 of this Complaint as if fully set forth herein.

92. The Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1962(d), prohibits a conspiracy among persons employed by or associated with any enterprise to conduct or participate in such enterprise through a pattern of racketeering activity.

93. The association in fact of the two Defendants formed for the specific purpose of illegally extorting money from Plaintiff and use of the mails with a conscious and knowing intent to defraud is an enterprise.

94. Defendants are and were associated with the above-described enterprise.

95. Defendants conspired to conduct or participate, directly, or indirectly, in the affairs of the above-described enterprise through a pattern of racketeering activity, including but not limited to:

- (a) Attempted extortion in violation of 18 U.S.C. § 1951; and
- (b) Committing and attempting to commit mail fraud in violation of 18 U.S.C. §1342.

96. Defendants each conspired to commit, and committed, two or more predicate acts within a ten-year time span, including seeking to extort Plaintiff by demanding money, in the amount of \$5,000,000.00, by threatening to release false information and/or embarrassing communications about Plaintiff to Plaintiff's employer, family, and the public to harm or damage Plaintiff's business interests, relationships, and/or Plaintiff's personal and professional reputation if their monetary demands were not met, by sending or causing to be sent certain extortion letters through U.S. mail, by sending repeated, persistent, frequent, obscene, and harassing e-mails and other electronic communications, and by threatening litigation if their demands were not met.

97. Defendant's predicate acts were related to one another and formed a pattern of racketeering activity in that the acts sought to extort Plaintiff to pay money to Defendants by threatening to harm or damage Plaintiff's business interests, family relationships, and/or Plaintiff's personal and professional reputation as an astute and articulate defender of Christianity, and as a person of great spiritual and intellectual integrity.

98. The Defendants' predicate acts demonstrated criminal conduct of a continuing longstanding enterprise.

99. Defendants in conjunction with each other and individually, committed overt acts in furtherance of the above-described conspiracy and acts, including but not limited to Ms. Thompson sending repeated unsolicited inappropriate photographs and Mr. Thompson sending messages for the intended and willful purpose of creating a record they could manipulate and misconstrue for purposes of extorting money from Plaintiff.

100. Plaintiff was injured and suffered substantial harm by Defendants' overt acts committed in furtherance of the above-described conspiracy.

101. As a result of Defendants' violation of the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1962, Plaintiff is entitled to recover all fees and damages as provided under 18 U.S.C. § 1964, including treble damages.

102. By engaging in the misconduct described above and engaging in a civil conspiracy, Defendants have acted with malice, wantonness, oppression, and with a conscious indifference to circumstances and/or with the specific intent to cause Plaintiff harm. Accordingly, to punish, penalize, and deter Defendants for their tortious and wrongful conduct, Plaintiff is entitled to punitive damages in an amount to be determined by a jury.

COUNT THREE
**CONSPIRACY TO VIOLATE THE GEORGIA RACKETEER
INFLUENCED AND CORRUPT ORGANIZATION ACT**

103. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 102 of this Complaint as if fully set forth herein.

104. The Georgia Racketeer Influenced and Corrupt Organizations Act, O.C.G.A. §§ 16-14-1, *et seq.*, prohibits a conspiracy among persons employed by or associated with any enterprise to conduct or participate in such enterprise through a pattern of racketeering activity.

105. The association in fact of Defendants for the purpose of illegally extorting money from Plaintiff and use of the mails with a conscious and knowing intent to defraud is an enterprise.

106. Defendants are and were associated with the above-described enterprise.

107. Defendants conspired to conduct or participate, directly, or indirectly, in the affairs of the above-described enterprise through a pattern of racketeering activity, including but not limited to:

- (a) Attempting to commit theft by extortion in violation of O.C.G.A. § 16-4-1 and O.C.G.A. § 16-8-16;
- (b) Attempting extortion in violation of 18 U.S.C. § 1951;

(c) Attempting to commit theft by deception in violation of O.C.G.A.

§ 16-4-1 and O.C.G.A. § 16-8-3; and

(d) Committing and attempting to commit mail fraud in violation of 18

U.S.C. § 1342.

108. Defendants in conjunction with each other and individually, committed overt acts in furtherance of the above-described conspiracy.

109. Plaintiff was injured and suffered substantial harm by Defendants' overt acts committed in furtherance of the above-described conspiracy.

110. Plaintiff is entitled to recover actual and compensatory damages in an amount to be proven at trial including attorney's fees and punitive and treble damages pursuant to O.C.G.A. § 16-14-6(c).

111. As a result of Defendants' violation of the Georgia Racketeer Influenced and Corrupt Organizations Act, O.C.G.A. § 16-14-1 *et seq.*, and pursuant to O.C.G.A. § 13-6-11, Plaintiff is entitled to recover his attorney's fees in prosecuting his claims. Defendants have acted in bad faith, been stubbornly litigious, and have put Plaintiff through unnecessary trouble and expense.

112. Plaintiff is entitled to an order prohibiting Defendants from engaging in the same type of enterprise.

113. By engaging in the misconduct described above and engaging in a civil conspiracy, Defendants have acted with malice, wantonness, oppression, and with a conscious indifference to circumstances and/or with the specific intent to cause Plaintiff harm. Accordingly, to punish, penalize, and deter Defendants for their tortious and wrongful conduct, Plaintiff is entitled to punitive damages in an amount to be determined by a jury.

COUNT FOUR
**VIOLATION OF THE GEORGIA RACKETEERING INFLUENCED AND
CORRUPT ORGANIZATIONS ACT**

114. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 113 of this Complaint as if fully set forth herein.

115. The Georgia Racketeer Influenced and Corrupt Organizations Act, O.C.G.A. §§ 16-14-1, *et seq.*, prohibits a conspiracy among persons employed by or associated with any enterprise to conduct or participate in such enterprise through a pattern of racketeering activity.

116. The association in fact of Defendants for the purpose of illegally extorting money from Plaintiff use of the mails with a conscious and knowing intent to defraud is an enterprise.

117. Defendants are and were associated with the above-described enterprise.

118. Defendants conducted and participated, directly or indirectly, in the affairs of the above-described enterprise through a pattern of racketeering activity, including but not limited to:

(a) Attempting to commit theft by extortion in violation of O.C.G.A.

§ 16-4-1 and O.C.G.A. § 16-8-16;

(b) Attempting extortion in violation of 18 U.S.C. § 1951;

(c) Attempting to commit theft by deception in violation of O.C.G.A.

§ 16-4-1 and O.C.G.A. § 16-8-3; and

(d) Committing and attempting to commit mail fraud in violation of 18

U.S.C. § 1342.

119. Defendants in conjunction with each other and individually, committed overt acts in furtherance of the above-described conspiracy.

120. Plaintiff was injured and suffered substantial harm by Defendants' overt acts committed in furtherance of the above-described conspiracy.

121. Plaintiff is entitled to recover actual and compensatory damages in an amount to be proven at trial including attorney's fees and treble and punitive damages pursuant to O.C.G.A. § 16-14-6(c).

122. As a result of Defendants' violation of the Georgia Racketeer Influenced and Corrupt Organizations Act, O.C.G.A. § 16-14-1 *et seq.*, and under

O.C.G.A. § 13-6-11, Plaintiff is entitled to recover his attorney's fees in prosecuting his claims. Defendants have acted in bad faith, been stubbornly litigious, and have put Plaintiff through unnecessary trouble and expense.

123. Plaintiff is entitled to an order prohibiting Defendants from engaging in the same type of enterprise.

124. By engaging in the misconduct described above and engaging in a civil conspiracy, Defendants have acted with malice, wantonness, oppression, and with a conscious indifference to circumstances and/or with the specific intent to cause Plaintiff harm. Accordingly, to punish, penalize, and deter Defendants for their tortious and wrongful conduct, Plaintiff is entitled to punitive damages in an amount to be determined by a jury.

COUNT FIVE
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

125. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 124 of this Complaint as if fully set forth herein.

126. Defendants sending of obscene and/or nude photographs, attempted extortion, and other related wrongful conduct was intentional, willful, and wanton.

127. Defendants' scheme, including their repeated and continuing attempts to extort money from Plaintiff, their threats of public disclosure of scandalous

conduct that never occurred or occurred at the sole discretion of Defendants, is extreme, outrageous, and shocks the conscience.

128. As a result of Defendants' wrongful conduct, Plaintiff has suffered emotional distress which has been severe.

129. As a result of their wrongful conduct, Defendants are liable for intentional infliction of emotional distress. As a result of their intentional infliction of emotional distress, Plaintiff is entitled to recover compensatory damages, including general damages, in an amount to be proven at trial.

130. Plaintiff is also entitled to recover his expenses of litigation, including attorneys' fees, pursuant to O.C.G.A. § 13-6-11. Defendants have acted in bad faith, been stubbornly litigious, and have put Plaintiff through unnecessary trouble and expense.

131. By engaging in the misconduct described above and intentionally inflicting emotional distress, Defendants have acted with malice, wantonness, oppression and with a conscious indifference to circumstances and/or with the specific intent to cause Plaintiff harm. Accordingly, to punish, penalize, and deter Defendants for their tortious and wrongful conduct, Plaintiff is entitled to punitive damages in an amount determined by a jury.

COUNT SIX
**INVASION OF PRIVACY – INTRUSION UPON SECLUSION,
SOLITUDE AND PRIVATE AFFAIRS**

132. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 131 of this Complaint as if fully set forth herein.

133. Plaintiff has a constitutional, common law, and statutory right to privacy, and to be free from being subjected to repetitive, persistent, frequent, unsolicited and unwanted intrusion upon his seclusion and solitude and into his private affairs that amounts to a course of tortious hounding.

134. Plaintiff had a reasonable expectation of privacy and to be free from unwanted visits and repeated calls, text messages, letters, e-mails, and other messages that, in their totality, were so repetitive, persistent and frequent as to amount to a course of tortious hounding of Plaintiff.

135. As part of Defendants' scheme, Defendants repeatedly sent unsolicited and unwanted messages to Plaintiff, including sexually explicit photographs and messages and extortionate letters, called Plaintiff, and, on at least one occasion, showed up at Plaintiff's place of business, appeared outside Plaintiff's home, and contacted Plaintiff's daughter.

136. Defendants' conduct is offensive and objectionable to a reasonable person with ordinary sensibilities under the circumstances.

137. In invading Plaintiff's privacy and intruding upon his seclusion and solitude and into his private affairs, Defendants acted with a specific intent to cause harm.

138. Defendants' invasion into Plaintiff's privacy and intrusion into his seclusion and solitude and into his private affairs has caused Plaintiff to suffer damages including mental suffering, emotional distress, and injury to his personal sensibilities and mental repose. Plaintiff is, therefore, entitled to recover compensatory damages from Defendants, including general damages, in an amount to be proven at trial.

139. Plaintiff is also entitled to recover his expenses of litigation, including attorneys' fees, pursuant to O.C.G.A. § 13-6-11. Defendants have acted in bad faith, been stubbornly litigious, and have put Plaintiff through unnecessary trouble and expense.

140. By engaging in the misconduct described above and invading Plaintiff's privacy, Defendants have acted with malice, wantonness, oppression, and a conscious indifference to circumstances and/or with the specific intent to cause Plaintiff harm. Accordingly, to punish, penalize, and deter Defendants from their tortious and wrongful conduct, Plaintiff is entitled to punitive damages in an amount to be determined by a jury.

COUNT SEVEN
CIVIL CONSPIRACY

141. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 140 of this Complaint as if fully set forth herein.

142. Beginning on or before October 3, 2014 and continuing thereafter, Defendants agreed, schemed, combined, and conspired to commit the acts described herein by unlawful means, including, but not limited to, a violation of O.C.G.A. § 16-8-16, invasion of privacy, and intentional infliction of emotional distress.

143. In furtherance of the above-described agreement, scheme, and conspiracy, Defendants committed unlawful and overt acts described herein.

144. The above-mentioned overt acts committed in furtherance of the above-described agreement, scheme, and conspiracy caused injury and substantial harm to Plaintiff. Plaintiff is, therefore, entitled to recover compensatory damages, including special and general damages, in an amount to be proven at trial.

145. Plaintiff is also entitled to recover his expenses of litigation, including attorneys' fees, pursuant to O.C.G.A. § 13-6-11. Defendants have acted in bad faith, been stubbornly litigious, and have put Plaintiff through unnecessary trouble and expense.

146. By engaging in the misconduct described above and engaging in a civil conspiracy, Defendants have acted with malice, wantonness, oppression, and with a conscious indifference to circumstances and/or with the specific intent to cause Plaintiff harm. Accordingly, to punish, penalize, and deter Defendants for their tortious and wrongful conduct, Plaintiff is entitled to punitive damages in an amount to be determined by a jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests the following relief:

- (i) That a judgment be entered declaring that (1) that there was no confidential and/or fiduciary relationship between Ms. Thompson and Plaintiff; or, alternatively, (2) there was a confidential and/or fiduciary relationship between Ms. Thompson and Plaintiff but Plaintiff never breached such relationship; and
- (ii) That judgment be entered in his favor of Plaintiff against both Defendants, jointly and severally, including but not limited to a judgment granting actual damages, statutory damages, treble damages, punitive damages, exemplary damages, attorney's fees, costs of litigation, special damages, general damages, and all other damages provided by Georgia law.

(iii) That judgment be entered against all Defendants, jointly and severally, pursuant to 18 U.S.C. § 1964, awarding all damages and relief provided thereunder.

(iv) That a judgment be entered in favor of Plaintiff against all Defendants granting such other further relief as this Court deems just and proper.

JURY DEMAND

Plaintiff hereby demands that all claims in this Complaint that are proper for presentation to a jury be tried to a jury.

This 3d day of August 2017

Respectfully submitted,

/s/ Michael R. Boorman

Michael R. Boorman
Georgia Bar No. 067798
HUFF POWELL BAILEY LLC
999 Peachtree Street, N.E.,
Suite 950
Atlanta, GA 30309
Telephone: 404-892-4022
Fax: 404-892-4033
mboorman@huffpowellbailey.com

Brian T. Kelly
Jonathan Sablone
Christopher E. Queenin
NIXON PEABODY LLP
100 Summer Street
Boston, MA 02110
Telephone: 617-345-1000
Fax: 518-427-2666

bkelly@nixonpeabody.com
jsablone@nixonpeabody.com
cqueenin@nixonpeabody.com
Pro Hac Vice Applications Pending

CERTIFICATE OF SERVICE

I hereby certify that on this day I have caused a copy of the foregoing document to be electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filings to all attorneys of record. In addition, I have caused copies of the foregoing document to be mailed to Bradley Thompson and Lori Anne Thompson, each at their home address, which is 168 Sunrise Drive, RR#7, Bellville, Ontario K8N 4Z7, Canada.

This 3d day of August, 2017

Respectfully submitted,

/s/ Michael R. Boorman

Michael R. Boorman
Georgia Bar No. 067798
HUFF POWELL BAILEY LLC
999 Peachtree Street, N.E.,
Suite 950
Atlanta, GA 30309
Telephone: 404-892-4022
Fax: 404-892-4033
mboorman@huffpowellbailey.com