

**EXHIBIT C**

1 Pro Per  
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FILED  
DEBBIE HARMON, CLERK

MAY 07 2010

*myself* *laurel*  
DEPUTY

6 MONTANA 21<sup>ST</sup> JUDICIAL DISTRICT COURT  
7 RAVALLI COUNTY

9  
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 )

16  
17 This case is for the intentional infliction of emotional distress.

18 Factual Background

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

- 20 1. Plaintiff Michael Spreadbury is an individual and resides at 700 South 4<sup>th</sup> Street in the  
21 City of Hamilton, County of Ravalli, State of Montana.
- 22 2. Defendants Angela Wetzsteon and George Corn are individuals with business address of  
23 205 Bedford St. Suite C in the City of Hamilton, County of Ravalli, State of Montana.
- 24 3. On or about August 8, 2007 Defendants Wetzsteon and Corn obtained an arrest warrant  
25 from Judge Bailey of Justice Court of Ravalli County for Plaintiff's failure to appear on  
26 TK 2006-3068. Plaintiff appeared through retained attorney for misdemeanor in Justice  
27 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 Fulbright'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

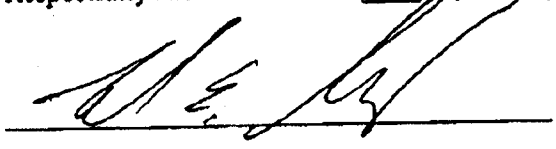
68 10. As a proximate result of the Defendant's actions alleged herein, Plaintiff has had his  
69 capacity to pursue an established course of life destroyed by Defendants. Plaintiff has  
70 suffered permanent damage to lifestyle and professional life as a result of Defendant  
71 activity described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

90  
91 Respectfully submitted on this 7<sup>th</sup> day of May, 2010

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94 Michael E. Spreadbury, Pro Se Plaintiff Attorney