

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JOHN B. THOMPSON,

Plaintiff,

v.

Case No. 07-21256 (Judge Adalberto Jordan)

THE FLORIDA BAR and  
DAVA J. TUNIS,

Defendants.

**PLAINTIFF'S MOTION FOR LEAVE TO AMEND COMPLAINT**

COMES NOW plaintiff, John B. Thompson, hereinafter Thompson, as an attorney on his own behalf, and hereby moves the court for leave to amend his complaint herein, stating:

Beginning twenty years ago and most recently since August 2004, Ft. Lauderdale attorney Norm Kent, while active in the ACLU, of all things, has been threatening Thompson with various forms of legal mayhem in order to intimidate Thompson's "petition speech" under the First Amendment.

Kent has recently threatened Thompson with "outing" him as a closeted homosexual with an e-mail Kent entitled "The Gay Christian Cometh?"

Kent just this week publicly threatened Thompson, at his gay porn portal at [www.nationalgaynews.com](http://www.nationalgaynews.com) (the court labeled material there "obscenity"), with yet another lawsuit in retaliation for Thompson's sharing this court's "obscenity" statement with law enforcement officials. This is clearly fully protected "petition speech" under the First Amendment.

Now, just this morning, this person who thinks everyone but he has First Amendment protections, has yet again emailed Thompson, after he has been asked and told multiple times to stop emailing Thompson, that he is now going to sue Thompson for sending a letter to Kent, asking that he give it to his client. Kent claims that is an attempt to communicate with his client behind his back. *Pause.*

Thompson, doesn't know if this latest stunt stems from Mr. Kent's inhalation of what he himself claims is his favorite intoxicant, or if he's serious. Either way, this fellow appears to be in serial violation of federal and state laws, in his efforts to intimidate the undersigned from exercising his First Amendment rights.

Interestingly, there is also what the undersigned considers to be RICO activity, as the threat this week to punish Thompson for writing the US Attorney about his "obscenity" (this court's word) trafficking is extortion. That is a RICO predicate act, as is trafficking in "obscenity." Kent has used the methods of the Mafia for awhile, engaging in underlying criminal activity, which now includes disseminating obscenity to people of all ages, and then engaging in threats to protect that underlying criminal activity. John Gotti would be proud.

The court can read the third amended complaint herein and see that Mr. Kent has been at the very center of The Bar's harassment of Thompson through Bar complaints. In fact, it was Kent's SLAPP Bar complaint that kicked this all off. His complaint, despite The Bar's promise to do so, has still not been disposed of. Yet another subterfuge by The Bar.

Kent and his "radical gay agenda" brethren on the Board of Governors, in the persons of Ben Kuehne and Steven Chaykin, both of whom have "served" as Thompson's

ideologically compromised “designated reviewers” help explain why and how Kent and The Bar are doing this. Kuehne himself resuscitated the Kent Bar complaint after The Bar’s own outside investigator David Pollack of Stearns Weaver said it was baseless.

One of Mr. Kent’s own clients has stated, publicly, that Mr. Kent “is involved with runaway boys.” Mr. Kent has acknowledged that his client has said that and has an explanation that he has a camp, or something, for boys.

Mr. Kent has also acknowledged, now twice, that he consumes marijuana without a medical prescription. Thompson does not know if Mr. Kent threatens Thompson, in violation of federal civil rights laws, to protect his own criminal activity or if Mr. Kent simply has nothing better to do. Either way, it is criminal activity which Thompson has a right to have a federal judge and jury address. Thompson has grown tired of threats, which are now tied, by Kent himself, to this court’s rulings. This court cannot say that they are not tied to this “transaction.”

WHEREFORE, since Mr. Kent is presently collaborating with The Bar, and actively and openly so, even to the point of monitoring this court file and putting out regular “news updates” on his cesspool site about what this court is doing re The Bar, Thompson respectfully requests and moves that Thompson be permitted to amend his complaint to secure the federal remedies Thompson has available to him. Kent and his “radical gay agenda” on the Board of Governors, in the persons of Ben Kuehne and Steven Chaykin,

I HEREBY CERTIFY that this has been served upon record counsel this 7<sup>th</sup> day of October, 2007, electronically.

/s/ JOHN B. THOMPSON, Plaintiff  
Attorney, Florida Bar #231665  
1172 South Dixie Hwy., Suite 111  
Coral Gables, Florida 33146  
Phone: 305-666-4366  
[amendmentone@comcast.net](mailto:amendmentone@comcast.net)