

UNITED STATES DISTRICT COURT

For the

District of North Dakota

Angela Hansen

Plaintiff/ Injured Party

v.

Shannon R. Dieterle,

Ben C. Pulkrabek

Law Office of Ben. C. Pulkrabek,

Rodney I. Pagel,

Pagel Weikum Law Offices,

Donald Jorgensen/ Estate of,

David E. Reich,

Gail Hagerty,

Gerald VandeWalle,

Dale Sandstrom,

Carol Ronning-Kapsner,

Lisa Fair-McEvers,

Daniel Crothers,

Richard Geiger,

Penny Miller,

Kathy Mindt,

Sylvia Schell,

Petra Hulm,

Lorraine Myers,

Sally Holewa,

Donna Wonderlich,

Richard Riha,

Wayne Stenhejem,

Ladd Erickson,

Trent Naser,

Delbert Hoffman,

Matt Lisic,

Daniel Reich,

Jerauld County John Doe's

Jerauld County Jane Doe's,

Defendants.

Civil Action No. 1:17-cv-055

AMENDED COMPLAINT FOR:

1. Violations of Racketeer Influenced and Corrupt Organizations Act 18 U.S.C. 1962(c)
2. Violations of Racketeer Influenced and Corrupt Organizations Act 18 U.S.C. 1962(d)
3. Violations of 18 U.S.C. 1951
4. Fraud
5. Kidnapping
6. Trespass to Chattels
7. Unjust Enrichment
8. Civil Conspiracy
9. Violations of 42 U.S.C. 1981
10. Violations of 42 U.S.C. 1982
11. Violations of 42 U.S.C. 1983
12. Violations of 42 U.S.C. 1985
13. Breach of Fiduciary Duties
14. Aiding and Abetting
15. Violations of the Hobbs Act

DEMAND FOR TRIAL BY JURY

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## **INTRODUCTION**

1. This action arises from six (6) years of illegal activity beginning August 2011 to this very moment, by stated Defendants in this Amended Complaint. Defendant Dieterle and his co-defendants and co-conspirators have sought to extort, defraud, and otherwise tortuously injure plaintiff Hansen by means of a plan they conceived and executed to completion in North Dakota. It has been carried out by and through a North Dakota based enterprise comprised of, among others, North Dakota Plaintiff Dieterle, attorney for Dieterle, Ben Pulkrabek at onset and then replaced by attorney Pagel. Co-conspirators Jorgensen and Reich, these Conspirators are collectively referred to herein as the “RICO Defendants.” Their co-conspirators in the enterprise include Gail Hagerty, VandeWalle, Sandstrom, Crothers, Fair-McEvers, Ronning-Kapsner, Mindt, Miller, Schell, Holewa, Geiger, Myers, Hulm, Riha, Stenehjem, and Erickson. Dieterle and Pagel went so far as to enlist the aid of the Sheridan County Sheriff’s Department, Sheriff Trent Naser, Deputy Daniel Reich, Delbert Hoffman and Matt Lisic, as well as the McHenry County Sheriff’s department and Jerauld County Sheriff’s Department in South Dakota and several unknown Jane and John Doe’s of this entity, all of which acted in their individual capacities to deprive Hansen of her rights and commit acts to aid and abet the conspiracy of Dieterle, Pagel and Reich.

2. The conduct of Defendants harkens back to the days of unrepentant racketeering by organized crime, which makes some sense here. The North Dakota District Court and Supreme Court Judges conduct their business and affairs with the same disregard for others’ rights as the mob. The enterprise’s ultimate aim has been to create through pressure on Hansen to extort from her, and cause her to pay up and lose all of her assets, her home, her business, and most importantly in the intentional premeditated kidnapping and concealment of her youngest



daughter in this campaign against her. The RICO Defendants have sought to inflict maximum damage to Hansen and her reputation, to put personal psychological pressure on her, place her under moral duress and to disrupt Hansen's relationship with her daughter, to separate her by force from her home and business, her child and to provoke North Dakota Courts and officials and thereby force her into losing everything tangible, leaving her broke and penniless, homeless and without her youngest child all of this brought on by the malicious, fraudulent deceit, retaliation and collusion of the RICO Defendants.

3. To effect this plan, the RICO Defendant Dieterle along with Pulkrabek and then Pagel, acting as an attorney in the course of a judicial proceeding, along with the aid of their co-conspirators initiated a sham litigation in the North Dakota South Central Judicial District Court in a civil matter by using fraudulent methods of deceit in an attempt to claim custody of the baby, and possession of the home ranch and Hansen's business. Dieterle concealed financial assets, marital property as well as other marital assets, however, most assets belonged to Hansen, and/ or were joint marital property obtained during marriage. The members of the enterprise operated together in a coordinated manner in furtherance of a common purpose, a coordination of activities, objectives, interlocking nature of the schemes and overlapping nature of the wrongful conduct.

4. In prosecuting the case of the Dieterle litigation, the RICO Defendants and their co-conspirators have engaged in a series of corrupt acts. For example, Dieterle and Pagel have submitted in the Dieterle litigation fabricated evidence, a plethora of knowingly and intentional fraudulent unsubstantiated inadmissible statements of hearsay, failed to provide any evidence in bringing motions, intentional willful concealment of Hansen's evidence, conspired in the concealment of affidavits of Hansen and affidavits of Hansen's witnesses, including expert

reports and witness tampering along with intentional conspiracy to obstruct justice. Including acts of perjury to commence and continue their conspiracy against Hansen. Dieterle with the aid of Pagel, intentionally and knowingly concealed material evidence including affidavits and expert reports to manipulate the court against Hansen in a continued pattern of racketeering. The initial decree was based entirely upon deceit, fraud, submission of unsubstantiated inadmissible fraudulent allegations by Dieterle and Pagel. Jorgensen abandoned his fiduciary and judicial duties and became embroiled in this matter.

5. Pagel also pressured his co-conspirators into generating inflated false damages for fraudulent sanctions against Hansen to extort hundreds of thousands of dollars both in loss and in actual fees. The acts committed by Dieterle, Pagel and Reich included obvious witness tampering on more than one occasion. There is sufficient evidence to show a state of affairs which trial judges should not permit and may be pointed to as an example of what they should not do in the trial of lawsuits.

6. In the initial decree, there are no less than 40 utterances by South Central Judicial District judge Jorgensen, which are discourteous, disparaging and based purely on utterances of an attorney and his client, yet, are unsubstantiated and are in fact inadmissible hearsay. There is no retraction sufficient to undo the harm of these utterances. Jorgensen clearly indicates an animus inconsistent with judicial objectivity which was later carried out throughout the course of proceedings by Reich, orders and any hearings that were held restated these utterances. Jorgensen and Reich clearly, openly displayed an animus toward Hansen inconsistent with judicial objectivity.

7. The embroilment of Pagel, Jorgensen and Reich in matters was palpable; Reich permitted himself to become personally embroiled following Jorgensen's embroilment with Dieterle and Pagel. For one reason or another, both Jorgensen and Reich failed to impose their moral authority upon the proceedings. The behavior first of Jorgensen and later of Reich precluded that atmosphere of authority which should especially dominate a civil trial and which is indispensable for an appropriate sense of responsibility on the part of the court, counsel or parties. During the course of litigation, Jorgensen and Reich improperly thrust themselves into the middle of case settlement negotiations and therefore abandoned their roles as neutral arbitrator. At any given time they seemed to fill the role of judge, jury, defense counsel, prosecutor, psychiatrist, social worker, officer and Dieterle's personal advocate.

8. These North Dakota RICO Defendants together with their co-conspirators set about fraudulently exploiting Hansen and her reputation through their false statements and concealment in discovery and in evidence. All of which also caused harm to Hansen's business, the extorted money time and again, property, assets and most importantly to remove her from the life of her youngest daughter due to their unlawful schemes and intentional concealment of a minor. Dieterle, Pagel, Jorgensen, Reich and the North Dakota South Central Judicial district and North Dakota Supreme Court acted as an association-in-fact enterprise with Hansen being the victim of corrupt office holders' pattern of racketeering activity.

9. Again and again Dieterle and Pagel manipulated the court to their favor and each time this trio of RICO defendants violated Hansen's rights and committed acts of intentional conspiracy against her. Reich continued gross violations against Hansen to aid Dieterle and Pagel in their scheme. Making unjust, unwarranted deprivations of Hansen's parenting time and all was done without a hearing, without allowing Hansen the right to defend or the right to provide witnesses in her defense, thus, further

depriving Hansen of her rights. Hansen spoke out about his bias and he in fact lessened the parenting time as a mechanism of retaliation and to punish Hansen for seeking to recuse him from the case. If there ever was a dirty judge who was in the pocket of an attorney in a judicial proceeding, it is Reich.

10. Throughout the course of litigation Pagel continually acted as a witness, bullied the other attorneys and ran the court, and Reich allowed this. He would intentionally manipulate the amount of time for the hearing and then run out the clock, knowingly and intentionally, willfully depriving Hansen of her right to a proper defense and to due process. Jorgensen and later Reich knowingly allowed this behavior time and again and did nothing to correct this, nor the continued personal disparaging remarks of Pagel towards Hansen. The intentional conspiracy of fraud and deceit against Hansen and against the Court is monumental.

11. Dieterle and Pagel continued to bring fraudulent, baseless litigation based upon their lies against Hansen. And each time, the trial court judge, Reich, Reich unjustly retaliated and punished Hansen. Hansen was deprived of her right to defend against these false allegations, her right to provide testimony, witnesses and evidence in her defense. Trial court judge, Reich, would use scathing, discourteous and disparaging responses against Hansen, continuing to severely discolored the record with his personal opinion and bias against Hansen. The record, void of any evidence to support the motions brought against her and each time Dieterle and Pagel failed to produce evidence that he stated his orders were based upon, however, the judgments were granted regardless of any material evidence and without a hearing.

12. For example, the transcripts clearly prove that Reich formed an opinion against Hansen before she was permitted to give a defense. Once again, as each time prior, Reich deprived Hansen of her rights. Reich directly expressed his personal opinions of Hansen. Deciding that she was guilty, by his own opinion and not due to any facts presented, did not allow her a

defense and stated his personal opinion against her. In one particular instance the blatant trickery used by Reich is proven by his intentional false misstatements against Hansen. Again, and again, giving a directed verdict for opposing counsel during closing arguments. Reich in fact telling the opposing side how to bring forth additional motions and sanctions for motions against Hansen. Reich, committed intentional judicial misconduct in proceedings against Hansen by not allowing Hansen the right to retain counsel and forcing and coercing her through this hearing without allowing her a proper defense of the allegations poised against her, refused to allow her to present witnesses in her defense, and refused to behave impartially.

13. Hansen had expert reports, sworn affidavits by competent people and evidence in her favor filed on the record and she provided honest affidavits and this evidence was intentionally concealed from the hearings. Reich refused to acknowledge the record and would only grant Pagel the right to present documents or evidence, even if altered. Hansen filed a motion for judicial notice, to intentionally point out this evidence that she filed on the record, and Reich intentionally and knowingly denied this motion. Reich would not listen to a single thing, nor consider anything that was in Hansen's favor. His mind was made up about her and he refused to behave according to his judiciary duties where Hansen was concerned. Pagel knew of these wrongs by a fellow officer of the court, and instead of abiding by his sworn oath as an attorney and adhering to the Code of Ethics, and the ABA Model for Professional Conduct, he took full advantage of the fact that Reich clearly was in his pocket. This all led to grave violations of their fiduciary duties, breach of contract on each of their parts. These defendants and co-conspirators have engaged in a series of corrupt acts.

14. Judge Reich routinely exerted significant and inappropriate pressure on Hansen to accept the malicious offer by Dieterle and Pagel, in extreme violations and deprivations of her rights.

This happened again and again, wherein personal statements were made in judgments and in hearings held for Dieterle. Reich clearly was in favor of Dieterle/ Pagel, continued to work with them and deprive Hansen her right to the court and of equal access to the court and equal access to an un-biased tribunal. In fact, Hansen provided a complaint by a witness to a hearing and that has been submitted in this case as **Exhibit F**. In fact, Hansen sought to remedy the acts of fraud, collusion and deceit in the North Dakota South Central Judicial District Court by bringing forth lawful honest motions to recuse Reich for his obvious bias, impropriety and judicial misconduct against Hansen. His impropriety, bias, hostility, candor, overall tenor and tone spoke volumes of his disdain for Hansen. Yet, he denied Hansen's motions and refused to grant the necessary hearing.

15. Throughout the six (6) years this trio of conspirators worked in collusion to cause extreme harm and abuses against Hansen. Causing serious detrimental deprivations of Hansen's rights, this trio has committed multiple acts of conspiracy to extort money and property and numerous violations of her rights. Conspiracy to commit mail and wire fraud, conspiracy of kidnapping a minor child and to wrongly conceal this child from Hansen, birth mother, who has not given up her maternal rights. Dieterle and Pagel worked in obvious collusion to deprive Hansen unjustly and without cause, the right to be a parent to her youngest daughter. Pagel is clearly an uncouth Fathers Rights Activist, and his intent is to force a child from the mother for personal financial gain. Dieterle and Pagel drafted their ongoing intentional harmful comments against Hansen to continue their collective manipulation of the Court.

16. The consent of property under Hobbs Act... is not limited to physical or tangible property or things, but includes, in a broad sense, any valuable right considered as a source or element of

wealth... “The property extorted must therefore be transferable – that is, capable of passing from one person to another.”

17. Hansen brought forth a motion and affidavit for change/ disqualification of judge due to the appearance of impropriety, which was denied by trial court judge, Reich. Dieterle and Pagel brought forth a motion for contempt against Hansen, which Reich granted. Each motion for contempt was brought by Dieterle and Pagel to punish Hansen for trying to defend herself. Hansen brought forth honest motions to vacate the fraudulently sought motions by Dieterle and Pagel and the subsequent fraudulent and unenforceable orders. Hansen’s motions were supported by honest affidavits exposing the fraud and deceit and made offers of evidence in dispute of the statements made by Dieterle and Pagel who was an attorney in a judicial proceeding. These malicious statements were intentional to manipulate the court against Hansen and were even unsubstantiated. Hansen’s motions were to defend against the lies stated against her and to vacate the fraudulent unenforceable judgments brought on by the deceit of Dieterle and Pagel. Trial court judge, Reich, abandoned his judicial duty and continued to intentionally block Hansen from a fair tribunal and failed to grant a hearing to Hansen. Hansen was forced to bring motions to vacate, motions to recuse and motions for change of venue in front of Reich, in an attempt for justice. Each time Dieterle and Pagel worked in concert to conceal Hansen’s exposure of the fraud and active conspiracy and in fact would retaliate against her, each time demanding to extort even more money from her.

18. Each time, her motions to vacate and expose the fraud being committed were flatly ignored, willfully obstructed or just plain denied without proper consideration and without the requested and required hearing. It was painfully clear Hansen would never get a fair chance in the district court, as Reich entered into the conspiracy against Hansen from onset. There are

easily over a dozen (12) documents, including motions and affidavits to support these motions brought by Hansen to the District Court to expose the fraud and overturn the void judgments, however, time and again Reich abused his discretion and even openly retaliated against Hansen for bringing forth her motions and in fact openly punished Hansen for doing so. While keeping her unjustly barred from the court, he granted the motions of opposing side summarily in retaliation against Hansen, further depriving her of her rights, aiding in the collusion of extortion of money, property and even her youngest daughter from her in his unenforceable orders.

19. During a hearing trial court judge, Reich, stated he was not going to hear each of Hansen's motions, instead he intentionally selected what he would and wouldn't hear, and he refused to allow Hansen a hearing to present witnesses and evidence in her favor and defense. Due to the fraud and deceit, Hansen appealed to the North Dakota Supreme Court on two (2) occasions, in spite of the record being filed with fraud and deceit by Dieterle and Pagel, which Hansen stated to the Supreme Court judges, still the Supreme Court judges failed to uphold the judicial integrity and failed to provide for the required protection of Hansen's rights from the intentional corruption being committed upon her by Dieterle, Pagel and Reich. Fraud upon the court is a manifest abuse of discretion and is a grave miscarriage of justice. In the second appeal to the North Dakota Supreme Court, Hansen stated that much of her evidence was intentionally concealed by the opposing side, and that Reich continued to deprive her right to submit evidence on the record as well as witnesses for her defense; this appeared to be of no concern to them.

20. Time and again, Dieterle and Pagel made numerous attempts of intentional concealment of the child; numerous times they sought to extort money from Hansen, claiming bogus fines for fabricated contempt. Together they intentionally inundated the record with their fraudulent statements and fabricated evidence their acts spanned from 2011 through 2016. The Defendants



named herein each have used intentional deceit and concealment of evidence in discovery and deceit in presentation of evidence. Dieterle and Pagel knowingly made false statements to the North Dakota District and Supreme Courts in a continued attempt to cover up their wrongdoing and to continue to conceal their conspiracy of fraud.

21. Time and again Dieterle and Pagel would bring forth malicious frivolous ex parte motions against Hansen in their continued conspiracy to manipulate Reich against Hansen, and one such motion was granted to the severe detriment of Hansen and her family. The false statements made by Dieterle and Pagel led to the unlawful invasion of privacy, an unlawful search and seizure of a five year old child while on vacation with Hansen. Reich relied upon Dieterle and Pagels false statements all the while lacking any material evidence to support these statements, and once again Reich retaliated against Hansen for her filing a motion to recuse him. He granted the ex parte motion, and completely obliterated Hansen's maternal rights as a parent to this child, and all was done without a hearing.

22. To further their scheme they intentionally prevented Hansen from having the required hearing within thirty (30) days, in fact Pagel did not provide for a hearing at all. Hansen begged for a hearing to defend against the allegations against her. Later, she was forced and coerced into a hearing set out over ten (10) weeks after the fact. Pagel interfered with Hansen's witness and with Hansen as a witness. Coercing and forcing her to accept the terms he offered. The defendants Dieterle aided by Pagel and Reich have gone so far as to commit acts of kidnapping, conspiracy of kidnapping, invasion of privacy, unlawful search and seizure along with wire and mail fraud upon Hansen and the State of North Dakota and South Dakota.

23. To pressure Hansen, the RICO Defendants have repeatedly cited their fabricated evidence since onset, and their statements claiming they have evidence, however, Dieterle has not provided any evidence to support his malicious, intentional, willful and knowing damaging statements. Instead Dieterle's statements were and are all a part of his scheme to damage Hansen. Their trumped-up charges/ sanctions in false statements to the North Dakota District Court, and the North Dakota Supreme Court, McLean County State's attorney, Ladd Erickson, who has acted in his individual capacity, state agencies, including Social Services and Child Protective Services among others and to individuals. They have also made false statements in an attempt to cover up their wrongdoing and to obstruct Hansen's discovery efforts.

24. In addition, the RICO Defendants Dieterle, Pagel and joined and assisted by Reich directly, adopted a strategy to intentionally coerce the South Central Judicial District Court and North Dakota Supreme Court judges, not based on what the laws should dictate and they have colluded with the District Court judges, Supreme Court judges and have required the assistance of the clerks to procure sham judgments with the basis of criminal type charges against Hansen all the while it being a civil case. Treating the case as of criminal content yet depriving Hansen of any of her rights, even deprivation of her rights to a full and fair hearing, violations of her rights to equal access to the court and violations of her right to address her accuser are just a few of the violations committed against her.

25. Thus, further evidence of Reich intentionally colluding with Dieterle and Pagel. Reich repetitively acted in ways above the law and due to the fact that presiding judge, Gail Hagerty, as well as the North Dakota Supreme Court judges refuses to hold their lower court judges accountable. Hansen presented to Hagerty paperwork showing the fraud, deceit and open collusion, requesting her to act and she intentionally ignored this. It is my belief that Hagerty was

the one to assign Reich to the case, so, it is also my belief she was not going to admit to any wrong doing.

26. Due to the continual abuse from Reich, Pagel and Dieterle towards Hansen, Hansen had each individual lawfully served via Sheriff's service, where Hansen has provided this evidence to this court her Claim of Trespass. See Exhibit A already on file in this case. On April 6, 2016. Reich's response was to intentionally, knowingly and willfully continue violations against Hansen. He filed what he labeled as an amended standing order prohibiting Hansen from filing at any District Court without his prior approval. Hansen tried to file her Complaint against Dieterle, Pagel and Reich on or about April 7, 2016 at the McHenry County court, where Hansen was domiciled at that time. However, North East Judicial District clerk of court Lorraine Myers sends and email to Hansen, stating she is told by another clerk of court to deny filing Hansen 'complaint/claim against Reich. Later Hansen learned that Reich had instructed an email be sent by the State Court Administrator, Sally Holewa, to all clerks of court, to restrict Hansen's access to the court and to deny her the right to file her Complaint/ Claim naming Reich as a Defendant in a suit. This was done by the demand of Reich. The issuance of this email by Ms. Holewa, per order of Reich was a mere two (2) hours after Hansen had Reich lawfully served via Burleigh County Sheriff's office, Hansen's complaint against him.

27. Later, Hansen received in the mail, an order by North East Judicial District judge, Richard Geiger, refusing to file Hansen's lawsuit against Reich. Hansen questions how trial judge Reich of the South Central Judicial District has the authority to claim jurisdiction in an entirely different district and to order another judge to disobey his sworn oath of office and to demand that he aid in violating Hansen's rights. This is clear intentional obstruction of justice by Reich. In no way, does Reich possess the right to deny Hansen's access to the court, especially based

solely upon a motion brought by an opposing party, and without a proper hearing and more so, where he is listed personally as a Defendant in matters. Reich cannot decide matters wherein he is named as a Defendant. This is a grave abuse of discretion. It is not up to Reich to decide if a party can or cannot bring a lawsuit against him. And to intentionally and knowingly interfere in this manner, is a clear abuse of discretion and gross obstruction of justice.

28. Clerk of North East District Court, Myers and trial court judge, Geiger, implicated themselves as co-conspirators to the violations against Hansen at this time by intentionally aiding Reich in committing acts against Hansen. Reich openly retaliated against Hansen's Complaint/ Claim naming him a Defendant by sending the email to Sally Holewa State Court Administrator, as well as to others. Hansen received an order to dismiss, via mail, from the assistant attorney general, and demanded that Hansen file this. This implicates Wayne Stenhejem and his assignees into the existing conspiracy against Hansen. It is the job of Stenehejem to protect the public interest and uphold the integrity of the courts; however, he failed this duty.

29. On May 2, 2016 in an attempt to seek and receive justice for the multiple violations of her constitutional, civil and human rights, violations of due process and to bring awareness of the criminal scheme commenced against her by Dieterle, Pagel and Reich, Hansen filed with the North Dakota Supreme Court a Writ of Prohibition, to prohibit Reich from continuing on in that case due to the continual abuses from him and violations to Hansen by him, along with her Petition for Writ of Mandamus, both of which were just flatly denied by the Supreme Court. These have been filed in this case as Exhibit..... Furthermore, Hansen even provided the North Dakota Supreme Court her Claim/ Complaint of Trespass lawsuit that she had lawfully served on David E. Reich by Burleigh County Sheriff's service in his individual capacity and still they refused to recuse

this man from his position and refused to grant any remedy to Hansen for the injuries she sustained due to the void unenforceable judgments put into place due to his obvious bias against her.

30. Hansen then sent a motion for reconsideration of Writ of Mandamus, Motion for Demand for recusal; Exhibits A-F in that case, Hansen provided an honest affidavit with her filings, which the Supreme Court blatantly and unjustly denied. Hansen then filed for Emergency/ Expedited motion for Answer, Oversight, however, true to form, the Supreme Court judges, acting in their individual capacities, namely, Gerald VandeWalle, Dale Sandstrom, Daniel Crothers, Lisa Fair-McEvers, Linda Ronning-Kapsner, continued to abuse Hansen and in fact knowingly allowed the abuses against Hansen by Dieterle, Pagel and Reich to continue.

31. On May 25, 2016 as docket entries: No. 15 - 17 “The Clerk of the Supreme Court’s office is directed not to accept any further filings in any matter in which this Court’s determination is final or in which Angela Hansen has failed to timely appeal any final order or judgment of a district court involving Hansen.” This is another unlawful, malicious deprivation of Hansen’s rights for redress of grievances, and further evidence of the known collusion of the actors in this RICO case. It is the duty of the Supreme Court to allow the right for redress for grievances. This is open retaliation in violation of Hansen’s right to redress for grievances and is a direct violation of her Constitutional rights. Hansen had asked for a hearing on these motions, and all was denied. Thus the Supreme Court judges and clerk intentionally, knowingly violated their individual oath sworn duties, thus is a breach of fiduciary duty, breach of contract/oath and each knowingly entered the arena of conspiracy with the lower court, namely Reich, when they chose to act in ways to conceal the gross injustices being taken upon Hansen. The acts of these individuals provided direct collusion with and providing aid to Dieterle and Pagel while

intentionally concealing the conduct of the lower court judge. All of these acts were and are to the continual intentional and willful detriment of Hansen.

32. Each individual willfully, intentionally and knowingly refused to correct the harm caused by Dieterle, Pagel and Reich to Hansen. The Supreme Courts response, telling the clerk of court, Penny Miller to deny any future filings of Hansen violated the rights of Hansen yet again. They unjustly placed a duty upon the clerk of the Supreme Court, Penny Miller. Hansen would question if a clerk of court has the authority to produce orders by having her sign and file an unenforceable order that Hansen against Hansen without proper due process. It is the duty of the North Dakota State Supreme Court to hear a variety of Motions including appeals, however, they improperly and unjustly aided in the deprivation of rights and violations against Hansen.

33. Because the Supreme Court continually failed in their duty, in fact they each are guilty of breach of fiduciary duty, breach of contract by each violating their sworn Oaths of Office, and instead aided in the conspiracy by their actions and inactions in an attempt to conceal the fraud and conspiracy being committed against Hansen. With the failures of the Supreme Court judges, Reich felt it his right to continue to violate Hansen's rights time and again. His open arrogance, hostility, abuse and obvious tangible retaliation against Hansen only increased from the time he was first assigned to the case until the present.

34. Due to Hansen speaking up and defending her rights, South Central Judicial District Judge David E. Reich has continued to retaliate against Hansen, and has even gone so far as to coerce Richard Geiger of the North East Judicial District, other South Central Judicial District judges, such as presiding judge, Gail Hagerty, and the Supreme Court judges, VandeWalle, Crothers, Sandstrom, Fair-McEvers, Ronning- Kapsner, and State Court Administrator, Sally Holewa into

his scheme of intentional conspiracy. Due to Hansen trying to enforce her rights, and speaking up to do so, she never stood a chance in the District Court under Reich or any of his colleagues and it became glaringly obvious that she would never receive justice in the North Dakota Supreme Court either. The scheme of routine collusion to deprive Hansen her rights was established and well underway.

35. The RICO Defendants' conduct violates the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1961 et seq., with predicate acts of extortion, mail and wire fraud, money laundering, obstruction of justice, witness tampering, kidnapping, fraud and conspiracy to commit acts of extortion, conspiracy of obstruction of justice, conspiracy to kidnap, retaliation, and coercion among others. Also, they are guilty of violations of the Hobbs Act and in addition, Defendants' conduct constitutes common law fraud, unjust enrichment, and trespass to chattels, unlawful search and seizure, civil conspiracy and violations under color of law, along with a multitude of other intentional civil rights violations among others. Additional violations include that of 42 U.S.C. 1982, 1983 and 42 U.S.C. 1985 and 18 U.S.C. 1346 in 1988 and 18 U.S.C. 241, 242 and 245.

36. Hansen alleges malicious, reckless and unwarranted denial of due process, denial of equal and fair access to the courts, denial of justice, deprivation of rights. Conspiracy to commit fraud, extortion, conspiracy to extort. As a result, Defendants' misconduct entitles Hansen to injunctive relief precluding Defendants from attempting to enforce the fraudulently sought and obtained judgments emanating from the proceedings of Dieterle v. Dieterle, namely the void judgments based upon the fraud brought forth by Dieterle and Pagel, and specifically the Ex Parte judgment which also is unlawful, thus void and is unenforceable, damages and other relief.

37. On top of attorney's fees and expenses, Hansen's business has been dramatically harmed in a multitude of ways. In addition, many of the RICO Defendants extortionate acts have presented unfair and false representations of Hansen's business practices, harming Hansen's reputation and goodwill. As alleged through, these harms represent the precise result intended by the RICO Defendants' actions and words have proven that they have no intention of stopping. Because of the lower courts collusion with Dieterle and Pagel, Hansen has continued to suffer irreparable significant harm at the hands of the RICO Defendants and their unlawful scheme.

38. Their premeditated scheme has affected both North and South Dakota, three sheriff's departments, two in North Dakota and one in South Dakota and numerous state agencies in and of North and South Dakota. This group of individuals acted as an association-in-fact for the purpose of illegally causing multiple and substantial harms to Hansen. And corruptly influencing and attempting to corruptly influence the outcome of the state court and Supreme Court proceedings.

## **I. THE PARTIES TO EACH CAUSE OF ACTION**

### **A. Plaintiff/ Injured Party**

40. Plaintiff/ Injured Party Angela (Angie) L. Hansen ("Hansen") has resided in North Dakota and was domiciled in North Dakota for 15 years and at the time of the injuries sustained.

### **B. PARTIES AND RELEVANT NON-PARTIES**

#### **B.1. RICO Defendants**

41. The defendants listed herein are the individuals who have conspired to engage in a pattern of racketeering activity, have each committed criminal acts as part of their scheme to defraud and extort Hansen, and have each participated in the operation of or the management of the criminal enterprise. These defendants shall be referred to herein as the "RICO Defendants."



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42. Under Defendants continuing deceit, abuse of process, malicious persecution of void judgments, violations under color of law, Hansen has no choice but to seek justice within Federal Jurisdiction, on grounds of Defendants' racketeering activities.

43. Defendant Shannon R. Dieterle of Sheridan County, North Dakota is and has acted as the Ring leader of the association-in-fact enterprise and is responsible for bringing forth and pursuing enforcement of fraudulent void judgments. Exercise of jurisdiction over Dieterle is reasonable and proper in this District for the reasons set forth in Paragraphs 79, 80, 82 *infra*.

44. Each of the following RICO Defendants are acting outside of their Oaths of Office and in violation of their sworn Oaths and thus are acting in ways of treason as well as acting in ways of violations under color of law. Each of these following RICO Defendants are thus acting in their individual capacities and judgment against them is brought sought in their individual capacities.

45. Defendant Rodney Pagel of Burleigh County, Bismarck, North Dakota is and has been counsel for RICO Defendant Dieterle and has acted as a co-conspirator and has assisted in aiding and abetting in the association-in-fact enterprise and is equally responsible as Dieterle for bringing forth and pursuing until devastation fraudulent void unenforceable judgments against Hansen. Exercise of jurisdiction over Pagel is reasonable and proper in this District for the reasons set forth in paragraphs 81, 82 *infra*.

46. Defendant the Law Offices of Pagel Weikum of Bismarck, North Dakota, is a partnership located at 1715 Burnt Boat Dr. Bismarck, North Dakota, and is therefore a resident business of the State of North Dakota. Exercise of jurisdiction over the Law Offices of Pagel and Weikum is reasonable and proper in this District for the reasons set forth in paragraph 83 *infra*.

47. Defendant Pagel Weikum, PLLC is a professional limited liability Corporation located at 1715 Burnt Boat Dr. Bismarck, North Dakota and therefore is a citizen of the State of North Dakota. Exercise of jurisdiction over the Law Offices of Pagel and Weikum is reasonable and proper in this District for the reasons set forth in paragraph 83, *infra*.

48. Defendant David E. Reich, in his individual capacity, is a resident of Burleigh County, and/or conducts business in Bismarck, North Dakota. David E. Reich P.O. Box 1013 Bismarck, North Dakota, 58502-1013, is an individual residing in the State of North Dakota and thus is a citizen of North Dakota. Reich has delivered and enforced the void unenforceable judgments against Hansen, and has administered the proceeds from judgments entered against Hansen. Exercise of jurisdiction over David E. Reich is reasonable and proper in this District for the reasons set forth in paragraph 84 *infra*.

49. Defendant Donald Jorgensen/ and or his trust/ estate (if necessary) in his individual capacity a resident and/or conducts business in Burleigh County, North Dakota. Jorgensen is an individual residing in the State of North Dakota and thus is a citizen of the State of North Dakota. Jorgensen was the initial decision maker in a case that was later handed over to Reich. Exercise of jurisdiction over Donald Jorgensen is reasonable and proper in this District for the reasons set forth in paragraph 87 *infra*.

50. Defendant Gail Hagerty, in her individual capacity, a resident of and/or conducts business in Burleigh County, North Dakota. Gail Hagerty P.O. Box 1013 Bismarck, North Dakota, 58502-1013, is an individual residing in the State of North Dakota and thus is a citizen of North Dakota. Hagerty is in a position to oversee lower court judges, and has failed to properly oversee these individuals, even though proof of wrongs has been presented to her. Exercise of jurisdiction over

Gail Hagerty is reasonable and proper in this District for the reasons set forth in paragraph 87 *infra*.

51. Defendant Gerald VandeWalle, in his individual capacity, a resident of and/or conducts business in Burleigh County, North Dakota, Gerald VandeWalle 600 East Blvd. Ave. Bismarck, North Dakota, 58505-0530, is an individual residing in the State of North Dakota and thus is a citizen of North Dakota. VandeWalle is in a position to oversee lower court judges, and has failed to properly oversee these individuals, even though proof of wrongs has been presented to him. Exercise of jurisdiction over Gerald VandeWalle is reasonable and proper in this District for the reasons set forth in paragraph 87 *infra*.

52. Defendant Dale Sandstrom, in his individual capacity a resident of and/or conducts business in Burleigh County, North Dakota. Dale Sandstrom who can be located at 600 East Blvd. Ave, Bismarck, North Dakota. 58505-0530, is an individual residing in the State of North Dakota and thus is a citizen of North Dakota. Dale Sandstrom is in a position to oversee lower court judges, and has failed to properly oversee these individuals, even though proof of wrongs has been presented to him. Exercise of jurisdiction over Dale Sandstrom is reasonable and proper in this District for the reasons set forth in paragraph 87 *infra*.

53. Defendant Carol Ronning Kapsner, in her individual capacity a resident and/or conducts business in Burleigh County, North Dakota, who can be located at 600 East Blvd. Ave, Bismarck, North Dakota. 58505-0530, is an individual residing in the State of North Dakota and thus is a citizen of North Dakota. Carol Ronning-Kapsner is in a position to oversee lower court judges, and has failed to properly oversee these individuals, even though proof of wrongs has

been presented to her. Exercise of jurisdiction over Carol Ronning-Kapsner is reasonable and proper in this District for the reasons set forth in paragraph 87 *infra*.

54. Defendant Lisa Fair McEvers, in her individual capacity a resident and/or conducts business in Burleigh County, North Dakota, who can be located at 600 East Blvd. Ave, Bismarck, North Dakota. 58505-0530, is an individual residing in the State of North Dakota and thus is a citizen of North Dakota. Lisa Fair-McEvers is in a position to oversee lower court judges, and has failed to properly oversee these individuals, even though proof of wrongs has been presented to her. Exercise of jurisdiction over Lisa Fair-McEvers is reasonable and proper in this District for the reasons set forth in paragraph 87 *infra*.

55. Defendant Daniel Crothers, in his individual capacity a resident and/or conducts business in Burleigh County, North Dakota, who can be located at 600 East Blvd. Ave, Bismarck, North Dakota. 58505-0530, is an individual residing in the State of North Dakota and thus is a citizen of North Dakota. Daniel Crothers is in a position to oversee lower court judges, and has failed to properly oversee these individuals, even though proof of wrongs has been presented to him. Exercise of jurisdiction over Daniel Ctothers is reasonable and proper in this District for the reasons set forth in paragraph 87 *infra*.

56. Defendant Richard Geiger, in individual capacity a resident and/ or conducts business in McHenry county, North Dakota, who can be located at Walsh County Court House, 600 Cooper Ave. Grafton, N.D. 58237-1509, is an individual residing in the State of North Dakota and thus is a citizen of North Dakota. Richard Geiger is hereby implicated into this by his collusion with David E. Reich. Exercise of jurisdiction over Richard Geiger is reasonable and proper in this District for the reasons set forth in paragraph 87 *infra*.

57. Defendant Penny Miller, in her individual capacity, a resident and/or conducts her business in Burleigh County, North Dakota, who can be located at 600 East Blvd. Ave, Bismarck, North Dakota. 58505-0530, is an individual residing in the State of North Dakota and thus is a citizen of North Dakota. Exercise of jurisdiction over Penny Miller is reasonable and proper in this District for the reasons set forth in paragraph 87 *infra*.

58. Defendant Lorraine Myers, in her individual capacity, a resident and/or conducts business in McHenry County, North Dakota, is an individual residing in the State of North Dakota and thus is a citizen of North Dakota. Exercise of jurisdiction over Lorraine Myers is reasonable and proper in this District for the reasons set forth in paragraph 87 *infra*.

59. Defendant Sally Holewa, in her individual capacity a resident, and/or conducts her business in Burleigh County, North Dakota, who can be located at 600 East Blvd. Ave, Bismarck, North Dakota. 58505-0530, is an individual residing in the State of North Dakota and thus is a citizen of North Dakota. Exercise of jurisdiction over Sally Holewa is reasonable and proper in this District for the reasons set forth in paragraph 87 *infra*.

60. Defendant Donna Wonderlich, in her individual capacity, a resident and/or conducts business in Burleigh County, North Dakota, who can be located at 600 East Blvd. Ave. Dept. 180, Bismarck, North Dakota. 58505-0530, is an individual residing in the State of North Dakota and thus is a citizen of North Dakota. Exercise of jurisdiction over Donna Wonderlich is reasonable and proper in this District for the reasons set forth in paragraph 87 *infra*.

61. Defendant Kathy Mindt, in her individual capacity, a resident and/or conducts business in Sheridan County, North Dakota, who can be located at P.O. Box 410, McClusky, North Dakota. 58463-0410, is an individual residing in the State of North Dakota and thus is a citizen of North

Dakota. Exercise of jurisdiction over Kathy Mindt is reasonable and proper in this District for the reasons set forth in paragraph 87 *infra*.

62. Defendant Sylvia Schell, in her individual capacity, a resident and/or conducts business in Sheridan County, North Dakota, is an individual residing in the State of North Dakota and thus is a citizen of North Dakota. Exercise of jurisdiction over Sylvia Schell is reasonable and proper in this District for the reasons set forth in paragraph 87 *infra*.

63. Defendant Petra Hulm, in her individual capacity, a resident and/or conducts business in Burleigh County, North Dakota, who can be located at P.O. Box 410, McClusky, North Dakota. 58463-0410, is an individual residing in the State of North Dakota and thus is a citizen of North Dakota. Exercise of jurisdiction over Petra Hulm is reasonable and proper in this District for the reasons set forth in paragraph 87 *infra*.

64. Defendant Ladd Erickson, in his individual capacity, a resident and/or conducts business in McLean County, North Dakota, is and individual residing in the State of North Dakota and thus is a citizen of North Dakota. Exercise of jurisdiction over Ladd Erickson is reasonable and proper in this District for the reasons set forth in paragraph 87 *infra*.

65. Defendant Richard Riha, in his individual capacity, a resident and/or conducts business in Burleigh County, North Dakota, who can be located at 514 East Thayer Ave. Bismarck, North Dakota. 58501 is and individual residing in the State of North Dakota and thus is a citizen of North Dakota. Exercise of jurisdiction over Richard Riha is reasonable and proper in this District for the reasons set forth in paragraph 87 *infra*.

66. Defendant Wayne Stenehejem, in his individual capacity, a resident and/or conducts business in Burleigh County, North Dakota, who can be located at 600 East Blvd. Ave. Dept.

125 Bismarck, North Dakota. 58505 is an individual residing in the State of North Dakota and thus is a citizen of North Dakota. Exercise of jurisdiction over Wayne Stenehejem is reasonable and proper in this District for the reasons set forth in paragraph 87 *infra*.

**C. Additional Co-Conspirators**

67. Certain other non-party individuals and business entities played roles, direct or indirect, in the scheme to defraud, extort and cause substantial harms to Hansen. Foremost among these individuals and business entities are the following:

68. Trent Naser, in his individual capacity, a resident and/or conducts business in Sheridan County, North Dakota, is an individual residing in the State of North Dakota and thus is a citizen of North Dakota. Exercise of jurisdiction over Trent Naser is reasonable and proper in this District for the reasons set forth herein and in paragraph 87 *infra*.

69. Matt Lisic, in his individual capacity, a resident and/or conducts business in Sheridan County, North Dakota, is an individual residing in the State of North Dakota and thus is a citizen of North Dakota. Exercise of jurisdiction over Matt Lisic is reasonable and proper in this District for the reasons set forth herein and in paragraph 87 *infra*.

70. Delbert Hoffman, in his individual capacity, a resident and/or conducts business in Sheridan County, North Dakota, is an individual residing in the State of North Dakota and thus is a citizen of North Dakota. Exercise of jurisdiction over Delbert Hoffman is reasonable and proper in this District for the reasons set forth here and in paragraph 87 *infra*.

71. Daniel Reich, in his individual capacity, a resident and/or conducts business in Sheridan County, North Dakota, is an individual residing in the State of North Dakota and thus is a



citizen of North Dakota. Exercise of jurisdiction over Daniel Reich is reasonable and proper in this District for the reasons set forth herein and in paragraph 87 *infra*.

72. Sheridan County Sheriff's Department, located at 215 2<sup>nd</sup>. St. E. McClusky, North Dakota. 58463, as a government and business entity in Sheridan County, North Dakota, is an entity existing in the State of North Dakota, thus exercise of jurisdiction over this entity is reasonable and proper in this District for the reasons set forth herein and in paragraph 87 *infra*.

73. Jerauld County Sheriff's Department, located at 205 Wallace Ave. S. Wessington Springs, South Dakota, 57382, as a government and business entity in Jerauld County, South Dakota, is an entity in the State of South Dakota, thus exercise of jurisdiction over this entity is reasonable and proper in this District for the reasons set forth in paragraph 87 *infra*.

74. Unknown names of individuals involved on September 4, 2015.

**D. Remaining Defendants,**

75. Whether known or unknown, hereby called John Doe and Jane Doe. Social Service, CPS, agencies of McLean County, North Dakota.

**II. SUBJECT MATTER JURISDICTION AND VENUE**

76. X. Jurisdiction: has been set out and established in initial Complaint in this Case No. 1:17-cv-055.

1. a. Jurisdiction is asserted pursuant to the following statutory authorities:

b. All statements as set out in initial complaint as if fully stated herein.

c. There are no statute of limitations on murder, kidnapping and/or fraud on the Court.

- d. This Court has subject matter jurisdiction over Hansen's claims under 28 U.S.C. §§ 1331 and 1332, and under 18 U.S.C. § 1964(c) and 28 U.S.C. 1367.
- e. Hansen's claims for relief arise under 18 U.S.C. § 1961 *et seq.*, as hereinafter more fully appears.
- f. Federal District Court has jurisdiction by statute under;  
18 U.S.C. § 1964(c).  
18 U.S.C. § 1965  
28 U.S.C. § 1331  
28 U.S.C. § 1332  
18 U.S.C. § 1961  
42 U.S.C. § 1983
- f. Diversity of citizenship between parties.
- g. The amount in controversy exceeds \$ 75,000.00 exclusive of interest and costs.
- h. This court has supplemental jurisdiction over Hansen's claims under 28 U.S.C. § 1367.
- i. Venue is proper in this District under 28 U.S.C. § 1391(b)(2), as the events giving rise to this action occurred in this District, and also under 18 U.S.C. §1965.
- j. There is relevant Federal law regarding patterns of racketeering activity, R.I.C.O. and specifically also with regard to both mail and wire fraud, 18 U.S.C. § 1341 and 18 U.S.C. §1343 respectively, as well as extortion, (Hobbs). Therefore the matters herein should be considered only within the bounds of Federal Law.
- k. The Federal Law of the preceding paragraph is not in any "direct conflict" with any laws of the State of North Dakota. Under 42 U.S.C. §1983, you may sue state or local officials for the "deprivations of any rights, privileges, or immunities secured by the Constitution and [Federal Laws]."
- l. Also under 42 U.S.C. § 1985 and § 1986.

77. **Venue:**

78. Is proper in this District under 28 U.S.C. § 1391(b)(2), as the events giving rise to this action occurred in North Dakota by Defendants in North Dakota.

And also under 18 U.S.C. § 1965. Under 28 U.S.C. § 1391 (1)(2)(3).

### **Personal Jurisdiction**

79. Exercise of jurisdiction over Defendant Dieterle is reasonable and proper in this Federal District court because Dieterle is a citizen of the State of North Dakota and because he conducts his business activities within the state. Through his activities in North Dakota district court, Dieterle has served as the ringleader in the association-in-fact enterprise to defraud and extort Hansen, working closely with the other RICO Defendants in this action. For Hansen's claims for violations of 18 U.S.C. § 1962, the exercise of jurisdiction over Dieterle is proper in this District pursuant to 18 U.S.C. § 1965(a).

80. Dieterle also engaged in intentional, knowingly wrongful, illegal and/ or tortious acts the effects of which Dieterle knew would be felt by Hansen. For example, Dieterle has directed multitudes of phone calls, emails, and other forms of communication to his co-conspirators in North Dakota for the purpose of planning and carrying out their conspiracy and fraud and participated in and orchestrated campaigns in North Dakota to influence state and district officials, real estate brokers, Social Services, sheriff's and deputies for the purpose of extorting money, property and a child from Hansen. Also, as set forth more fully herein, Dieterle's co-conspirators and agents have engaged in intentional, wrongful, illegal and/or tortious acts in North Dakota and in South Dakota. Dieterle was and is aware of the effects in North Dakota of those acts, the activities of Dieterle's co-conspirators and agents were to the benefit of Dieterle,

and his co-conspirators and agents, and his co-conspirators and agents were working at the direction, under control, at the request and/or on behalf of Dieterle in committing those acts, violations of 18 U.S.C. 1001, violations of 18 U.S.C. § 1621, 1622, 1623, 18 U.S.C. § 880, violations of 18 U.S.C. § 1957, and give rise to Hansen's claims, as set forth more fully herein.

81. Exercise of jurisdiction over Defendant Rodney Pagel is reasonable and proper in this Federal District court because Pagel is a citizen of the State of North Dakota and because he conducts extensive business activities within the state. Pagel is a partner and owner of the Law Offices of Pagel and Weikum, which is located in Bismarck and does business in North Dakota. Through his activities, Pagel has served as the primary co-conspirator and co-ringleader in the association-in-fact to defraud and extort Hansen, working closely with the other RICO defendants in this action. For Hansen's claims for violations of 18 U.S.C. § 1962 and North Dakota state law, exercise of jurisdiction over Pagel is proper pursuant to 18 U.S.C. § 1965(a) and N.D. Rule 4.

82. At all times relevant herein Dieterle and Pagel were acting in concert as co-conspirators in perpetrating the conspiracy and fraud against Hansen. By and through their co-conspirators, agents and/or assignees, Dieterle and Pagel has transacted business and engaged in tortious conduct in North Dakota and in South Dakota which give rise to Hansen's claims, as set forth more fully herein.

83. Exercise of jurisdiction over the Law Offices of Pagel Weikum is reasonable and proper in this Federal District court because the Law Offices of Pagel Weikum is a business entity of North Dakota and because they conduct extensive business activities in the State. Further, by and through the activities of Pagel described above, the Law Offices of Pagel Weikum have

served as key players in the conspiracy against Hansen. For Hansen's claims for violations of 18 U.S.C. §1962 and North Dakota state law, exercise of jurisdiction over the Law Offices of Pagel Weikum is proper pursuant to 18 U.S.C. 1965(a) and N.D. Rule 4. Additional violations by Pagel include 42 U.S.C. §§ 1983, 1985, 1986, and 18 U.S.C. 1621, 1622, 1623. Violations of 18 U.S.C. § 1505 and 18 U.S.C. §1512 and Title 18 U.S.C. § 241.

84. Exercise of jurisdiction over Defendant David E. Reich is reasonable and proper in this Federal District Court because Reich is a resident of the State of North Dakota and because he conducts his business activities within the state. Through his intentional, knowing willful acts in North Dakota District Court, Reich has acted as a co-conspirator in the association-in-fact enterprise to defraud and extort Hansen, working closely with Dieterle and Pagel as well as other RICO Defendants in this action. For Hansen's claims for violations of 18 U.S.C. §1962 and North Dakota state law, exercise of jurisdiction over the Reich is proper pursuant to 18 U.S.C. 1965(a) and N.D. Rule 4.

85. Reich has also engaged knowingly, willfully and intentionally in wrongful, illegal, and/or tortious acts that the effects of which Reich knew and intended would be felt by Hansen. Reich participated in campaigns in North Dakota to influence State officials knowingly for the purpose of retaliation under 42 U.S.C. 12203 – Prohibition against retaliation and coercion, acts of fraud upon the court. (a) No person shall discriminate against any individual because such individual has opposed any act or practice made unlawful by this chapter or because such individual made a charge, testified, assisted or participated in any manner in an investigation, proceeding, or hearing under this chapter. (b) Interference, coercion, or intimidation it shall be unlawful to coerce, intimidate, threaten, or interfere with any individual. Other acts of Reich against Hansen

are 42 U.S.C. § 1985 – conspiracy to interfere with civil rights. (2) obstructing justice; intimidating a party, witness, or juror. (3) Depriving a person of rights or privileges.

86. Other violations by Reich against Hansen giving ride to Hansen’s claims herein include but are not limited to 18 U.S.C. 242 Deprivation of Rights- color of law. “When a judge acts where he or she does not have jurisdiction to act, the judge is engaged in an act or acts of treason.” US. V. Will, 449 US 200, 216, 101 S. Ct, 471 66L ED 2<sup>nd</sup> 392, 406 (1980) Cohens v. Virginia, 19 US (6 Wheat) 264, 404, 5 Led 257 (1821). Violations of Rule 3 of the North Dakota Code of Judicial Conduct. Violation of the North Dakota Constitution Article 1 § 16. Violations of N.D. R. Ct. 3.2(a)(3). Violations of N.D. R. Ct. 2.6. Violations of 42 U.S.C. § 14141 and violations of 42 U.S.C. § 1985(3) and violations of the First, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Fourteenth and Nineteenth Amendments.

87. Exercise of jurisdiction over Defendants Pulkrabek, Hagerty, VandeWalle, Sandstrom, Ronning-Kapsner, Fair-McEvers, Crothers, Geiger, Miller, Myers, Holewa, Wonderlich, Mindt, Schell, Stenehejem, Riha and Erickson and Additional Co-Conspirators, are all residents of the State of North Dakota. For Hansen’s claims for violations of 18 U.S.C. § 1962, the exercise of jurisdiction over each of these defendants is proper in this District pursuant to 18 U.S.C. § 1965(a),(b). The ends of justice require application of the nationwide service provisions of 18 U.S.C. § 1965(b) because there is no district in which all of the RICO Defendants could otherwise be tried together.

88. The Enterprise had an ongoing organization and that its members functioned as a continuing unit in order to establish and association-in-fact enterprise, this enterprise includes others known and unknown. Each stated defendant participated in the operation or management