

SUPERIOR COURT BERGEN COUNTY

FILED

JUL 30 2008

ALEXANDER CARMICHAEL, ESQ.
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[Signature]
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JUL 30 2008
SUPERIOR COURT OF BERGEN COUNTY OF NEW JERSEY
FINANCE DIVISION

Date Filed	7-30-08
Payment #	9403
CA CK CC	(MO) CC
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Payor	Carmichael
Batch/Ref/Case #	878

ALEXANDER CARMICHAEL, ESQ. dba :
LEAGUE OF AMERICAN PATRIOTS : SUPERIOR COURT OF NEW JERSEY
Plaintiff : LAW DIVISION: BERGEN COUNTY
vs. : Docket No. **L5825-08**
WILLIAM A. WHITE as publisher :
of the website OVERTHROW.COM. : **Civil Action**
Defendant : **COMPLAINT AND JURY DEMAND**

Plaintiff, ALEXANDER CARMICHAEL, Esq., residing at 35 Prospect Street in the City of Garfield, County of Bergen and State of New Jersey, by way of complaint states that:

- On May 4, 2008, Bill White published the false and defamatory article titled "*The Strom Reorganization*" on his website, Overthrow.com. See attached **Exhibit A**.
- In the above entitled story, White posted the following false and defamatory statements:
 "... *inside story on the New Jersey lawyer and the former Chicago factory owner who have been coughing up the bucks and putting back together Kevin Alfred Strom's pedophile sex network. They also seem to have ties to the assassination attempt on Elisha Strom, and involve a pedophile cartel.*"
- On May 8, 2008, Bill White published the false and defamatory article titled "*Ron Paul Shocked his Entire Campaign Staff Made Up of White Activists*" on his website, Overthrow.com. See attached **Exhibit B**.
- In the above entitled story, White posted the following false and defamatory statement:
 "*In New Jersey, it was Alexander Carmichael, a former National Alliance and National Vanguard member with ties to both child pornography gangs and former National Vanguard leader Kevin Alfred Strom.*"
- On May 14, 2008, Bill White published the false and defamatory article titled "*New*"

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Jersey Lawyer, New York Cultist Seek to Revive Kevin Alfred Strom's Career; League of American Patriots Purges Sexually Normal, Plans Reunion" on his website, Overthrow.com. See attached **Exhibit C**.

6. In the above entitled story, White posted the following false and defamatory statements:
Garfield, New Jersey -- When convicted pedophile Kevin Alfred Strom is released from prison this September, one short, wiry attorney may be standing there with flowers and cake.

Alexander Carmichael, an attorney from Garfield, New Jersey ... has spent the past few months rebuilding Strom's National Vanguard, calling it the League of American Patriots, reuniting its members, holding meetings, planning a Strom "welcome home" party, and purging old National Vanguard leaders who objected to the molestation of children."

7. In the May 14 article, White further posted: "*Carmichael is a Princeton graduate and formerly worked for a firm defending insurance companies against claims. When contacted, his former employer laughed when told he had started a "neo nazi" group and said they were not surprised.*"

8. On May 14, 2008, Bill White also reprinted an article written by plaintiff on his website, Overthrow.com, adding the false and defamatory title: "*Pedophiles To Rally Against Immigration in New Jersey.*" See attached **Exhibit D**.

9. On May 29, 2008, Bill White published the false and defamatory article titled "*Strom Supporters Complain to FBI About Coverage*" on his website, Overthrow.com. See attached **Exhibit F**.

10. In the above entitled story, White posted the following false and defamatory statement:
"Carmichael is the founder of the League of American Patriots, an organization intended to revive convicted child pornographer Kevin Alfred Strom's white nationalist career..."

11. As a direct and proximate result of the defendant's publishing of the above defamatory statements, the plaintiff has suffered irreparable injury to his reputation both as an attorney and a

private citizen in the State of New Jersey.

WHEREFORE, based upon the foregoing the plaintiff, ALEXANDER CARMICHAEL, Esq., demands judgment against the defendant for those sums that would reasonably and properly compensate him for his damages under the laws of the State of New Jersey.

ALEXANDER CARMICHAEL, Esq.
Attorney for Plaintiff



ALEXANDER CARMICHAEL, Esq.

Dated: July 22, 2008

INTERROGATORIES

Plaintiff demands defendant supply full responsive answers to Form C and C(1) Interrogatories pursuant to R. 4:17-1(b)(1).

DESIGNATION OF TRIAL COUNSEL

ALEXANER CARMICHAEL, Esq., is named as the designated trial attorney in this matter pursuant to R. 4:25-4.

JURY DEMAND

Plaintiff demands a trial by jury as to all issues in this matter pursuant to R. 4:35-1(a).

ALEXANDER CARMICHAEL, Esq.
Attorney for Plaintiff



ALEXANDER CARMICHAEL, Esq.

Dated: July 22, 2008

CERTIFICATION

ALEXANDER CARMICHAEL, Esq., pursuant to R. 4:5-1, certifies:

1. I am an attorney of the State of New Jersey and am principally charged with the handling of this matter.
2. This matter is not the subject of any other action pending in any court, or any arbitration proceedings contemplated.
3. To my knowledge, there are no other parties who should be joined in this action at this time.
4. I hereby certify that my foregoing statements are true. I am aware that if any of my statements are willingly false, I am subject to punishment.



ALEXANDER CARMICHAEL, Esq.

Dated: July 22, 2008