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FILED
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CLERK OF THE SUPERIOR COURT
BY *Christina J. Lane* DEPUTY

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8 SUPERIOR COURT OF CALIFORNIA
9 IN AND FOR THE COUNTY OF MERCED

10 In re:)
11 GEORGE G. LOGAN,)
12 Plaintiff,)
13 v.)
14 FRED ROSS, as an individual,)
15 and DOES I-XX,)
16 Defendants.)

Case No.: **CV000745**
COMPLAINT FOR LIBEL and
CONSPIRACY TO LIBEL

\$355

17 FOR A FIRST CAUSE OF ACTION FOR LIBEL against the Defendants and each of them,
18 Plaintiff alleges as follows:

- 19 1. Defendant Fred Ross is and at all times mentioned herein, a resident of Stanislaus
20 County, California.
- 21 2. Plaintiff is ignorant of the names and capacities of the defendants named herein as
22 Does I-XX and therefore sues these defendants by fictitious names. Plaintiff
23 believes and alleges that each of the "fictitious defendants" is responsible in some
24 manner for the occurrences alleged herein and that Plaintiff's damages were
25 proximately caused by their conduct.
- 26 3. All of the defendants were and are the agents of their co-defendants and were at all
27 times acting within the scope of such agency.
- 28 4. Several times during 2009, the Defendants published written materials in the

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Patterson Irrigator, a newspaper, and in the Patterson Irrigator website asserting that Plaintiff was "in the pocket" of Patterson developers; that Plaintiff was a "joke."

5. The assertion "in the pocket of developers" is understood to mean that Plaintiff has been paid off by developers in the City of Patterson to make legal rulings in their favor.
6. The assertion that Plaintiff is a "joke" is understood to mean that Plaintiff is a subject of general ridicule in the community.
7. These assertions are false in that Plaintiff has never received any money or thing of value from any developer in or near the City of Patterson and Plaintiff is an accomplished attorney at law.
8. The publications mentioned above are circulated throughout every county in California, including Merced County. Said assertions were then published in Merced County, California.
9. These assertions were read by people in all counties of California including Stanislaus and Merced Counties.
10. As a proximate result of the above-described publications, plaintiff has suffered loss to his reputation, shame and hurt feelings and all to his general damage.
11. The above publications were made with malice with the specific intent to injure plaintiff's reputation and this plaintiff seeks an award of punitive damages.

FOR A SECOND CAUSE OF ACTION FOR CONSPIRACY TO LIBEL, Plaintiff alleges

as follows:

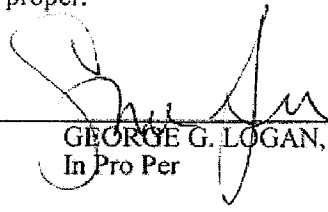
12. Plaintiff incorporates the allegations of paragraphs 1-11 as it set forth herein.
13. During the year 2009, the defendants knowingly and willfully conspired and agreed among themselves to damage plaintiff's reputation.
14. Defendants Doe I-X did the acts alleged herein pursuant to and in furtherance of the conspiracy and alleged agreement.
15. Defendants Does XI-XX furthered the conspiracy by cooperation with or lent aid and encouragement to defendants Doe I-X.

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16. The last overt act in furtherance of the conspiracy occurred in December 2009.
WHEREFORE, Plaintiff prays judgment against the defendants and each of them as follows:

- 1. For General Damages;
- 2. For Exemplary Damages;
- 3. For costs of suit;
- 4. For such other relief as the court deems proper.

Dated: 1-7-10



 GEORGE G. LOGAN, Plaintiff
 In Pro Per

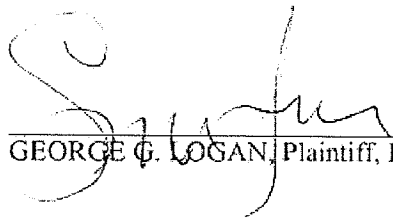
VERIFICATION

I, GEORGE G. LOGAN, declare:

I am the Plaintiff in the above-entitled action. I have read the foregoing Complaint for Libel and Conspiracy to Libel and know the contents thereof, and certify that the same are true of my own knowledge.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: 1-7-10



 GEORGE G. LOGAN, Plaintiff, In Pro Per