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JUN 25 2007	
CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
BY _____	S. DEPUTY

1 William V. Morgan  
2 16019 N. 23<sup>rd</sup> Drive  
3 Phoenix, AZ 85023  
4 Phone (480) 593-8627

5  
6 IN THE UNITED STATES DISTRICT COURT  
7 FOR THE DISTRICT OF ARIZONA  
8 401 West Washington Street, Phoenix, AZ 85003  
9

10 William V. Morgan	)	
11	)	No. CV07-786-PHX-SRB
12 Plaintiff,	)	
13 vs.	)	AMENDED COMPLAINT
14	)	
15 Kalaco Scientific, Inc, an Nevada	)	
16 Corporation; KalSci International Inc.;	)	
17 Nexalin Technologies Inc., a Nevada	)	
18 Corporation; Yakov Katsnelson and Tatiana	)	
19 Katsnelson, husband and wife; Katsnelson	)	
20 Medical Consulting, LLC; Mike Jackson and	)	
21 Susan Jackson, husband and wife; Bradhurst	)	
22 Consulting LLC; Raymond Pizinger, and Jane	)	
23 Doe Pizinger, husband and wife, BBP	)	
24 Consultants, Inc.; Randy Chavez and Jane Doe	)	
25 Chavez, husband and wife; Linda Wheat;	)	
26 Deborah Stec; Dawn Rice, and John Doe Rice,	)	
27 husband and wife; Robert Scaccianoce and	)	
28 Sheila McCabe, husband and wife; McCabe	)	
29 Ventures, Inc., a California Corporation;	)	
30 Carol Payne and Jeff Payne, husband and wife;	)	
31 Noblitt & Rueland, Sagentia Group, a United	)	
32 Kingdom Corporation with offices in the	)	
33 United States; Jennifer Morgan and John Doe	)	
34 Morgan, husband and wife; Keith	)	
35 Beauchamp and Jane Doe Beauchamp,	)	
36 husband and wife; Amy M. Wilkins and John	)	
37 Doe Wilkins, husband and wife; Jessica M.	)	
38 Hernandez, and John Doe Hernandez, husband	)	
39 and wife; and Lewis and Roca LLP, an Arizona	)	
40 LLP; Mr. John Doe, and Mrs. Jane Doe; Ms.	)	
41 Jane Doe; John Doe Inc.;; John Doe LLP; and	)	
42 John Doe FLP,	)	
43	)	
44 Defendants.	)	
45 _____	)	
46	)	

47 Plaintiff William V. Morgan ("Morgan"), a single individual allege as follows:

48 **JURISDICTION**

49 1. Plaintiff Morgan is a resident of Maricopa County, Arizona, filing pro se, hereby files this  
50 civil action for damages in the United States District Court for the District of Arizona, which has  
51 jurisdiction by virtue of the complaint alleging violations of several federal statutes including but  
52 not limited to violations of CFR 807.20, and the Defendants all do business as individuals or  
53 under various entities in Maricopa County Arizona.

54 **PARTIES AND GENERAL ALLEGATIONS**

55 2. Plaintiff **William V. Morgan** is a resident of Maricopa Country, Arizona. He is a single  
56 person, acting pro se.

57 3. Defendant **Kalaco Scientific, Inc.** ("Kalaco"), is a Nevada Corporation (# C35244-2001)  
58 with its principal place of business in Maricopa County, Arizona. The Officers are listed as  
59 Treasurer/Secretary, Mike Jackson; President, Yakov Katsnelson; Director, Raymond Pizinger.  
60 The Resident Agent in Nevada is Corporation Services of Nevada, Inc., 4560 S. Decatur Blvd.,  
61 Suite 202, Las Vegas, NV 89103. Kalaco is a semi-public corporation, having raised, and/or is  
62 raising capital through a U.S. SEC Regulation D Section 506 Private Placement of securities  
63 regulated under the U.S. Securities and Exchange Commission (SEC). To date it is believed  
64 Kalaco has raised an estimated \$18,000,000 from an estimated 1,300 investors in many U.S.  
65 states and perhaps even foreign countries. This makes them subject to the rules and regulations  
66 of all the various applicable federal and state securities acts as amended.

67 4. Defendant **KalSci International, Inc.** ("KalSci"), is an Arizona Corporation (# -1287915-  
68 0) with its principal place of business in Maricopa County, Arizona listed as 7721 E. Gray Rd.,  
69 Scottsdale AZ 85269-6955. Its Statutory Agent is Christopher P. Siegle, at Ryley, Carlock &  
70 Applewhite PA, One North Central, Suite 1200, Phoenix, AZ 85004. Kalsci is a private  
71 corporation. It is believed they are wholly or partially owned and wholly funded by Kalaco using  
72 Kalaco shareholders invested money.

73 5. Defendant **Nexalin Technologies, Inc.**, is a Nevada Corporation (# E0483572006-0). The  
74 officers and directors are listed as: Secretary/Treasurer/Director, Michael Jackson;  
75 President/Director, Yakov Katsnelson, Director, Raymond Pizinger. The resident agent is the  
76 Corporation Trust Company of Nevada, 6100 Neil Road, Suite 500, Reno, NV 89511. The  
77 address of all of the officers and directors is listed as being 7721 E. Gray Road, Suite 101,  
78 Scottsdale AZ 85260, so the principal place of business is in Maricopa County, Arizona. Nexalin

79 Technologies, Inc., is believed to be wholly or partially owned by Kalaco and funded in whole or  
80 in part by Kalaco using Kalaco invested money.

81 **Hereafter when "Kalaco" is referred to, it includes Kalaco,**  
82 **KalSci International, Inc., and Nexalin Technologies, Inc.**

83 6. Defendants **Yakov Katsnelson and Tatiana Katsnelson** ("Katsnelson"), a married couple,  
84 are now believed to be residents of New Jersey, and Yakov Katsnelson and Tatiana Katsnelson,  
85 during the time of this action, conducted business in Maricopa County, Arizona. Yakov  
86 Katsnelson works or did work for Kalaco Scientific, Inc., KalSci International, Inc., Nexalin  
87 Technologies, Inc., and/or Katsnelson Medical Consulting LLC. Tatiana Katsnelson worked for,  
88 and may still work for Kalaco Scientific, Inc., KalSci International, Inc., Nexalin Technologies,  
89 Inc., and/or Katsnelson Medical Consulting, LLC. The acts committed by Mr. Katsnelson and  
90 Mrs. Katsnelson, as alleged herein, benefited the marital community.

91 7. Defendant **Katsnelson Medical Consulting LLC** ("KMC"), is a Nevada Limited Liability  
92 Corporation (#LLC 16648-2002), owned by Yakov Katsnelson and Tatiana Katsnelson, and  
93 possibly Maria Chvetchkova. Tatiana Katsnelson, and Maria Chvetchkova are listed as the  
94 Managing Members, and during the time of the acts herein, Katsnelson Medical Consulting LLC  
95 did business with Kalaco. The Resident Agent in Nevada is Corporation Services of Nevada,  
96 Inc., 4560 S. Decatur Blvd., Suite 202, Las Vegas, NV 89103. The acts as alleged herein,  
97 benefited the marital community of defendants Katsnelson.

98 8. Defendants **Mike Jackson and Susan Jackson** ("Jackson"), husband and wife, are  
99 residents of Yavapai County. Arizona and Ohio respectively. During the time of the acts herein,  
100 Jackson worked and it is believed still works for Kalaco Scientific, Inc., KalSci International,  
101 Inc., Nexalin Technologies, Inc., and/or Bradhurst Consulting LLC. It is believed Mrs. Jackson  
102 has also been on salary of Kalaco Scientific, Inc., KalSci International, Inc. Nexalin  
103 Technologies, Inc., Bradhurst Consulting LLC, or Mrs. Jackson has received cash through an  
104 indirect means from Kalaco Scientific, Inc., KalSci International, Inc. Nexalin Technologies,  
105 Inc., and/or Bradhurst Consulting LLC through Mr. Jackson. The acts committed by Mr.  
106 Jackson, as alleged herein, benefited the marital community.

107 9. Defendant **Bradhurst Consulting LLC** ("Bradhurst"), is a Nevada Limited Liability  
108 Corporation (#LLC9697-2002). Michael Jackson is the Managing Member and owner and  
109 Bradhurst Consulting LLC has its principal place of business in Yavapai County, Arizona and  
110 during the time of the acts herein, Katsnelson Medical Consulting LLC did business with Kalaco.  
111 The Resident Agent in Nevada is Corporation Services of Nevada, Inc., 4560 S. Decatur Blvd.,

112 Suite 202, Las Vegas, NV 89103. The acts, as alleged herein, benefited the marital community of  
113 Defendants Jackson.

114 10. Defendants **Raymond Pizinger** (aka **Raymond Zinger, BBP Consultants, Inc, BBP**  
115 **Wellness, Inc.**, or variations thereof) and **Jane Doe Pizinger** ("Pizinger") (aka **Mrs. Zinger,**  
116 **BBP Consultants, Inc, BBP Wellness, Inc.**, or variations thereof), husband and wife, are  
117 believed to be residents of Thurston County, Washington, but do business in Maricopa County,  
118 Arizona. Raymond Pizinger works for Kalaco Scientific, Inc., KalSci International, Inc., and/or  
119 Nexalin Technologies, Inc. It is believed Jane Doe Pizinger did work, and may still work as a  
120 consultant for Kalaco Scientific, Inc., KalSci International, Inc., and/or Nexalin Technologies,  
121 Inc. under a corporate consultant name as above (*to be determined and added as a defendant*).  
122 The acts committed by Mr. Pizinger and Mrs. Pizinger, as alleged herein, benefited the marital  
123 community.

124 11. Defendant **BBP Consultants, Inc.** ("BBP") is a Washington Corporation (UBI #  
125 602094809), with a Registered Agent listed as the HMS Development Enterprises, Inc., c/o 8530  
126 Cascidia Avenue, Everett, WA 98208. Through Pizinger, BBP has done consulting work for  
127 Kalaco, and such work has benefited the shareholders, directors and officers of BBP, and  
128 Raymond and Jane Doe Pizinger's marital community.

129 12. Defendants **Randy Chavez and Jane Doe Chavez** ("Chavez"), husband and wife, are  
130 residents of Maricopa County, Arizona. Randy Chavez works for Kalaco Scientific, Inc., KalSci  
131 International, Inc., and/or Nexalin Technologies, Inc. The acts committed by Mr. Chavez, as  
132 alleged herein, benefited the marital community.

133 13. Defendant **Linda Wheat** ("Wheat"), a single individual, who lives in Maricopa County,  
134 Arizona and who was Kalaco's Director of Regulatory Compliance at the time of the events  
135 herein. The acts as alleged herein, benefited Ms. Wheat.

136 14. Defendant **Deborah Stec** ("Stec"), a single individual, who lives in Maricopa County,  
137 Arizona, was Kalaco's Treasurer at the time of the events herein. The acts, as alleged herein,  
138 benefited Ms. Stec.

139 15. Defendants **Dawn Rice and John Doe Rice** ("Rice"), wife and husband, who live in  
140 Georgia, and Dawn Rice works for Kalaco Scientific, Inc., KalSci International, Inc., and/or  
141 Nexalin Technologies, Inc. The acts committed by Mrs. Rice, as alleged herein, benefited the  
142 marital community.

143 16. Defendants **Robert Scaccianoce and Sheila McCabe** ("Scaccianoce and McCabe"),  
144 husband and wife, are residents of Orange County, California, and Robert Scaccianoce works for

145 Kalaco Scientific, Inc., KalSci International, Inc., Nexalin Technologies, Inc, and McCabe  
146 Ventures, Inc. Sheila McCabe works for McCabe Ventures, Inc., a firm with a contract with  
147 Kalaco Scientific, Inc., KalSci International, Inc., and/or Nexalin Technologies, Inc. The acts  
148 committed by Scaccianoce and McCabe, as alleged herein, benefited the marital community.

149 17. Defendant **McCabe Ventures, Inc.** ("McCabe"), a California Corporation (# C2085870),  
150 that does business with Kalaco Scientific, Inc., KalSci International, Inc., and/or Nexalin  
151 technologies, Inc. on a contract basis. Scaccianoce is listed as their Agent for Service of Process,  
152 with the address of 18584 Lime Circle, Fountain Valley, CA 92708. The acts committed, as  
153 alleged herein, benefited the marital community of Scaccianoce and McCabe.

154 18. Defendants **Carol Payne and Jeff Payne** ("Payne"), wife and husband. Carol Payne works  
155 for McCabe Ventures, Inc. as a full-time contract employee. The acts committed by Mrs. Payne,  
156 as alleged herein, benefited the marital community.

157 19. Defendant **Noblitt & Rueland** ("Noblitt"), is believed to be a California Corporation yet  
158 no corporate filings could be found for them in California. They are located at 5405 Alton  
159 Parkway, Suite 5A #530, Irvine, CA 92604-3718, which sounds like a postal box drop. Their  
160 phone number is (714) 258-4646. Noblitt worked for Kalaco Scientific, Inc., KalSci  
161 International, Inc. and/or Nexalin technologies, Inc. on a contract basis and provided the services  
162 of Raymond Pizinger to Kalaco Scientific, Inc., KalSci International, Inc., and/or Nexalin  
163 Technologies, Inc. Noblitt failed to supervise the actions of their employee (or contract  
164 employee), Pizinger, thereby becoming responsible and liable for his actions. Noblitt's providing  
165 services to Kalaco benefited Noblitt and its shareholders, directors and officers.

166 20. Defendant **Sagentia Group** ("Sagentia" aka Scientific Generics, Inc.), a UK corporation  
167 with offices in the United States, that does or did contract manufacturing for Kalaco Scientific,  
168 Inc., KalSci International, Inc. and/or Nexalin Technologies, Inc., and whom through their  
169 violation of quality control and good manufacturing practices manufactured and released flawed  
170 Nexalin devices to Kalaco Scientific, Inc. The acts committed by Sagentia, as alleged herein,  
171 benefited Sagentia, its shareholders, directors and officers.

172 21. Defendants **Jennifer Morgan and John Doe Morgan** ("Jennifer"), are residents of  
173 Maricopa County, Arizona, and the acts committed by Ms. Morgan, as alleged herein, benefited  
174 the marital community. Jennifer Morgan has conspired with and or is conspiring with, and has or  
175 is aiding and abetting Kalaco and other defendants to distribute sensitive, confidential and  
176 proprietary information regarding Plaintiff William Morgan for the benefit of herself and/or the  
177 marital community.

178 22. Defendants **Keith Beauchamp and Jane Doe Beauchamp** (“Beauchamp”), husband and  
179 wife are believed to be residents of Maricopa Arizona, and the acts committed by Mr.  
180 Beauchamp, as alleged herein, benefited the law firm of Lewis and Roca LLP, and the  
181 Beauchamp marital community. Keith Beauchamp has conspired with and or is conspiring with  
182 Kalaco and the other defendants to violate federal and state statutes.

183 23. Defendants **Amy M. Wilkins and John Doe Wilkins** (“Wilkins”), wife and husband are  
184 believed to be residents of Maricopa Arizona, and the acts committed by Mrs. Wilkins, as  
185 alleged herein, benefited the law firm of Lewis & Roca LLP, and the Wilkins marital  
186 community.

187 24. Defendants **Jessica M. Hernandez and John Doe Hernandez** (“Hernandez”), wife and  
188 husband, and the acts committed by Mrs. Hernandez, as alleged herein, benefited the law firm of  
189 Lewis & Roca LLP, and the Hernandez marital community.

190 25. Defendants **Lewis and Roca, LLP** (“Lewis”), an Arizona Corporation, who works for  
191 Kalaco Scientific, Inc., KalSci International, Inc., Nexalin Technologies, Inc., and Katsnelson  
192 offering legal advice on a contract basis. The acts as alleged herein, by Beauchamp, Wilkins, and  
193 Hernandez benefited the Partners, owners, directors, officers, and employees of Lewis & Roca.

#### 194 **SPECIFIC ALLEGATIONS**

##### 195 **Katsnelson Violates 21 CFR Part 807.20 and**

##### 196 **Section 510 of the US DDF&C Act by illegally importing TES Devices.**

197 26. Plaintiff incorporates by reference the allegations of paragraph 1 through 25 of the  
198 Complaint.

199 27. These first two claims, while only incidentally related to the rest of the claims, had these  
200 two violations not occurred, Kalaco would never have been created, and the Plaintiff would have  
201 never been injured on a Nexalin device.

202 28. When Katsnelson entered the United States as an immigrant, he brought an unknown  
203 number of Russian transcranial electrostimulation (TES) experimental medical devices with him  
204 into the U.S., and then distributed them, one finding its way into the hands of defendant Jackson.  
205 These devices were never declared, violating Section 10 of the U.S. Federal Food Drug and  
206 Cosmetic Act (“DDF&C Act”), nor were they registered with the U.S. FDA violating 21 CFR  
207 Part 807.20. These devices were later to be known as “blue boxes” or “black boxes” by Jackson.  
208 Katsnelson’s having possession of these devices to bring into the U.S. illegally, is also subject to  
209 questionable means.

##### 210 **Katsnelson Violates 21 CFR Part 807.20 and**

211 **Section 510 of the US DDF&C Act by illegally importing ACKES Devices.**

212 29. Plaintiff incorporates by reference the allegations of paragraph 1 through 28 of the  
213 Complaint.

214 30. In the spring of 2000, believed to have ended in May, Katsnelson traveled to Russia, and  
215 had four TES copies made he had labeled as "AKCES" devices, the difference being an AC  
216 output. These AKCES devices were experimental devices, and Katsnelson distributed them, one  
217 finding its way to Defendant Michael Jackson, one to Ray Wallage, and one to Defendant Robert  
218 Scaccianoce. These devices were the first prototype of Kalaco's current Nexalin device. These  
219 devices were never declared, violating Section 10 of the U.S. DDF&C Act, nor were they  
220 registered with the US FDA violating 21 CFR Part 807.20.

221 **Kalaco, Katsnelson, KMC, Jackson, Bradhurst, Pizinger, BBP, Chavez, Wheat, Noblitt,**  
222 **and Sagentia violate Good Manufacturing Practices (GMP) Requirements**  
223 **as set forth in the Quality System (QS) regulations**  
224 **promulgated under Section 520 of the FFD&C Act.**

225 31. Plaintiff incorporates by reference the allegations of paragraph 1 through 30 of the  
226 Complaint.

227 32. In the summer of 2005, the named Defendants Kalaco, Katsnelson, KMC, Jackson,  
228 Bradhurst, Pizinger, Noblitt, BBP, Chavez, Wheat, and Sagentia violated the Good  
229 Manufacturing Practices (GMP) requirements set forth in the Quality System Practices (QS)  
230 regulations set promulgated under Section 520 of the FFD&C Act. From knowledge and belief  
231 the devices manufactured by Sargentia contained multiple product defects. Some of these units  
232 produced excessive voltage and amperage output to a patient, and/or static electrical discharges,  
233 both of which had the potential to cause "catastrophic injury" to patients per Kalaco's own  
234 internal documentation. Noblitt and Pizinger were consultants to Kalaco at the time of this  
235 manufacturing run and were advising Kalaco on Good Manufacturing Practices (GMP)  
236 requirements set forth in the Quality Systems (QS) regulations promulgated under Section 520 of  
237 the FFD&C Act, ISO Certification, and CE Marking certification. Pizinger was also a regulatory  
238 consultant to Kalaco at the time, working for Noblitt, and was consulting on Quality Systems  
239 Practices (QS) regulations promulgated under Section 520 of the FFD&C Act, ISO Certification,  
240 and CE Marking certification.

241 **Kalaco, Katsnelson, KMC, Jackson, Bradhurst, and Stec, Kalaco employees and officers,**  
242 **use a non-FDA Approved or Cleared Medical Device**  
243 **on Plaintiff William Morgan, causing serious and permanent injury.**

244 33. Plaintiff incorporates by reference the allegations of paragraph 1 through 32 of the  
245 Complaint.

246 34. Employees of Kalaco, acting in their official capacity, specifically Mike Jackson, with  
247 Katsnelson's knowledge and consent, and Deborah Stec, with Jackson's and Katsnelson's  
248 knowledge and consent, and as part of their official capacity acting for the benefit of Kalaco,  
249 placed Plaintiff William Morgan on one or more of the Nexalin devices that were manufactured  
250 in violation of the claim above, and this caused serious and permanent injuries to Defendant  
251 William Morgan. Those injuries, specifically amount to left temporal lobe injuries leading to  
252 epileptic type seizures, and frontal lobe injuries leading to constant, and severe migraine type  
253 headaches, and having a permanent moderate to severe cognitive functional disability. Plaintiff  
254 Morgan has been permanently injured to the point where he can no longer drive a car, no longer  
255 hold employment, and has a great deal of trouble dealing with the issues of everyday life. He  
256 often suffers seizures several times a day, coming as frequently as four to five seizures a day  
257 even when under high doses of anti-seizure medications. At times, these seizures are so severe  
258 they interfere with Morgan's other bodily functions, such as breathing, and at that point they  
259 become life threatening.

260 35. The Nexalin device(s) used were restricted from sale, distribution, or use by FDA Section  
261 520(e) of the FDA rules and regulations, yet the defendants used this non-approved or non-  
262 cleared device on Plaintiff Morgan creating an unreasonable and substantial risk of illness or  
263 injury, and in fact, permanently injuring Plaintiff Morgan in the process.

264 36. Further, Kalaco had an obligation to register with the FDA as being engaged in the  
265 manufacture of a device intended for human use. Such registration should have been done within  
266 30 days after entering into an operation as defined in CFR 807.20. Kalaco did not register as a  
267 device medical manufacturer until June 2006, about a year after Plaintiff Morgan was injured on  
268 a device manufactured by Kalaco (the device was actually manufactured to Kalaco's  
269 specifications by defendant Sargentia). With this violation, defendant Kalaco, through  
270 defendants Jackson, Katsnelson and Stec, actually used an unregistered, and therefore illegal  
271 medical device on Plaintiff Morgan.

272 **Kalaco, an unlicensed Health Care Institution, Katsnelson, KMC, Jackson, Bradhurst, and**  
273 **Stec Place Plaintiff Morgan on a Non-FDA Cleared or Approved Nexalin Device**  
274 **to Treat Plaintiff's Osteoarthritis**

275 37. Plaintiff incorporates by reference the allegations of paragraph 1 through 36 of the  
276 Complaint.



277 38. By the simple act of defendants Jackson and Stec used and dispensed a Nexalin device to  
278 treat Plaintiff Morgan with a non-FDA cleared or approved medical device, with defendant  
279 Katsnelson's prior knowledge and approval, for Plaintiff's osteoarthritis, Kalaco was converted  
280 from a medical device manufacturer to a health care institution, which requires a license under  
281 Arizona Revised Statutes (ARS) 36-430, and other Arizona statutes. By virtue of being a non-  
282 licensed health care institution, Kalaco is therefore declared a nuisance inimical to the public  
283 health and safety and became liable to Plaintiff Morgan for their acts.

284 39. Defendants Kalaco, Jackson and Stec with Katsnelson's oversight and approval, violated  
285 ARS 32-1491(c) by dispensing a Nexalin device to Plaintiff Morgan without a prescription.

286 40. Kalaco, Jackson, and Stec with Katsnelson's approval violated ARS 32-1491(d) because  
287 none of the named defendants are licensed health care professionals, so it would have been  
288 impossible for them to have prescribed and/or administered Nexalin treatments or to dispense a  
289 Nexalin device to Plaintiff Morgan legally under ARS 32-1436(A)(17).

290 41. Further, Kalaco and its employees failed to provide Plaintiff Morgan with adequate  
291 instructions for use, health and safety data on the Nexalin device(s) used in violation of ARS 32-  
292 1491(f) becoming liable to Plaintiff Morgan for their acts.

293 42. Further, Kalaco and its employees failed to provide Plaintiff Morgan with adequate  
294 efficacy data on the Nexalin device(s) used .

295 43. Further, when Plaintiff Morgan questioned defendant Jackson regarding the "contra-  
296 indication list", defendant Jackson stated it was not an issue with Plaintiff Morgan, yet Kalaco  
297 has not done sufficient clinical studies to develop a valid contra-indication list for the Nexalin  
298 device(s), instead illegally relying or copying Russian TES technology clinical study results, and  
299 the two technologies are not the same technology.

300 **Kalaco, Katsnelson, KMC, Jackson, Bradhurst, and Stec,**

301 **Kalaco's employees and officers place Plaintiff Morgan on**

302 **a non-FDA approved or cleared device, amounting to practicing medicine without a license.**

303 44. Plaintiff incorporates by reference the allegations of paragraph 1 through 43 of the  
304 Complaint.

305 45. Employees of Kalaco, specifically Jackson and Stec, acting in their official capacity and for  
306 the benefit of Kalaco, with Katsnelson's knowledge and consent, placed Plaintiff William  
307 Morgan on one or more of the Nexalin devices from the claims beginning with paragraph 48  
308 above, and yet, none of the defendants, Jackson, Stec or Katsnelson are licensed, practicing  
309 physicians pursuant to ARS 32-1422 inclusive.

310 46. Defendants also ignored the fact Plaintiff Morgan should have been on the contraindication  
311 list for the device from another health issue he has, and Defendants ignored this when placing  
312 him on the device. This was gross negligence on the part of defendants who were not licensed to  
313 practice medicine under ARS 32-1422 inclusive.

314 47. In fact, Kalaco and the defendants had not done sufficient clinical study data to have  
315 developed a contraindication list for Nexalin, and they were using one for the Russian TES  
316 technology, which is similar but not exactly the same technology. This also amounted to gross  
317 negligence and medical malpractice on the part of defendants who are not licensed to practice  
318 medicine under ARS 32-1422 inclusive because they meet none of the requirements of this  
319 statute and have made no attempt to comply with or complete the requirements of this statute.

320 **Kalaco, Katsnelson, KMC, Jackson, Bradhurst, Pizinger, BBP, Wheat, Chavez, Rice, Stec,**  
321 **Scaccianoce, McCabe, Payne, Noblitt, Sagentia, Beauchamp, Wilkins, Hernandez,**  
322 **Lewis & Roca and Others Conspire to Cover Up Plaintiff William Morgan's injuries.**

323 48. Plaintiff incorporates by reference the allegations of paragraph 1 through 47 of the  
324 Complaint.

325 49. After being injured, Plaintiff William Morgan made numerous reports to Kalaco and its  
326 employees, specifically with complaints to Mike Jackson, Don Kelley, Susan Bateman, Robert  
327 Scaccianoce, and Beauchamp and Lewis & Roca regarding his injury. Each of the named  
328 Defendants in the title of this complaint above has in some way, to be identified and proved at  
329 trial, hid and/or covered up the reports of the injuries, or conspired to do so. All of this, from  
330 each of the defendants was in violation of the Medical Device Reporting (MDR) requirements as  
331 amended in 1990, 1992, 1995, and again in 1997 found in 21 CFR Part 803, which requires the  
332 report of an injury to be submitted to the FDA within five (5) work days in the event of a device  
333 related death, serious injury, or malfunction of a device.

334 *Continued...*

335 **Kalaco, Katsnelson, KMC, Jackson, Bradhurst, Cause the Termination**  
336 **of Plaintiff Morgan to Prevent Him From Raising Issues of**  
337 **Safety and Health Concerns of the Nexalin Device.**

338 50. Plaintiff incorporates by reference the allegations of paragraph 1 through 49 of the  
339 Complaint.

340 51. When Plaintiff Morgan reported his injuries from the Nexalin device to Mike Jackson and  
341 his immediate supervisor, Donald Kelley, Kalaco, through the acts of Katsnelson, KMC,  
342 Jackson, Bradhurst, and Employees Kelley, and Stec terminated Morgan and thereafter these  
343 parties and defendants claimed Morgan was crazy and that he was not injured. This was still  
344 happening as late as February 2007, when Scaccianoce and Payne used this excuse to keep  
345 Morgan from attending the 2007 Kalaco annual shareholders meeting and/or to pacify angry  
346 shareholders. This act, effectively prevented Plaintiff Morgan from raising safety and health  
347 concerns over the Nexalin device as an ex-employee of Kalaco, and thereby was a violation of  
348 the Whistleblower Protection Provisions of the Occupational Safety and Health Act (OSHA)  
349 Title 29 USC 660(c).

350 52. Through this action, defendants also prevented Morgan from obtaining timely quality  
351 medical care to determine how extensive Plaintiff Morgan's injuries were.

352 **Pizinger, Noblitt, and BBP, with the approval of Katsnelson, KMC, Jackson, Bradhurst,**  
353 **Rice, Wheat, and Chavez Alter the Final Report of Decus BioMedical on Kalaco's Russian**  
354 **Clinical Studies Where Such Report Summarized the Lack of a Statistically Significant**  
355 **Difference Between the Active and Placebo Nexalin Devices. The Intent Was**  
356 **to Defraud Health Canada and the U.S. FDA.**

357 53. Plaintiff incorporates by reference the allegations of paragraph 1 through 52 of the  
358 Complaint.

359 54. In December 2005, Pizinger received the final report from Dr. Grace Bartoo of Decus  
360 BioMedical on Kalaco's Russian Clinical Trials of their Nexalin device. That report in its  
361 original form, concluded or summarized that there was no statistically significant difference  
362 between the active and placebo (sham) devices in the study. The evidence and testimony will  
363 show Pizinger, acting as a consultant to Kalaco from Noblitt, then altered this document, with the  
364 approval and knowledge of Katsnelson and Jackson, and the knowledge of Wheat, Rice, and  
365 Chavez, and Pizinger removed the conclusion or summary above, and rewrote the document.  
366 Pizinger later presented the altered document to Health Canada and the U.S. FDA. This is in  
367 violation of Title 18, Crimes and Criminal procedure, Part I Crimes, Chapter 47, Fraud and False

368 Statements, Section 1002. It also violates U.S. Securities and Exchange Commission Act of 1934  
369 (the Act), Section 18, which regulates misleading statements to investors and potential investors  
370 and various state securities laws. The specific violation here comes about by virtue of the  
371 intentional omission in bad faith of the material fact that the action described herein was a  
372 violation of federal law, and this placed investors' monies at risk.

373 55. Further, the documents as presented to Health Canada, and the U.S. FDA by Pizinger and  
374 Katsnelson (giving further evidence of their conspiracy, aiding and abetting to defraud the U.S.  
375 and Canadian Government) were fraudulent because they did not include Plaintiff's reported  
376 injury as required by the Medical Device Reporting (MDR) requirements as amended in 1990,  
377 1992, 1995, and again in 1997 found in 21 CFR Part 803, which requires the report of an injury  
378 to be submitted to the FDA within five (5) work days in the event of a device related death,  
379 serious injury, or malfunction of a device. Without reporting Plaintiff Morgan's claim of an  
380 injury, the documentation presented to Health Canada and the U.S. FDA was counterfeit in its  
381 inception and writing and therefore fraudulent.

382 **Katsnelson, KMC, Jackson, Bradhurst, Pizinger, Noblitt, BBP, Wheat, Stec, Rice, Chavez,**  
383 **and Scaccianoce Aid, Abet, and Conspire to Put Kalaco Out of Business, by First Taking**  
384 **Over Kalaco, the Continued Hiding and Cover Up of Plaintiff's Morgan's Injuries, Then**  
385 **the Taking, Removing, Hiding, Embezzling or Stealing the Cash and Assets**

386 56. Plaintiff incorporates by reference the allegations of paragraph 1 through 55 of the  
387 Complaint.

388 57. Upon knowledge and belief Defendants Katsnelson, KMC, Jackson, Bradhurst, Pizinger,  
389 Noblitt, BBP, Wheat, Stec, Rice, Chavez and Scaccianoce all conspired with other employees of  
390 Kalaco to first remove and terminate the then existing CEO, Raymond Wallage, to cover up  
391 Plaintiff's reported injuries and to keep other wrong doing from Wallage's knowledge for  
392 reasons of personal gain.

393 58. Then, Defendants Katsnelson, KMC, Jackson, Bradhurst, Pizinger, Noblitt, BBP, Wheat,  
394 Rice, Chavez and Scaccianoce conspired and continued to conspire to cover up Plaintiff  
395 Morgan's injury and other wrong doings for personal gain.

396 59. The third charge here is that Defendants Katsnelson, KMC, Jackson, Bradhurst, Pizinger,  
397 Noblitt, BBP, Wheat, Stec, Rice, Chavez and Scaccianoce then profited from the acts described  
398 herein for personal gain, by the taking, removing, hiding, embezzling, or stealing of the cash and  
399 assets of Kalaco and its shareholders.

400 60. Part of this was accomplished by moving amounts of money to offshore accounts as will be  
401 proven at trial.

402 61. The personal gain from the above actions, benefited Defendants Katsnelson, KMC,  
403 Jackson, Bradhurst, Pizinger, Noblitt, BBP, Rice, Chavez and Scaccianoce

404 62. It will also be proven at trial that Defendants Pizinger, BBP, Rice and Noblitt have  
405 conspired at least three times in the past to take over companies where Defendant Noblitt placed  
406 Defendant Pizinger as a consultant, then Defendant Pizinger and BBP moved in as much of his  
407 co-conspirators as employees as possible and applicable to take over the company, then take,  
408 remove, hide, embezzle, or steal the cash and assets of the company, moving them to other  
409 accounts, some of which are offshore accounts and therefore believed by the defendants to be out  
410 of the reach of U.S. Courts.

411 63. Following through with their intent and plan, it will be shown at trial that Defendants  
412 Katsnelson, KMC, Jackson, Bradhurst, Pizinger, BBP, and Stec have moved Kalaco cash and  
413 other assets offshore to foreign countries, out of the reach of U.S. jurisdiction for recovery,  
414 thereby violating U.S. Title 18, Crimes and Criminal Procedure, Part I, Crimes, Chapter 47 Fraud  
415 and False Statements, Section 1001, and the U.S. Securities and Exchange Commission Act of  
416 1934 (the Act), Section 18, which regulates misleading statements to investors and potentials  
417 investors and various state securities laws. The specific violation here comes about by virtue of  
418 the intentional omission in bad faith of the material fact that investors' monies have been moved  
419 offshore. This amounts to intent by the defendants to conceal assets when/if Kalaco fails and is  
420 therefore a violation of Title 18, Crimes and Criminal Procedure, Part I Crimes, Chapter 47  
421 Fraud and False Statements, Section 1032, Concealment of Assets. It is further in violation of  
422 U.S. Title 18, Crimes and Criminal Procedure, Part I, Crimes, Chapter 47 Fraud and False  
423 Statements, Section 1001, and the U.S. Securities and Exchange Commission Act of 1934 (the  
424 Act), Section 18, which regulates misleading statements to investors and potentials investors and  
425 various state securities laws, and various state securities laws. The specific violation here comes  
426 about by virtue of the intentional omission in bad faith of the material fact that shareholder  
427 money has been moved offshore.

428 64. It will be shown at trial that covering up Plaintiff Morgan's reported injury played directly  
429 into defendants Katsnelson, KMC, Jackson, Bradhurst, Pizinger, BBP, Rice, and Noblitt's plans  
430 to take over then deplete Kalaco of all of its assets, violating U.S. Title 18, Crimes and Criminal  
431 Procedure, Part I, Crimes, Chapter 47 Fraud and False Statements, Section 1001, and the U.S.  
432 Securities and Exchange Commission Act of 1934 (the Act), Section 18, which regulates

433 misleading statements to investors and potentials investors and various state securities laws, and  
434 various state securities laws. The specific violation here comes about by virtue of the intentional  
435 omission in bad faith of the material fact of the takeover attempt and/or plan.

436 65. Testimony at trial will show that Defendant Katsnelson bragged to Kalaco employees about  
437 his escape plans when Kalaco fails, and that he was immune to prosecution because he had no  
438 assets. This shows knowledge by Katsnelson that he was violating U.S. Title 18, Crimes and  
439 Criminal Procedure, Part I, Crimes, Chapter 47 Fraud and False Statements, Section 1001, and  
440 the U.S. Securities and Exchange Commission Act of 1934 (the Act), Section 18, which  
441 regulates misleading statements to investors and potentials investors, and various state securities  
442 laws.

443 66. Testimony at trail will show how much distain Defendants Katsnelson, KMC, Jackson and  
444 Bradhurst had/have for Kalaco's shareholders and their fiduciary obligations to same, leading  
445 into the conspiracy to overthrow Kalaco's prior management, taking over the company, hiding  
446 wrong doing, then depleting it of all assets, leaving the shareholders with nothing for their  
447 investments, in violation of U.S. Securities and Exchange Commission Act of 1934 (the Act) and  
448 various state securities laws.

449 67. Further, it will shown at trial by the defendants named herein, by their actions and words,  
450 that their intent and action(s), while working in concert with each other, is/are to have such  
451 evidence in place as to cause the authorities to look toward the former management as  
452 responsible, thereby directing the intention away from the guilty defendants named herein. They  
453 even used some more gullible shareholders in this effort as will be shown at trial. This is in  
454 violation of the Securities Act of 1934, Section 20, Liabilities of Controlling Persons and Persons  
455 Who Aid and Abet Violations.

456 68. Further it will be proven at trail that Defendant's Katsnelson, KMC, Jackson and Bradhurst  
457 acted at the first level of this plan to take over Kalaco by recruiting and coercing Kalaco  
458 employees into a loyalty with them against the former Chairman and CEO, which also destroyed  
459 the former management's ability to effectively manage Kalaco, again violating the Securities Act  
460 of 1934, Section 20, Liabilities of Controlling Persons and Persons Who Aid and Abet  
461 Violations, and various state securities laws. Defendants Katsnelson and Jackson's acts were also  
462 in direct violation of their fiduciary duties to the shareholders.

463 *Continued...*

464 **Defendants Katsnelson, KMC, Jackson, Bradhurst, Pizinger, BBP, Rice, Stec, and**  
465 **Noblitt aid and abet, hide or destroy evidence of their conspiracy or evidence**  
466 **that may bring Kalaco to a premature failure before defendants have gotten**  
467 **as much ill gotten gains from Kalaco and its shareholders as possible.**

468 69. Plaintiff incorporates by reference the allegations of paragraph 1 through 89 of the  
469 Complaint.

470 70. Defendants named above have pulled down Kalaco's website because there were violations  
471 of U.S. Title 18, Crimes and Criminal Procedure, Part I, Crimes, Chapter 47 Fraud and False  
472 Statements, Section 1001, and the U.S. Securities and Exchange Commission Act of 1934 (the  
473 Act), Section 18, which regulates misleading statements to investors and potentials investors and  
474 various state securities laws. The specific violation under both statutes here comes about by  
475 virtue of the intentional omission in bad faith of the material fact that, the website pulled down  
476 claimed no one had ever complained or reported of an injury from the Nexalin device, and this  
477 was an intentional misstatement of material fact. This, if discovered, could have possibly have  
478 lead to premature prosecution and a premature failure of Kalaco before defendants plans to get as  
479 much out of Kalaco as possible could be fully implemented.

480 71. Defendants named above purposefully allowed Kalaco's financial books and records to be  
481 kept off Kalaco's servers where there were multiple and automatic backups made, thus allowing  
482 the financial books and records to be completely deleted and destroyed, hiding all evidence of  
483 their wrongdoing. This amounted to violations of GAAP and the associated financial laws, and  
484 because it was never disclosed to Kalaco's shareholders, amounts to an intentional error of  
485 omission of material fact, federal securities violations amounting to securities felonies.

486 72. It will also be shown at trial that the Kalaco Balance Sheet was intentionally presented to  
487 the shareholders with small type that was fuzzy and or out of focus so none of the shareholders  
488 could read it. It will be shown at trail that this was done intentionally because it the real Balance  
489 Sheet would have been shown, the Defendants felt it would have severely damaged their ability  
490 to raise more investment capital through Defendants Scaccianoce and McCabe, thereby  
491 extending the amount of time and allowing more investments to raised to increase the amount of  
492 ill gotten gains to be plundered by Defendants before their intent to allow Kalaco to fail.

493 73. Lastly, it will be proven by testimony at trial that Defendants Katsnelson, KMC, Jackson,  
494 Bradhurst, Pizinger, BBP, Rice and Chavez allowed all of Kalaco's e-mail records prior to  
495 February 2007, to be deleted from the Kalaco servers and all the redundant back up systems in  
496 place in an effort to destroy and hide evidence of their wrongdoing.

497 74. All such destruction of evidence as described above constitutes violations of Title 18, Part  
498 I, Chapter 73, #1512(c)(1), "Whoever corruptly alters, destroys, mutilates, or conceals a record,  
499 document, or other object, or attempts to do so, with the intent to impair the object's integrity or  
500 availability for use in an official proceeding..." because the destruction of such evidence covers  
501 up the other criminal activity described herein.

502 75. Further, Defendants began using their personal e-mail accounts rather than Kalaco e-mail  
503 for communication between them to avoid future disclosure or discovery attempts by civil or  
504 criminal investigators in violation of Title 18, Part I, Chapter 73, #1512(c)(1) as above.

505 **Defendants Kalaco, Katsnelson, Jackson, Pizinger, conspire with Beauchamp, and Lewis &**  
506 **Roca attempt to keep the truth from the shareholders, hide, bury or destroy evidence, and**  
507 **take evidence away from the possession of witnesses who may be talking to federal and**  
508 **state law enforcement authorities ,and gain an unfair marketing advantage.**

509 76. Plaintiff incorporates by reference the allegations of paragraph 1 through 75 of the  
510 Complaint.

511 77. Upon knowledge and belief, the Defendants named above have conspired to hide, bury, or  
512 destroy evidence by filing frivolous and untrue legal claims against Plaintiff Morgan, and  
513 witnesses Ray Wallage, Senna Wallage, Valery P. Lebedev and Mrs. Lebedev, and the TES  
514 Center in St. Petersburg, Russia. As an example of the false legal claims made was that Ray  
515 Wallage and Senna Wallage had a copy of Kalaco's shareholder list and supplied it to Plaintiff  
516 Morgan and to Valery P. Lebedev so they could contact Kalaco's shareholders with false and  
517 misleading information.

518 78. In this legal action, Defendants went so far as to request the court to make Plaintiff  
519 Morgan, Wallage and Lebedev turn over all evidence they may or may not have had in their  
520 possession so they could not give it to law enforcement authorities. This is a direct violation of  
521 US Title 18, Part I, Chapter 73, Section 1512(a)(2), and a violation of Title 18, Part I, Section  
522 1512(d)(1) and (2) .

523 79. Further the legal action was used in an attempt to discover which enforcement agencies and  
524 investigators had been contacted, if any, by Plaintiff Morgan, and witnesses, Wallage, Lebedev  
525 and the TES Center further violating US Title 18, Part I, Chapter 73, Section 1512(a)(2), and  
526 Section 1512(d)(1) and (2).

527 80. Further, by including witness Lebedev and the TES Center, it would give Kalaco and unfair  
528 marketing advantage against Lebedev and the TES Center, because the action wanted all  
529 communication between witness Wallage, Lebedev and the TES center turned over to Kalaco



530 and its attorney, when any business relationship between witness Wallage, Lebedev and the TES  
531 Center has no relationship to Kalaco.

532 81. Such acts by Defendants also interfere with witness Wallage's ability to make a living as a  
533 business consultant if he has some business relationship with witness Lebedev and/or the TES  
534 Center.

535 82. Such acts by the Defendants, should any of them have already approached and gone to  
536 various law enforcement agencies as Plaintiff Morgan has, with evidence of wrong doing by the  
537 Defendants may be seen as witness and evidence tampering per US Title 18, Part I, Chapter 73,  
538 Section 1512(a)(2) and Section 1512(d)(1) and (2) through intimidation with the their legal  
539 action if none other.

540 **Kalaco, Katsnelson, KMC, Jackson, Bradhurst, Pizinger, BBP, Scaccianoce, Payne,**  
541 **Beuachamp and Lewis & Roca conspire to violate shareholder rights**  
542 **to attend an annual shareholders meeting.**

543 83. Plaintiff incorporates by reference the allegations of paragraph 1 through 82 of the  
544 Complaint.

545 84. Plaintiff Morgan is a Kalaco shareholder, holding 100 shares of Kalaco Scientific Common  
546 stock acquired in December 2005. Plaintiff Morgan planned to attend the annual meeting of  
547 Kalaco shareholders February 10, 2007. The Defendants named above all conspired to keep  
548 Plaintiff Morgan from attending, and their efforts did prevent Plaintiff Morgan from attending  
549 the shareholder meeting, in violation of California, Nevada, and US SEC laws and regulations to  
550 be identified and proven at trial. Prior to the meeting, Defendant Pizinger e-mailed Plaintiff  
551 Morgan, with a copy to enforcement@sec.gov and told Plaintiff Morgan that he would not be  
552 allowed to attend the meeting. Defendant Payne's portion of this was witnessed by City of  
553 Irvine, California Certified Law Enforcement Officer, Overbeck, and Defendant Payne, upon  
554 information and belief was working on the advice of the other Defendants.

555 **Kalaco, Katsnelson, Jackson, Pizinger, Beuachamp, Wilkins, Hernandez,**  
556 **Lewis & Roca, and Defendant Jennifer Morgan, aided, abetted and**  
557 **conspired against Plaintiff William Morgan.**

558 85. Plaintiff incorporates by reference the allegations of paragraph 1 through 84 of the  
559 Complaint.

560 86. The Defendants named above, per Jennifer Morgan's own admittance, have conspired  
561 against Plaintiff William Morgan and violated numerous laws, including but may not be limited  
562 to the U.S. Health Insurance Portability and Accountability Act of 1996 (HIPAA), Public Law

563 104-191, Sections 261 through 264 and the associated publicized standards. As an example of  
564 this action, Jennifer Morgan conspired, aided and abetted with Amy Wilkins of the Lewis &  
565 Roca law firm, to cause confidential, and proprietary medical information to fall into the hands  
566 of Kalaco and its attorneys, in violation of the aforesaid HIPAA regulations. This is but another  
567 example of how Kalaco and its legal team avoid Kalaco's legal mandate to report a claim of  
568 injury as required by U.S. CFR 21 Part 803.

569 **All Named Defendants, by Virtue of Their Conspiratorial Activities,**  
570 **Their Aiding and Abetting in the Violation of Multiple Federal and State Statutes,**  
571 **Have Committed Violations of the RICO Act.**

572 87. Plaintiff incorporates by reference the allegations of paragraph 1 through 86 of the  
573 Complaint.

574 88. It is shown above, and will be proven at trial, that all of the named defendants, by and  
575 through their cooperation, conspiracy, aiding and abetting of each other for the control of an  
576 enterprise, specifically Kalaco, engaged in, or the activities of which affect interstate and/or  
577 foreign commerce, have committed a pattern of racketeering activity in violation of and  
578 prohibited by U.S. Title 18, Part I, Chapter 1962(a), 1962(b), 1962 (c), and 1962(d), commonly  
579 known as the RICO Act.

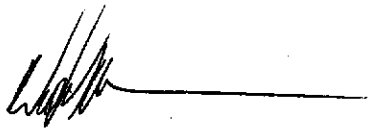
580 **REQUEST and DEMAND FOR RELIEF**

581 WHEEFORE, Plaintiff requests and demands judgment against all the Defendants, collectively and  
582 individually as follows:

- 583 A. Because Defendants used a non-FDA approved or cleared medical device on Plaintiff,  
584 Plaintiff is due unspecified monetary damages as a result of this illegal act.
- 585 B. Because Defendants illegally prescribed the use of the Nexalin device to the Plaintiff,  
586 Plaintiff is due unspecified monetary damages as a result of this illegal act.
- 587 C. Because Plaintiff was severely and permanently injured by defendants in committing  
588 illegal acts as above, then covered up the illegal acts and injuries, Plaintiff requests  
589 unspecified monetary damages as a result of this illegal act.
- 590 D. Because Defendants covered up Plaintiff's report of injury in violation of federal  
591 statutes, perhaps causing further injury, Plaintiff is due unspecified monetary  
592 damages as a result of this illegal act.
- 593 E. Because Defendants actions denied Plaintiff of timely medical care regarding his  
594 injuries, Plaintiff is due unspecified monetary damages as a result of this illegal act.

- 595 F. Because of the heinous, cruel, and criminal nature of Defendant's violations, Plaintiff  
596 is due unspecified monetary damages as a result of this illegal act.
- 597 G. Because Plaintiff has suffered with constant and severe headaches, a condition where  
598 light causes severe additional pain, and seizures, Plaintiff is do unspecified monetary  
599 damages for pain and suffering.
- 600 H. For interest from the date of judgment at the maximum allowable rate until the  
601 judgment is satisfied through payment or collection;
- 602 I. For Plaintiff's costs, expenses, and attorney's fees incurred herein;
- 603 J. For prejudgment interest at the highest legal rate from the date of the offenses herein  
604 until paid on all sums adjudged due; and
- 605 K. For such other and further relief as the court or jury deems just and proper  
606 considering the illegal, heinous and intentional nature of the acts herein.
- 607 L. Because Defendants are depleting Kalaco in a plan to eventually leave it bankrupt, it  
608 is requested that the court immediately appoint a trustee over Kalaco to manage all of  
609 its affairs. In fact this civil action alone by Plaintiff, likely places Kalaco in an  
610 insolvent state, therefore this request is deemed very timely before Defendants plans  
611 to completely embezzle or steal all of Kalaco's assets can be fulfilled.
- 612 M. Upon judgment, Plaintiff respectfully asked the court or jury to do a criminal referral  
613 to the Corporate Fraud Task Force of the U.S. Department of Justice, for investigation  
614 and prosecution.
- 615 N. For the Court and Defendant's help in obtaining workmen's compensation benefits  
616 because Plaintiff's injury was work related.

617  
618 Dated this 25<sup>th</sup> day of June, 2007  
619

620 

621  
622 William V. Morgan  
623 16019 N. 23<sup>rd</sup> Drive  
624 Phoenix, AZ 85023  
625 Phone (480) 593-8627