

EXHIBIT C

1 Pro Per
2 Michael E. Spreadbury
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FILED
DEBBIE HARMON, CLERK

MAY 07 2010

myself
DEPUTY

6 MONTANA 21ST JUDICIAL DISTRICT COURT
7 RAVALLI COUNTY

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10 MICHAEL E. SPREADBURY) Cause No: DV-10-222 /4
11 Plaintiff)
12 v.) AMENDED COMPLAINT
13 ANGELA B. WETZSTEON)
14 GEORGE H. CORN)
15 Defendants)

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17 This case is for the intentional infliction of emotional distress.

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Factual Background

19 Plaintiff, acting on his own behalf, pleads and alleges as follows:

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1. Plaintiff Michael Spreadbury is an individual and resides at 700 South 4th Street in the City of Hamilton, County of Ravalli, State of Montana.

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2. Defendants Angela Wetzsteon and George Corn are individuals with business address of 205 Bedford St. Suite C in the City of Hamilton, County of Ravalli, State of Montana.

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3. On or about August 8, 2007 Defendants Wetzsteon and Corn obtained an arrest warrant from Judge Bailey of Justice Court of Ravalli County for Plaintiff's failure to appear on TK 2006-3068. Plaintiff appeared through retained attorney for misdemeanor in Justice Court, Ravalli County on this date. It is a well established appearance in misdemeanor

28 court that a defendant can appear through an attorney as it is established in Montana Code
29 as MCA 46-16-122. It should be a well known practice for officiating Judge and a
30 practicing attorney in a Montana Courtroom.

31 4. Defendant Wetzsteon was a law student, however, Wetzsteon as a paid student intern at
32 The Ravalli County Attorney Office (RCAO) and had a duty to be aware of Montana
33 Code and practices, as did George H. Corn. Wetzsteon was not licensed to practice law
34 in August 2007. By way of respondeat superior, George H. Corn is accountable for
35 Defendant Wetzsteon in an administrative and supervisory capacity. Wetzsteon appeared
36 at plaintiff trial on behalf of the RCAO on August 8, 2007 when arrest warrant was
37 obtained.

38 5. Defendant Wetzsteon asked Judge Bailey of Ravalli Justice Court to grant evidence
39 outside of discovery for Plaintiff's August 8, 2007 trial. This evidence was contrived,
40 and intended to convict Plaintiff outside rules of criminal procedure. An officer of the
41 court, or a representative of the court as with the case of Defendant Wetzsteon should
42 know the rules of the court, and the bounds of discovery in a Montana Courtroom.

43 6. Prosecutors George H. Corn, Bill Fullbright, and T. Geoff Mahar originally participated
44 in the prosecution of Plaintiff for TK-2006-3068. In Fullbright's motion to continue of
45 July 30, 2007 he mentions Plaintiff's speedy trial would be violated, yet asked for a
46 continuance. Corn's motion to reconsider of the same date would place Defendant Corn
47 as knowing that Plaintiff's right would be violated. Original date of trial was July 31,
48 2007 and RCAO continued trial for only 8 days knowing Defendant would be out of
49 state, setting up the platform for the false arrest warrant. Corn assigned, or knew of the
50 assignment of Angela Wetzsteon as representative from the Ravalli County Attorney
51 office acting as "State's attorney" yet a student intern at Plaintiff trial on August 8, 2007.

52 7. From August 8, 2007 to May 5, 2010 the Ravalli County Attorney office did misrepresent
53 the correct spelling of Defendant Angela Wetzsteon's name, in an effort to misrepresent
54 information to the Plaintiff in this case, and hide the identity of a public court officer in
55 the State of Montana. This misrepresentation of the Defendants identity does show
56 evidence of wrongdoing on the part of the Ravalli County Attorney Office.

57 8. The acts of the Defendants described in paragraph 3 through 7 of this Complaint were
58 done willfully, maliciously, outrageously, deliberately, and purposely with the intention
59 to inflict emotional distress upon Plaintiff and were done in reckless disregard of the
60 probability of causing Plaintiff emotional distress, and these acts did in fact result in
61 severe and extreme emotional distress.

62 9. As a direct and proximate result of the Defendant's acts alleged herein, Plaintiff was
63 caused to incur severe and grievous mental and emotional suffering, fright, anguish,

64 shock, nervousness, and anxiety. Plaintiff continues to be fearful, anxious, and nervous,
65 specifically but not exclusively regarding the future possibility of wrongful arrest and
66 prosecution. For this harm, Plaintiff requests compensatory damages in the amount of
67 \$350,000.00

68 10. As a proximate result of the Defendant's actions alleged herein, Plaintiff has had his
69 capacity to pursue an established course of life destroyed by Defendants. Plaintiff has
70 suffered permanent damage to lifestyle and professional life as a result of Defendant
71 activity described in paragraph 3 through 5. Plaintiff suffered severe emotional distress
72 has inflicted as a result.

73 11. This severe emotional distress was a reasonably foreseeable consequence of actions by
74 Defendants on or about August 8, 2007. Defendants did not take reasonable care to avoid
75 wrongful arrest of Plaintiff, and appeared to have contrived the arrest of the Plaintiff
76 giving no conscience to their duties as officers of the court, or in the case of Defendant
77 Wetzsteon acting agent of the court. Warrant from Judge Bailey from court on August 8,
78 2007 cited Title 3 in Montana Code which is not a crime, and Plaintiff appeared through
79 retained attorney on August 8, 2007 in Ravalli Justice Court.

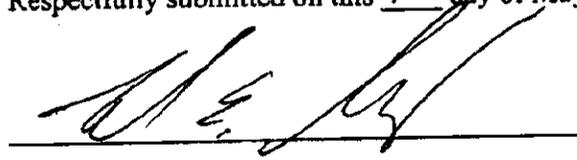
80 WHEREFORE, Plaintiff Michael E. Spreadbury prays for judgment against Defendants
81 Angela Wetzsteon, and George H. Corn as follows:

- 82 1. Compensatory Damages in the amount of \$ 350,000.00
83 2. Punitive Damages in the amount of \$50,000.00
84 3. Preventative relief through the court in the form of injunctive relief:

85 Defendants are to cease and desist malicious attack on Plaintiff's person to the
86 satisfaction of the Honorable Court. Plaintiff is entitled to equal protection and due
87 process in the courts, and as a citizen. The malicious destruction of Plaintiff by
88 Defendants is recognized by the Court, and it will intervene on behalf of Plaintiff.

- 89 4. Costs associated with the suit and such other relief as the Court deems proper.

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91 Respectfully submitted on this 7th day of May, 2010

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94 Michael E. Spreadbury, Pro Se Plaintiff Attorney