

1 The Superior Court Case is Case No.: SS023024, *Lighthouse Legal Finance, LLC. v. Arthur*
2 *Conan Doyle and Does 1 through 10, inclusive.*

3 **1- PROCEDURAL HISTORY AND TIMELINESS OF REMOVAL**

4 2. On December 26, 2012, Plaintiff filed the case of *Lighthouse Legal Finance, LLC. v.*
5 *Arthur Conan Doyle and Does 1 through 10, inclusive*, as Case No.:SS023034 in the Superior
6 Court of the State of California of Los Angeles County, Stanley Mosk Courthouse. There have
7 been no proceedings in the State Court and no answer filed by the Defendant as of this date.
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9 **2- CONSENT TO REMOVAL**

10 3. Because there are no other defendants in this action, no consent to removal is necessary.
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12 **3 - ALLEGATIONS OF THE COMPLAINT**

13 4. This action is an attempt to compel arbitration to collect a usurious loan by way of a
14 contract between two parties and the Plaintiff. The contract was not executed by one of the
15 parties. The contract fails between the other two parties and the Plaintiff now attempts to collect
16 under quasi-contract for a **loan sharking** transaction at about **500% A.P.R.** Only one of the two
17 indispensable parties is a signatory to the contract which makes the contract a legal nullity. This
18 makes Plaintiff's demand to compel arbitration an undisguised and un-obfuscated and clear
19 attempt to collect a loan sharking transaction against the Defendant who has at all times been a
20 financially destitute and a disabled person under the ADA. The Plaintiff seeks to compel the
21 Defendant, who is presently and has at all times been destitute, to pay to arbitrate this legally
22 uncollectible claim, notwithstanding the fact that no valid contract exists between Plaintiff and
23 Defendant; because of the failure and refusal of the third party to sign the contract.
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1 **4 - JURISDICTION OF DEFENDANT SIR ARTHUR CONAN DOYLE'S NOTICE OF**
2 **REMOVAL**

3 5. This action is within the original jurisdiction of this Court, and removal is therefore
4 proper under 42 USC § 12101, Americans With Disabilities Act; 15 U.S.C. § 1692, Federal
5 Debt Collection Practices Act; 18 USC § 1961, Rico, Extortionate Credit Transaction; 18 U.S.C.
6 §§891-894, the Extortionate Credit Transaction Act; 18 U.S.C. §1951, the Hobbs Act; 18 U.S.C.
7 §1341, the Mail Fraud Act; 12 USC §86, Usurious Interest, 15 U.S.C. §1601 Truth in Lending
8 Act; 15 U.S.C. §1602.
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11 **5 - VENUE**

12 6. Venue: The venue of the Federal District Court of the Central District of California is
13 proper as all of the area covered by the Stanley Mosk Courthouse's venue is within the venue of
14 said District Court.
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16 **6 - DIVERSITY**

17 7. Diversity. The required diversity of citizenship under CAFA is satisfied because Plaintiff
18 is a domiciliary of the state of New Jersey and Defendant is a domiciliary of the State of
19 California. The Amount in controversy at the time of trial is estimates to be in excess of \$75,000.
20 The Defendant is informed and believes that the monies loaned to Defendant in this loan
21 sharking transaction are funds that are being laundered via a pattern and practice of loan sharking
22 transactions by the plaintiff ultimately benefitting members of the Gambino Crime Family.
23


24 **7 - CONCLUSION**

25 8. For all of the reasons stated above, this action is within the original jurisdiction of this
26 Court pursuant to 28 U.S.C. § 1332(d). Accordingly, this action is removable pursuant to 28
27 U.S.C. § 1441(a) and § 1453. WHEREFORE, Defendant Sir Arthur Conan Doyle, erroneously
28

1 sued as Arthur Conan Doyle gives notice that the above-described action pending against it in
2 the Superior Court for the County of Los Angeles, Stanley Mosk Courthouse is removed to this
3 Court. Dated: April 15, 2013.

4 To Barry Rothman,
5 Attorney for Lighthouse Legal Finance, LLC.
6 1901 Avenue of the Stars, STE 370
7 Los Angeles CA 90067

8 Dated: April 15, 2012

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By: Sir Arthur Conan Doyle, Defendant
in Pro Se Erroneously sued as Arthur
Conan Doyle

1 Sir Arthur Conan Doyle
1242 N Fairfax Ave
2 West Hollywood, CA 90046

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4 Defendant in Pro Per
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7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **FOR THE COUNTY OF LOS ANGELES, STANLEY MOSK COURTHOUSE**

9
10 **Lighthouse Legal Finance, LLC,**) Case No.: SS023024
11 **Plaintiff,**)
12 **VS.**) **DEFENDANT ARTHUR CONAN**
13 **Arthur Conan Doyle, and Does 1 through**) **DOYLE'S NOTICE OF REMOVAL**
14 **10 inclusive,**) Verified Petition to Compel Arbitration filed
15 **Defendants,**) 12/25/2012
16)

17 TO PLAINTIFF, THEIR COUNSEL OF RECORD, AND THE CLERK OF THE
18 SUPERIOR COURT OF THE STATE OF CALIFORNIA, FOR THE COUNTY OF LOS
19 ANGELES, STANLEY MOSK COURTHOUSE:
20

21 TAKE NOTICE that on April 15, 2013, Defendant Arthur Conan Doyle filed a Notice of
22 Removal of this action in the United States District Court for the Southern District of California.
23 A true and correct copy of said Notice of Removal is attached hereto as Exhibit A and is served
24 and filed herewith.

25 TAKE FURTHER NOTICE that, pursuant to 28 U.S.C. Sec. 1446, the filing of said
26 Notice affects the removal of this action to the Federal District Court, and *this Court is directed*
27 /

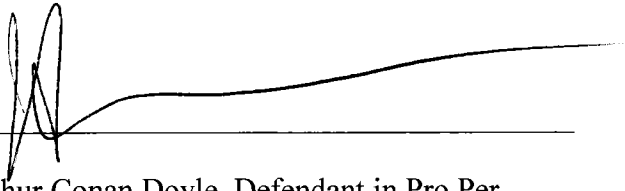
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to precede no further unless this case is remanded, per 28 U.S.C. Sec. 1446(d).

Dated April 15, 2013



A handwritten signature in black ink, appearing to read 'Arthur Conan Doyle', is written over a horizontal line. The signature is stylized and somewhat cursive.

Arthur Conan Doyle, Defendant in Pro Per

Proof of Service

I Manuel Rios am over the age of 18 and not a party to *Lighthouse Legal Finance, LLC. v. Arthur Conan Doyle and DOES 1 through 10 inclusive,*

I served the following documents:

DEFENDANT ARTHUR CONAN DOYLE'S NOTICE OF REMOVAL (Federal Court)
DEFENDANT ARTHUR CONAN DOYLE'S NOTICE OF REMOVAL (State Court)

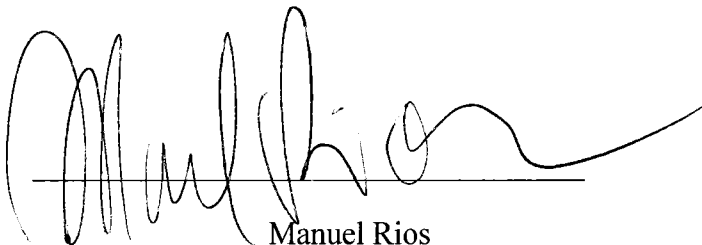
On Monday, April 15, 2013 I served the above documents by substituted service upon Barry Rothman, Attorney at Law, 1901 Avenue of the Stars, STE 370, Los Angeles CA 90067 and by then depositing a copy of the above documents in the United States Mail, at Los Angeles, CA in a postpaid envelope on April 15, 2013.

The envelope was addressed to Barry Rothman, Attorney at Law, 1901 Avenue of the Stars, STE 370, Los Angeles CA 90067.

My business Address is 5850 W Third St. #221, Los Angeles, Ca 90036

I declare under Penalty of Perjury, under the laws of the State of California that the foregoing is true and correct.

April 15, 2013



Manuel Rios

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

<p>I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) LightHouse Legal FRANE LLC 1901 Ave of the Stars #370 LA CA 90067</p>	<p>DEFENDANTS Arthur Cowan Doyle 1242 N Fairfax Ave West Hollywood CA 90046</p>
<p>(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Barry K. Roman 1901 Ave of the Stars #370 LA CA 90067</p>	<p>Attorneys (If Known) IN PRO SE</p>

<p>II. BASIS OF JURISDICTION (Place an X in one box only.)</p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> Federal Question (U.S. Government Not a Party)</p> <p><input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)</p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.)</p> <table style="width:100%;"> <tr> <td style="width:33%;">Citizen of This State</td> <td style="width:10%;">PTF <input type="checkbox"/> 1</td> <td style="width:10%;">DEF <input checked="" type="checkbox"/> 1</td> <td style="width:33%;">Incorporated or Principal Place of Business in this State</td> <td style="width:10%;">PTF <input type="checkbox"/> 4</td> <td style="width:10%;">DEF <input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td>PTF <input checked="" type="checkbox"/> 2</td> <td>DEF <input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td>PTF <input type="checkbox"/> 5</td> <td>DEF <input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td>PTF <input type="checkbox"/> 3</td> <td>DEF <input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td>PTF <input type="checkbox"/> 6</td> <td>DEF <input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input checked="" type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4	Citizen of Another State	PTF <input checked="" type="checkbox"/> 2	DEF <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	PTF <input type="checkbox"/> 5	DEF <input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3	DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6	DEF <input type="checkbox"/> 6
Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input checked="" type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4														
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Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3	DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6	DEF <input type="checkbox"/> 6														

IV. ORIGIN (Place an X in one box only.)

1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from another district (specify): 6 Multi-District Litigation 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: Yes No **MONEY DEMANDED IN COMPLAINT: \$** 7,000

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

VII. NATURE OF SUIT (Place an X in one box only.)

<p>OTHER STATUTES</p> <p><input type="checkbox"/> 400 State Reapportionment</p> <p><input type="checkbox"/> 410 Antitrust</p> <p><input type="checkbox"/> 430 Banks and Banking</p> <p><input type="checkbox"/> 450 Commerce/ICC Rates/etc.</p> <p><input type="checkbox"/> 460 Deportation</p> <p><input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations</p> <p><input type="checkbox"/> 480 Consumer Credit</p> <p><input type="checkbox"/> 490 Cable/Sat TV</p> <p><input type="checkbox"/> 810 Selective Service</p> <p><input type="checkbox"/> 850 Securities/Commodities/Exchange</p> <p><input type="checkbox"/> 875 Customer Challenge 12 USC 3410</p> <p><input type="checkbox"/> 890 Other Statutory Actions</p> <p><input type="checkbox"/> 891 Agricultural Act</p> <p><input type="checkbox"/> 892 Economic Stabilization Act</p> <p><input type="checkbox"/> 893 Environmental Matters</p> <p><input type="checkbox"/> 894 Energy Allocation Act</p> <p><input type="checkbox"/> 895 Freedom of Info. Act</p> <p><input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice</p> <p><input type="checkbox"/> 950 Constitutionality of State Statutes</p>	<p>CONTRACT</p> <p><input type="checkbox"/> 110 Insurance</p> <p><input type="checkbox"/> 120 Marine</p> <p><input type="checkbox"/> 130 Miller Act</p> <p><input type="checkbox"/> 140 Negotiable Instrument</p> <p><input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment</p> <p><input type="checkbox"/> 151 Medicare Act</p> <p><input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans)</p> <p><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits</p> <p><input type="checkbox"/> 160 Stockholders' Suits</p> <p><input type="checkbox"/> 190 Other Contract</p> <p><input type="checkbox"/> 195 Contract Product Liability</p> <p><input type="checkbox"/> 196 Franchise</p> <p>REAL PROPERTY</p> <p><input type="checkbox"/> 210 Land Condemnation</p> <p><input type="checkbox"/> 220 Foreclosure</p> <p><input type="checkbox"/> 230 Rent Lease & Ejectment</p> <p><input type="checkbox"/> 240 Torts to Land</p> <p><input type="checkbox"/> 245 Tort Product Liability</p> <p><input type="checkbox"/> 290 All Other Real Property</p>	<p>TORTS</p> <p>PERSONAL INJURY</p> <p><input type="checkbox"/> 310 Airplane</p> <p><input type="checkbox"/> 315 Airplane Product Liability</p> <p><input type="checkbox"/> 320 Assault, Libel & Slander</p> <p><input type="checkbox"/> 330 Fed. Employers' Liability</p> <p><input type="checkbox"/> 340 Marine</p> <p><input type="checkbox"/> 345 Marine Product Liability</p> <p><input type="checkbox"/> 350 Motor Vehicle</p> <p><input type="checkbox"/> 355 Motor Vehicle Product Liability</p> <p><input type="checkbox"/> 360 Other Personal Injury</p> <p><input type="checkbox"/> 362 Personal Injury-Med Malpractice</p> <p><input type="checkbox"/> 365 Personal Injury-Product Liability</p> <p><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability</p> <p>IMMIGRATION</p> <p><input type="checkbox"/> 462 Naturalization Application</p> <p><input type="checkbox"/> 463 Habeas Corpus-Alien Detainee</p> <p><input type="checkbox"/> 465 Other Immigration Actions</p>	<p>TORTS</p> <p>PERSONAL PROPERTY</p> <p><input type="checkbox"/> 370 Other Fraud</p> <p><input type="checkbox"/> 371 Truth in Lending</p> <p><input type="checkbox"/> 380 Other Personal Property Damage</p> <p><input type="checkbox"/> 385 Property Damage Product Liability</p> <p>BANKRUPTCY</p> <p><input type="checkbox"/> 422 Appeal 28 USC 158</p> <p><input type="checkbox"/> 423 Withdrawal 28 USC 157</p> <p>CIVIL RIGHTS</p> <p><input type="checkbox"/> 441 Voting</p> <p><input type="checkbox"/> 442 Employment</p> <p><input type="checkbox"/> 443 Housing/Accommodations</p> <p><input type="checkbox"/> 444 Welfare</p> <p><input type="checkbox"/> 445 American with Disabilities - Employment</p> <p><input checked="" type="checkbox"/> 446 American with Disabilities - Other</p> <p><input type="checkbox"/> 440 Other Civil Rights</p>	<p>PRISONER PETITIONS</p> <p><input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus</p> <p><input type="checkbox"/> 530 General</p> <p><input type="checkbox"/> 535 Death Penalty</p> <p><input type="checkbox"/> 540 Mandamus/Other</p> <p><input type="checkbox"/> 550 Civil Rights</p> <p><input type="checkbox"/> 555 Prison Condition</p> <p>FORFEITURE / PENALTY</p> <p><input type="checkbox"/> 610 Agriculture</p> <p><input type="checkbox"/> 620 Other Food & Drug</p> <p><input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881</p> <p><input type="checkbox"/> 630 Liquor Laws</p> <p><input type="checkbox"/> 640 R.R. & Truck</p> <p><input type="checkbox"/> 650 Airline Regs</p> <p><input type="checkbox"/> 660 Occupational Safety /Health</p> <p><input type="checkbox"/> 690 Other</p>	<p>LABOR</p> <p><input type="checkbox"/> 710 Fair Labor Standards Act</p> <p><input type="checkbox"/> 720 Labor/Mgmt. Relations</p> <p><input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act</p> <p><input type="checkbox"/> 740 Railway Labor Act</p> <p><input type="checkbox"/> 790 Other Labor Litigation</p> <p><input type="checkbox"/> 791 Empl. Ret. Inc. Security Act</p> <p>PROPERTY RIGHTS</p> <p><input type="checkbox"/> 820 Copyrights</p> <p><input type="checkbox"/> 830 Patent</p> <p><input type="checkbox"/> 840 Trademark</p> <p>SOCIAL SECURITY</p> <p><input type="checkbox"/> 861 HIA (1395ff)</p> <p><input type="checkbox"/> 862 Black Lung (923)</p> <p><input type="checkbox"/> 863 DIWC/DIWW (405(g))</p> <p><input type="checkbox"/> 864 SSID Title XVI</p> <p><input type="checkbox"/> 865 RSI (405(g))</p> <p>FEDERAL TAX SUITS</p> <p><input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)</p> <p><input type="checkbox"/> 871 IRS-Third Party 26 USC 7609</p>
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CV 13 - 2625

FOR OFFICE USE ONLY: Case Number: _____
AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? No Yes
If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? No Yes
If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) A. Arise from the same or closely related transactions, happenings, or events; or
 B. Call for determination of the same or substantially related or similar questions of law and fact; or
 C. For other reasons would entail substantial duplication of labor if heard by different judges; or
 D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.
 Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	Camden NJ.

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.
 Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles CA,	

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.

Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER): _____ Date 4-15-2013

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))