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CAUSE NO.

09-02846

FILED
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GARY FITZSIMMONS
DISTRICT CLERK

Yvonne Hampton
DEPUTY

**Corolone Inc. Barack Obama
Osama bin Laden , Buddy Busch**

Plaintiffs

v.

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§

IN THE DISTRICT COURT OF

L-193rd

DALLAS COUNTY, TEXAS

**Mahmound Ahmadinejad ,Hugo Chavez
Rod Blagojevich , Donald Trump
James Goodnight
Defendants**

~~168th~~ JUDICIAL DISTRICT

Plaintiffs' Original Petition

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiffs : **Corolone Inc.** et al (collectively, "Plaintiff's) files this Original Petition complaining of Defendants James Goodnight et al (collectively "Defendants")and for causes of action would respectfully show.

I.DISCOVERY CONTROL PLAN

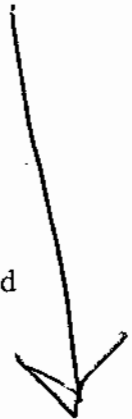
1. Plaintiff intends to conduct discovery under Level 2 of Texas Rules of Civil Procedure 190

II. PARTIES

2. This is a suit for libel, libel per se,business disparagement ,tortious interference with contractual relationships ,tortious interferences with prospective relations bad faith, deceptive insurances practices ,fraud, civil conspiracy ,Violation of Texas Harmful Access by Computer. Brought by plaintiff's against defendants in response to their malicious attacks upon plaintiff's , that falsely impeach plaintiff's respective ,honesty, integrity ,virtue, and even reputation and even accuse plaintiff's of criminal activity(i.e., child molestation embezzlement and prostitution)as shown below defendants should be held accountable for these wholly unwarranted and unsubstantiated attacks.

3. Plaintiff: **Corolone Inc . 5335 Ridgecrest Jacksonville Florida 32207.**
4. Plaintiff: Buddy Busch who resides at 3716 Woodshadow Lane Addison Texas 75001
5. Plaintiff: Barack Obama who resides at 1600 Pennsylvania Ave NW Washington, DC 20500
6. **Osama bin Laden who resides at 5335 Ridgecrest Jacksonville Florida 32207**
7. Defendant: Rod Blagojevich Office of the Governor
207 State House
Springfield, IL 62706
8. Defendant : Hugo Chavez UN Headquarters
First Avenue at 46th Street
New York, NY 10017
9. Defendant : Mahmoud Ahmadinejad UN Headquarters
First Avenue at 46th Street
New York, NY 10017
10. Defendant: Jim Goodnight is the CEO of SAS Institute Inc. who may be served with process at 100 SAS Campus Drive ,Cary North Carolina 27513
11. Defendant: Donald Trump The Trump Organization
725 Fifth Avenue
New York, NY 10022

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III. JURISDICTION AND VENUE

12. This Court has jurisdiction over the defendants in this lawsuit .Venue is proper in Dallas County ,Texas based on all or a substantial part of the events giving rise to the claims occurred in this county. Tex.Civ.Prac.&Rem . Code.15.002(a)(1)-(2). Further, Venue is mandatory in Dallas County, Texas because this is a suit for damages arising from libel and defendants residences in Dallas County at the time the causes of action stated accrued. Tex. Civ. Prac. & Rem.Code 15.

IV. FACTS

1. Defendants have & continue together as a member and to combine together with the object of the combination to accomplish an unlawful purpose.
2. Shortly after the Termination of SAS Institute Inc employee's from the ("Education Group")("Manufacturing Group") ("Retail Group")in 2008 which consists of 800 SAS employees' who were terminated with no notice before a holiday by SAS Institute Inc CEO Dr. Goodnight, winner of award for Top 100 places to Work for Working Mothers featured in ("Working

Mothers Magazine, Oprah ,60 minutes”) who personally has fired in 2008 (700 working mothers with children).

3. Forbes Top 100 wealthiest \$ Billionaires. The Largest Private Software Company CEO paid \$1Billion Dollars for 5 Star Umstead Hotel to wife Ann for his Adultery with High school (Working Mother) teacher. Goodnight alleges that education is really important. (“Goodnight fired entire Education Group before holiday with no warning”!)
4. Defendants began an internet smear campaign against Plaintiffs which campaign has used vilifying, despicable, & opprobrious epithets of sexual, racial and criminal nature. Defendants have also published and continue to publish statements of facts about Plaintiffs on SAS website and you tube website that are publicly available thru the internet that are grossly false and defamatory and constitute libel & constitute libel per se because they were reasonably calculated to injure Plaintiffs reputation they have exposed Plaintiffs to public hatred, contempt ridicule and financial injury.
5. These statements are reasonably calculated to impeach Plaintiffs respective honesty, integrity, virtue, and reputation. Defendants have published statements about Plaintiffs economic interests through SAS website & you tube website that are disparaging these statements are widely & publicly available through the internet. These statements are grossly false and create a defamatory impression.
6. Defendants have acted with malice when they made statements with knowledge of their falsity with reckless disregard for the truth and intended them to interfere with Plaintiffs economic interests and without privilege. Defendants have & continue together having meetings of the minds on these objects and courses of their actions all members committed an unlawful overt act and continue to further their object and courses of action causing Plaintiffs to suffer injury as a proximate result of the wrongful act by Defendants.
7. SAS Institute Inc CEO Dr. James Goodnight & Defendants access the private internal files of **Corolone Inc. & White House Executive Files** by a computer, computer network or computer system without its effective consent .

8. Defendants obtained information about a Whistleblower who discovered SAS Institute Inc & CEO Dr. James Goodnight Plans to defraud SAS Customers & Business around the World.

9. Defendants thru these files also retrieved the cell phone of Executive White House personal. This unauthorized use was committed knowingly and intentionally defendants then intentionally disclosed Private Cell Phone number to defendants that the information was obtained through an illegal interception Defendants accepted the number and contacted White House personal and Cabniet for the sole purpose to intimidate , deceive, and threaten Executive Branch to further the acts of the other defendants.

Defendants supplied FBI files Defendants supplied with plaintiffs private information where this information has been published identifying plaintiffs by name and address & pictures taken without their authorization.

10. SAS Institute Inc also found out about a Business relationship with ("Pat Robertson") & ("CBN the 700 Club") who had a Business relationship with ("Corolone Companies Inc.")

11. SAS Institute Inc than terminated ("Corolone Companies Inc.") & ("from their employment with SAS .

12. (Corolone Companies, Inc.) Have suffered injury in their Business Contractual relationships, prospective relations. Through being wrongfully terminated by CEO Dr. James Goodnight, and the malicious attacks by Goodnight , & Defendants that have falsely attacked and impeach Plaintiff's respective honesty, integrity, virtue, and reputation and even accuse them of criminal activity(i.e., child molestation ,embezzlement ,and prostitution.) These smear campaigns against Plaintiff's have used vilifying ,despicable and opprobrious epithets of a sexual racial and criminal nature .

13. (Corolone Companies, Inc.) & White House Executive Branch Teamed up with SAS Inst Inc. and CEO Goodnight. Along with Defendants which is a "Green" program.

14. Defendants who conceal from and failed to disclose certain facts to Version Corp, Cisco Corp, Ford ,AT&T ,Wal-Mart , and SAS customers along with (**Corolone Companies, Inc.**) Information and facts that they had a duty to disclose to Version Corp, Ford Corp, AT&T ,Wal-Mart ,Cisco Corp & SAS Customers along with **Corolone Companies, Inc. WhiteHouse Executive Branch.**
15. **They failed to do so when they hired Corolone Companies Inc & White House Executive Branch to promote Green Program.** Corolone Companies Inc works with 39 countries around the world and with the Largest Religious Non Profit Corps in the world and promoted the New Green Program for SAS Inst Inc Jim Goodnight & Defendants .These failures and fraud have caused Corolone Companies Inc injury,& White House .
16. CEO Dr. James Goodnight had a meeting of the minds with Project Manager Bob Green of SAS Institute Inc to create for all a Green Program. SAS Institute Inc & Defendants joined together as a member and to combine together with the object of the combination to accomplish an unlawful purpose of fraud and civil conspiracy with the Green Program and Green Software Corporate sustainability when the defendants knew that the representations were false they made & the representations were recklessly stated as a positive assertion without knowledge of its truth to Corolone Companies Inc. & White House.
17. Defendants made the representations with the intent that **Corolone-Companies, Inc. act on it. The Plaintiffs Corolone Companies, Inc. relied on the representations and the representations caused Corolone Companies, Inc.& White House** to suffer injury as a proximate result of the wrongful act by Goodnight & Defendants.
18. SAS Institute Inc Goodnight & Defenadts on March 2007 in Dallas Texas acted intentionally when they made contact by violently attacked Plaintiffs

Defendants knew and believed that this contact would be offensive, insulting and caused Physical Pain and Mental anguish in the past and future, medical expenses in the past and future, physical impairment and lost wages, and exemplary damages.
19. Defendants acted intentionally when they made contact while placing his hands on the bottom & breast Michelle Obama while at a conference and hotel lounge in August 2007 in Chicago IL. Goodnight also in Dallas Texas on March 2008 in a conference placed his hands on Obama inner thigh and on her bottom while sitting next to her in the conference. Goodnight knew

and believed that this contact would be offensive, insulting and cause Plaintiffs to suffer Physical Pain and Mental anguish in the past and future, medical expenses in the past and future physical impairment and lost wages, and exemplary damages.

20. Defendants then intentionally and knowingly threatened the lives of Plaintiffs with imminent bodily injury. August 20, 2008 stating that all of you will be killed the next day. August 21, 2008 **Anheuser-Buschs Companies, Inc CEO Alex Busch was found dead! This has caused Buddy Busch Physical Pain and Mental anguish in the past and future, medical expenses in the past and future physical impairment and lost wages, and exemplary damages.**
21. Defendants July 2008 also threatened plaintiffs hiring a professional killer to come to Buddy Busch's home in Addison Texas to kill him. July 18-20, 2008. Professional killer came to the house of Busch where he threatened to kill Family and claimed he was hired by SAS Institute Inc CEO . This has caused Busch Physical Pain and Mental anguish in the past and future, medical expenses in the past and future physical impairment and lost wages, and exemplary damages.
22. March 2007 Dallas Texas defendants threatened Plaintiffs that White House would burned to the ground in November 14, 2007& along with Buddy Busch House November 14, 2007 Lexus Gs 300 erupted into flames in Addison Texas Home of Busch & White house diverted attack by defendants .Defendants attacks as promised caused Physical Pain and Mental anguish in the past and future, medical expenses in the past and future physical impairment and lost wages, and exemplary damages, and damages to plaintiffs.
23. Defendants 3 different times threatened the life of plaintiffs wives .Obama wife told Barack about Goodnight improper physical conduct against her. Goodnight was very drunk offensive and insulted Obama This has caused Plaintiffs Physical Pain and Mental anguish in the past and future, medical expenses in the past and future physical impairment and lost wages, and exemplary damages
24. Lynn Creesy laughed when (60 Minutes & Oprah & Working Mothers Magazine) claim SAS is Top 100 best places to work for Working Mothers! Busch was informed by Creesy that if you think Dr. Goodnight means any of that ("Crap") then you must be as stupid as ("Trash") that watch ("Oprah & 60 Minutes & the 2 people who read "Working Mothers Worthless Magazine"). Creesy claimed Goodnight could care less about his wife ("Ann") he is a coldhearted ruthless tyrant that SAS Institute Inc employees fear.
25. These are the facts of the Defendants actions as stated below by Plaintiffs

26. Busch First encountered ("Barack Obama") in the South side of Chicago Il around 1987. Busch encountered Obama when he was gathering information for the FBI relating to the Columbia Drug Cartel, who was supplying 3 major states New York, Chicago , Florida with Cocaine, hand grenades, automatic weapons to Mafia leaders and South Side Projects Gang Leaders .
27. Obama who actually introduced me to his Pastor where I visted for the sole purpose to gather information for the FBI, wanted me to join his church not knowing that I was only there to gather information for the FBI. Obama explained that Rev.Wright views were very disturbing and very racist and never shared his beliefs of how America was a Racist nation and never had any desire to destroy the white culture and develop a black America and would never accept Muslim values that distorted the nation of Islam & Minister Louis Farrakhan which he never accepted as being right.
28. Defendants joined together as a member and combined together with the object of the combination to accomplish an unlawful purpose the Defendants had a meeting of the minds on the object and course of action all the members committed an unlawful overt act to further the object and course of action
29. James Goodnight had a meeting of the minds between Defendants with the information they obtained thru access and began an internet smear campaign against Obama White House etc & Corolone Inc. Which campaign used vilifying, despicable and opprobrious, epithets of a sexual, racial, and criminal nature.
30. Defendants began their internet tirade on two fronts. First in 2008 Plaintiffs became aware of a internet website <http://www.sas.com> (hereinafter the "SAS Website"), that maligned Plaintiffs James Goodnight, and Defendants . In 2008 version of this website Defendants makes the following statements that are libelous per se.

That Corolone Inc along with Obama employs "trained child molester"[sic] at its on site childcare facilities.

That mothers that work at Corolone Inc& Obama election team neglect and abuse their children .

That Obama corporate culture “was featured as the Best Place to work on the Oprah show for Niggers and spicks for minimum wage” [sic] .

Defendants have added new defamatory and disparaging content on a daily basis and have failed to remove the objectionable content from the SAS website. For example, in addition to the statements listed above, the SAS website now contains through the posting by defendants (1) numerous video clips of fistfights between admitted racists and others (2) copyright photos of plaintiffs taken without the authorization from private files, identifying Plaintiffs by name and containing vulgar comments underneath (3) video clips of the World Trade Center attacks with statements that Plaintiffs funded and otherwise supported the 9/11 attacks. (4) a statement that if this website is shut down, they will “just get a new one over and over and over till the end of time and never stop”[sic](5) the threat read “the title of his Book as/hole Checkmate in three moves you stupid worthless fuc/ing piece of shi/ “[sic](6) a statement that Obama is being indicted for fraud and (7)fifteen (15) video clips of assassinations /would be assassinations of President George W. Bush, former President Regan, Ford, and Kennedy, Prince Charles, and Inejiro Asanuma 2

31. Defendants joined together on a second front as Plaintiffs also discovered for the first time on 2008, was a barrage of no less than ten (5) videos posted on the popular website, You Tube .com. While 5 videos themselves did contain content specifically relating to Plaintiffs the other 5 videos did the titles and captions also made statements of facts of plaintiffs (1) threatened to kill others(2)embezzled billions from Business (3)is a child molester(4)defrauded Business customers (5)supported terrorism
32. Additionally, most of the captions to the videos contain Plaintiffs and Tamara Busch’s business address, telephone number and personal information.
33. The above You Tube videos and SAS website constitute a calculated and consistent barrage to destroy the business and reputation of plaintiffs as well as to ruin Plaintiff’s in their respective, office, business, professions and occupations. Defendants actions taken in context, also amount to perceived threats of physical violence intimidation and coercion. Further, all of the complained conduct is not only false and actionable, but amount to abuses of speech that is invasive of the rights of Plaintiff’s and for which no privilege or right protects.

CAUSES OF ACTION

COUNT ONE –LIBEL AND LIBEL PER SE

34. Plaintiffs re-allege and incorporate by reference paragraph 1-32 inclusive as if fully set forth herein.
35. Upon information and belief , Defendants has published statements of fact about plaintiffs , referring specifically to website (<http://www.sas.com>) (SAS Website) and through postings on the [www.You Tube .com](http://www.YouTube.com) website. These statements are widely publicly available through the internet.
36. These statements on the SAS Website <http://www.sas.com> posted by Defendants and posting on the [www.You Tube .com](http://www.YouTube.com) website were grossly false and defamatory and constitute libel.
37. These statements on the SAS website by Defendants and postings on the [www.You Tube web site](http://www.YouTube.com) by defendants constitute libel per se because they were reasonably calculated to injure Plaintiffs reputation. The statements expose Plaintiffs to public hatred, contempt, ridicule, and financial injury.
38. The Statements are also libel per se because they were reasonably calculated to impeach Plaintiffs, respective honesty, integrity, virtue, or reputation.
39. The statements are also libel per se because they injure Plaintiffs in his office business, profession, and occupation, and falsely impute the commission of crimes.
40. Defendants acted with actual malice when the statements were made .Upon information and belief, published the statements with knowledge of their falsity or with reckless disregard for the truth.
41. Defendant also acted with negligence when the statements were made they knew or should have known that the statements were false .Upon information and belief, they failed to determine the truth of the statements before publishing them.
42. By reason of the foregoing, Plaintiffs are entitled to damages, including but not limited to exemplary damages as Defendants have made statements that constitute libel per se.

COUNT TWO –BUSINESS DISPARAGEMENT

43. Plaintiffs re-allege and incorporate by reference paragraph 1-32 inclusive, as if fully set forth herein.
44. Upon information and belief, Defendants, has published disparaging statements about Plaintiffs economic interest through www.sas.com and www/You Tube .com .These statements are widely and publicly available through the internet.
45. The statements are grossly false, and create a defamatory impression.
46. Defendants , were acting with malice when statements were made .Upon information and belief, Defendants published the statements with knowledge of their falsity or with reckless disregard for the truth and intended by them to interfere with plaintiffs economic interests and are without privilege.
47. By reason of the foregoing, Plaintiffs are entitled, including but not limited to exemplary damages because Defendants have made statements that disparage plaintiffs economic interest.

COUNT THREE –TORTIOUS INTERFERENCE WITH CONTRACTUAL RELATIONSHIPS

48. Plaintiff re-allege and incorporate by reference paragraphs 1-32 inclusive ,as if fully set forth herein
49. Plaintiffs has contractual relationships with third party customers ,as well as with current employees.
50. Defendants, has and continues to interfere with such contracts of plaintiffs with an improper motive or means.
51. The result of Defendants, intentional and tortuous interferences with Plaintiffs contracts with third parties and employees has resulted in injury to plaintiffs . Further, plaintiffs will continue to suffer losses and irreparable injury to its business relations with third parties.
52. By reason of the foregoing, Plaintiffs is entitled to and, including but not limited to exemplary damages against Defendants.

COUNT FOUR – TORTIOUS INTERFERENCE WITH PROSPECTIVE RELATIONS

53. Plaintiffs re-allege and incorporate by reference paragraphs 1-32 inclusive, as if set forth herein.

64. By reason of the foregoing Plaintiffs are entitled to Physical Pain and Mental anguish in the past and future, medical expenses in the past and future physical impairment and lost wages, and exemplary damages.

Count nine Civil Conspiracy fraud by nondisclosure

Plaintiffs re-allege and incorporate by reference paragraph 1-32 inclusive as if fully set forth herein.

65. Upon information and belief Defendants was a member of a combination of two or more person the object of the combination to accomplish an unlawful purpose by unlawful means the Defendants who had a meeting of the minds on the object and course of action all the members committed an unlawful overt act to further the object and course of action. The plaintiffs suffered injury as a proximate result of the wrongful acts.
66. The Defendants concealed from and failed to disclose certain facts to the plaintiffs, the defendants had a duty to disclose the facts to plaintiffs the facts were material the defendants knew that plaintiffs was ignorant of facts and the plaintiffs did not have an equal opportunity to discover the facts about when they committed fraud the defendants were deliberately silent when they had a duty to speak by failing to disclose the facts the defendants intended to induce the plaintiffs to take some action the plaintiffs relied on the defendants nondisclosure and the plaintiffs were injured as a result of acting without the knowledge of the undisclosed facts.
67. By reason of the foregoing plaintiffs are entitled to damages, including but not limited to exemplary damages, loss wages, Physical Pain and Mental anguish in the past and future, medical expenses in the past and future physical impairment and special damages .

DAMAGES AND ATTORNEY FEES

Plaintiff re-allege and incorporate by reference paragraph 1-32 inclusive as if fully set forth herein As a result of Plaintiffs has been damaged in an amount in excess of the jurisdictional limits of the Court. Plaintiffs seeks all actual damages available resulting from or proximately caused by each of the legal wrongs described here

Additionally, as a result of Defendant's actions, Plaintiffs has engaged the attorney and agreed to pay their reasonable attorney fees and expenses incurred in prosecuting this suit and defending himself in suit filed against him to protect their rights. Plaintiff is entitled to an award of reasonable attorney fees and expenses.

VII. EXEMPLARY DAMAGES

68. Plaintiff re-allege and incorporate by reference paragraphs 1 through 32 inclusive, as if fully set forth herein.
69. Plaintiff's damages resulted from Defendants malice which entitles Plaintiff to exemplary damages. TEX. CIV. PRAC. & REM. CODE 41.003(a)

X. PRAYER

WHEREFORE, Plaintiff respectfully requests the following relief:

- (1) That Defendant be cited to appear and answer herein;
- (2) Trial by jury, which is hereby demanded;
- (3) An award of actual damages in an amount within the jurisdictional limits of this Court;
- (4) An award of exemplary damages within the jurisdictional limits of this Court;
- (5) Costs of court, prejudgment interest, post judgment interest, attorney's fees, and a contingent award of attorney's fees in the event of any appeal or appeals;
- (6) Such other and further relief, general or special legal or equitable to which plaintiffs may be justly entitled.

Certificate of Service

As required by Texas Rule

certify that I have served a copy of the foregoing motion upon all parties of interest this day of 3/5/2009/

5. Plaintiff: Barack Obama who resides at 1600 Pennsylvania Ave NW
Washington, DC 20500

Buddy Busch who resides at 3716 Woodshadow Lane Addison Texas
75001


Tom Hagen family lawyer and consigliere advisor

Vito Andolini family lawyer and consigliere (advisor)

Immobiliare Istituto per le Opere di Religione

Corolone Inc. International

Corolone Inc. 5335 Ridgecrest Jacksonville Florida 32207.


Tom Hagen 3/10/08
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