

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, JOHN HARKNESS,
AND FRANK ANGONES,

Defendants.

**PLAINTIFF'S NOTICE TO THE COURT RE NEW CRIMINAL ACTIVITY BY
SLAPP BAR COMPLAINANT BLANK ROME**

COMES NOW plaintiff, John B. Thompson, hereinafter Thompson, as an attorney on his own behalf, and provides notice to the court as follows:

The primary SLAPP Bar complainant against plaintiff herein, the Blank Rome law firm which represents Take-Two, the makers of the *Grand Theft Auto* and *Manhunt* has now demonstrably violated federal criminal civil rights laws by having its Philadelphia partner Rebecca Ward, send Thompson the below e-mail:

----- Original Message -----

From: [Ward, Rebecca](#)

To: [Jack Thompson](#)

Cc: [Camerik, Howard M.](#)

Sent: Tuesday, October 30, 2007 8:25 AM

Subject: FW:

Mr. Thompson,

We will not revisit your false claims regarding age verification. In regards to your other statement, you appear to be claiming that a content descriptor of "strong sexual content" -- which appears on numerous games -- triggers liability under statutes barring a criminal distribution of materials to minors. As you are an attorney, you know that the standard to trigger such laws is extremely high and likely impossible for an M rated video game. Any claims that this material -- which you have not even seen -- is actionable under civil or criminal law may violate state laws regarding business libel, as well as your settlement agreement

with our client. If you make any such claims publicly -- including any additional correspondence with the press -- our client may be forced to take action against you.

There is no “agreement” that prohibits Thompson from alerting law enforcement officials to possible criminal distribution of “sexual material harmful to minors,” nor can there be, as such agreements are contrary to public policy. Thompson signed no such agreement. Blank Rome knows this.

Secondly, asking law enforcement officials to make a decision in this regard (see prior filing today with this court of the letter to law enforcement officials) is fully protected petition speech. Blank Rome knows this.

Further, Blank Rome also knows that asking the age of a minor on-line is not age verification, anymore than asking Ms. Ward if she represents the porn-to-kids industry is not some verification of her morality. Real age verification requires the providing of government ID data, which is done with Internet sales of alcohol, tobacco, and firearms. Take-Two is actively selling *Manhunt 2* and its other “Mature” games to people of all ages with no age verification.

Plaintiff is today contacting the Department of Justice in order to seek a criminal prosecution of Ms. Ward, of Blank Rome, and of Take-Two for its clear violation of 18 USC 241, 242 in this brazen effort, by intimidation, to chill plaintiff’s First Amendment petition rights.

This is precisely what Blank Rome and Take-Two are doing with their SLAPP Bar complaints that are the subject of this federal lawsuit, and this court ignores that fact at peril to public perceptions of its fairness and acumen.

I HEREBY CERTIFY that this has been served upon record counsel this 30th
day of October, 2007, electronically.

A handwritten signature in black ink, appearing to read 'jbt', with a long horizontal stroke extending to the right.

/s/ JOHN B. THOMPSON, Plaintiff
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