knew or should have known as it was in fact filed by Hansen's attorney in advance of the hearing.

41. Defendants Dieterle, Pagel, the Law Offices of Pagel and Weikum, and Reich have committed numerous predicate acts, including mail and wire fraud, extortion, obstruction of justice, money laundering, and witness tampering. The mail and wire fraud violations include those identified herein, and in their documents and/or exhibits in which the Law Offices of Pagel and Weikum and of Reich used or cause to be used the mail or wires in furtherance of the RICO Defendants' scheme to defraud. The Law Offices of Pagel and Weikum and Reich in his individual capacity, have also engaged in extortion of Hansen and fraudulent conduct through numerous acts, including by participation in causing public humiliation and damages all of which were and are based solely upon false and misleading statements about Hansen and the Dieterle litigation (including making false statements to the North Dakota South Central Courts and the North Dakota Supreme Court) manufacturing supposed evidence, which none actually exists, stated only as perversion of Dieterle's personal opinion and nothing more against Hansen, procuring baseless criminal charges against Hansen in a civil matter, colluding with court officials and pressuring Reich to ensure a negative outcome for Hansen during litigation, and threatening and causing threats to be made to Hansen. In addition, The Law Offices of Pagel Weikum have engaged in obstruction of justice by filing and/ or causing to be filed in multiple North Dakota Courts documents, including affidavits sworn under penalty of perjury, falsely representing Hansen and otherwise misrepresenting the RICO Defendants interactions with Hansen. Also the Law Offices of Pagel Weikum have committed wire fraud and engaged in money laundering by knowingly causing funds to be transported, transmitted or transferred from Hansen to Dieterle, Pagel, Knudson and unknown additional parties with the intent that such

payments would fund the RICO Defendants criminal activity. The Law Offices of Pagel Weikum have also engaged in witness tampering through Pagel's knowing intimidation, threats, misleading conduct, and corrupt persuasion toward Dr. Ascano, Dr. Autumn Ascano and Hansen, with the specific intent to influence, delay, and prevent Dr. Ascano, Ms. Autumn Ascano's testimonies in the South Central Judicial District Court.

42. RICO Defendants Miller, Sylvia Schell, Mindt, Holewa, Wonderlich, Hulm, Myers, Geiger, Riha, have committed numerous mail and wire fraud violations, including those identified herein, in which they each in their individual capacities, collectively and separately used or cause to be used the mail or wires in furtherance of the RICO Defendants scheme to defraud. Miller, Schell, Mindt, Wonderlich, Hulm, Myers, Geiger and Riha have also engaged in extortion of Hansen and fraudulent conduct by participating in a public smear campaign of attacks based on false and misleading statements about Hansen and the Dieterle litigation by manufacturing or causing to be manufactured false evidence, and by each one independently and collectively engaging in obstruction of justice by filing or causing to be filed in North Dakota Judicial courts documents, including an order by Geiger who acted in straight collusion on the request and behalf of Reich directly, this order falsely represented Hansen. Wonderlich refused Hansen adequate ADA accommodations when Hansen asked for such. Sally Holewa provided via email an email that she had received from Reich, in his clear effort to obstruct justice for Hansen. Mindt and Schell also acted by the unjust influence of Reich against Hansen, in denying her, her right to access the courts in seeking justice. Hansen had sent via certified return receipt a complaint with evidence to Riha, who responded obstructing the justice that Hansen was seeking.

- 43. The conduct of each of the RICO Defendants described in the above paragraphs. Constitutes a pattern of racketeering activity within the meaning of 18 U.S.C. § 1961 (5).
- Hansen was injured and her business and property by reason of the RICO Defendants' violations of 18 U.S.C. § 1962 (c). The injuries to Hansen caused by reason of the violations of 18 U.S.C. § 1962(c) include but are not limited to damage to Hansen's reputation and goodwill; the impairment of Hansen's interest in sales of her business; and attorney's fees and costs to defend herself in objectively baseless, improperly motivated sham litigation in the North Dakota South Central Judicial District and the North Dakota Supreme Courts, including fees and costs associated with exposing the RICO Defendants' pervasive fraud in the South Central Judicial District and North Dakota Supreme Courts as well as brining this Complaint.
- 45. Further, these injuries to Hansen were a direct, proximate and reasonably foreseeable result of the violation of 18 U.S.C. § 1962. Hansen and her children are the ultimate victims of the RICO Defendants' unlawful Enterprise. Hansen has been and will continue to be injured in her business and has lost her rightly property due to the acts of the RICO Defendants, in an amount to be determined at trial.
- 46. Pursuant to 18 U.S.C. § 1964(c), Hansen is entitled to recover treble damages plus costs and attorney's fees from the RICO Defendants.
- 47. Hansen is further entitled to, and should be awarded, a preliminary and permanent injunction that enjoins Defendants, their assignees, and anyone else acting in concert with themfrom commencing, prosecuting, or advancing in any way- directly or indirectly- any attempt to recognize or enforce the Dieterle judgment in any court, tribunal, or administrative agency in any jurisdiction, in the United States or abroad, including any attempt to attach or seize any of

Hansen's assets, whether pre-judgment of otherwise, until Court determines the merits and enters judgment on Hansen's claims against the Defendant's in this action.

WHEREFORE, Hansen prays for judgment as set forth below.....

# SECOND CLAIM FOR RELIEF Conspiracy to Violate RICO, Violation of 18 U.S.C. § 1962(d) Against All RICO Defendants

- 1. Hansen realleges and incorporates herein by reference each and every foregoing paragraph of this Amended Complaint as if set forth in full.
- 2. The RICO Defendants have unlawfully, knowingly, and willfully combined, conspired, confederated and agreed together and with others to violate 18 U.S.C. § 1962(c) as described above, in violation of 18 U.S.C. § 1962(d).
- 3. Upon information and belief, the RICO Defendants knew that they were engaged in a conspiracy to commit the predicate acts, and they knew that the predicate acts were part of such racketeering activity, and the participation and agreement of each of them was necessary to allow the commission of this pattern of racketeering activity. This conduct constitutes a conspiracy to violate 18 U.S.C. § 1962(c), in violation of 18 U.S.C. § 1962(d).
- 4. Upon information and belief, the RICO Defendants agreed to conduct or participate, directly or indirectly in conduct, management, or operation of the Enterprise's scheme through a pattern of racketeering activity in violation of 18 U.S.C. § 1962(c).
- 5. Each RICO Defendant knew about and agreed to facilitate the Enterprise's scheme to extort property and money from Hansen. It was part of the conspiracy that the RICO Defendants and their co-conspirators would commit a pattern of racketeering activity in the conduct of the affairs of the Enterprise, including acts of racketeering set forth in the above stated paragraphs.

- 6. Hansen is entitled to recover compensatory and punitive damages plus costs and attorneys' fees from the RICO Defendants.
- 7. As a direct and proximate result of the RICO Defendants' conspiracy, the acts of racketeering activity of the Enterprise, the overt acts taken in furtherance of that conspiracy, and violations of 18 U.S.C. § 1962(d), Hansen has been injured in her business and property, including damage to Hansen's reputation and goodwill; the impairment of Hansen's interest in marketing, improvements, services and sales; and the attorneys' fees and costs to defend herself in objectively baseless, improperly motivated sham litigation in North Dakota South Central Judicial District and the North Dakota Supreme Court and in related litigation, including the attorney's fees and costs associated with exposing the RICO Defendants' pervasive fraud in the Dieterle proceedings.
- 8. Pursuant to 18 U.S.C. § 1964(c), Hansen is entitled to recover treble damages plus costs and attorneys' fees from the RICO Defendants.
- 9. Hansen is further entitled to, and should be awarded, a preliminary and permanent injunction that enjoins Defendants, their assignees and anyone else acting in concert with themfrom commencing, prosecuting, or advancing in any way- directly or indirectly- any attempt to recognize or enforce the Dieterle judgment in any court, tribunal, or administrative agency in any jurisdiction, in the United States or abroad, including any attempt to attach or seize any of Hansen's assets, whether pre-judgment or otherwise, until this Court determines the merits and enters judgment on Hansen's' claims against Defendants in this action.

#### THIRD CLAIM FOR RELIEF

### Fraud Against All Defendants

- 1. Hansen realleges and incorporates herein by reference each and every foregoing paragraph of this Amended Complaint as if set forth in full.
- 2. Defendants and their agents have knowingly misrepresented, omitted, and/or concealed material facts in their pleadings and representations before the North Dakota Courts, in their communications to state and government agencies and officials, and in their communications to Hansen and the media. Each and every Defendant has personally engaged in this conduct, or knew or should have known that the other Defendants were engaged in it on his or her behalf. These false representations are detailed throughout this Amended Complaint and include the falsified affidavits, briefs and motions, supposed evidence and the fraudulent endorsements of the fraudulent judgments.
- 3. Defendants made these false representations while knowing that their misrepresentations were materially false and/or their omissions were material.
- 4. Defendants further made these misrepresentations and/or omissions with the intent of obtaining favorable rulings from the North Dakota South Central Judicial District Court and the North Dakota Supreme Courts, and propagating dales information about Hansen to the public.
- 5. Defendants further made these misrepresentations and/or omissions with the intent of obtaining favorable rulings from the South Central Judicial District and North Dakota Supreme Courts, pressuring state agencies to pursue investigations of Hansen and propagating false information about Hansen to the media, the public and additional offices. These material misrepresentations and/or omissions have been reasonably and justifiably relied upon by Hansen the North Dakota Courts and state and government agencies and officials, and the public by

means of its acceptance of Defendants' misrepresentations and omissions and its failure to take meaningful and corrective action.

- 6. As a direct, proximate, and foreseeable result of Defendant's fraud, Hansen has been harmed, including significant pecuniary, reputational and other damages. These injuries include significant damage to Hansen's reputation and goodwill, and the attorney's fees and costs to defend herself in objectively baseless, improperly motivated sham litigation in North Dakota.
- 7. Defendants have engaged in malicious, willful and fraudulent commission of wrongful acts and, because of the reprehensible and outrageous nature of these acts, Hansen is entitled to, and should be awarded, punitive damages against each of the Defendants.
- 8. Hansen is entitled to compensatory and punitive damages, trebled by law, and reasonable attorney's fees and costs.
- 9. Hansen is further entitled to, and should be awarded preliminary and permanent injunction that enjoins Defendants, their assignees and anyone else acting in concert with themfrom commencing, prosecuting, or advancing in any way- directly or indirectly- from any attempt to recognize or enforce the Dieterle litigation in any court, tribunal, or administrative agency in any jurisdiction, in the United States or abroad, including any attempt to attach or seize any of Hansen's assets, whether pre-judgment or otherwise, until this Court determines the merits and enters judgment on Hansen's claims against Defendants in this action.

# FORTH CLAIM FOR RELIEF Kidnapping N.D.C.C. 12.1-18, Hostage Taking 18 U.S.C. 1203 Against Dieterle, Pagel and Reich

1. Hansen realleges and incorporates herein by reference each and every foregoing paragraph of this Amended Complaint as if set forth in full.

Each of the above named individuals is guilty of kidnapping under N.D.C.C. 12.1-18.

- 2. 12.1-18.01, 1. A person is guilty of kidnapping if he abducts another or, having abducted another, continues to restrain him with intent to do the following:
- a. Hold him for ransom or reward;
- b. Use him as a shield or hostage;

Hold him in a condition of involuntary servitude; Terrorize him or a third person;

- e. Commit a felony or attempt to commit a felony; or
- f. Interfere with the performance of any governmental or political function.
- 2. Kidnapping is a class A felony unless the actor voluntarily releases the victim alive and in a safe place prior to the trial, in which it is a class B felony.
- 3. Restrains another with intent to hold him in a condition of involuntary servitude. Under N.D.C.C.12.1-18-04(1)(2).
- 18 U.S.C. 1203, Hostage Taking, is defined as the seizing or detention of an individual in order to compel a third person or governmental organization to take some action.
- 4. Dieterle, Pagel and Reich knowingly worked in conjunction in kidnapping and even committing conspiracy to kidnap. Dieterle and Pagel worked in concert in the creation and filing of yet another of their fraudulent malicious ex parte motions. There was no probable cause, no warrant established, because none existed to cover their malicious intent. Reich worked with the pair in issuing a fraudulent judgment of which he allowed and even advocated to the taking of Hansen's daughter under the threat of force and coercion, and all was done without proper service and without due process, and thus is in violation of this chapter.

- 5. Dieterle has violated the above N.D.C.C., specifically obtaining Hansen's daughter by a knowingly fraudulent judgment, and continuing to restrain the daughter against her will for two full years as of September 4, 2017, thus holding her hostage to terrorize her and Hansen.
- 6. As such, it is proper to hold the defendants accountable for the kidnapping, hostage taking and unlawful concealment of a minor, due to their intentional collusion, deceit and fraud which created the unlawful taking of this child by threat of force.
- 7. Hansen is further entitled to, and should be awarded preliminary and permanent injunction that enjoins Defendants, their assignees and anyone else acting in concert with themfrom commencing, prosecuting, or advancing in any way- directly or indirectly- from any attempt to recognize or enforce the Dieterle litigation in any court, tribunal, or administrative agency in any jurisdiction, in the United States or abroad, including any attempt to attach or seize any of Hansen's assets, whether pre-judgment or otherwise, until this Court determines the merits and enters judgment on Hansen's claims against Defendants in this action.

## FIFTH CLAIM FOR RELIEF Trespass to Chattels

### Against All Defendants

- 1. Hansen realleges and incorporates herein by reference each and every foregoing paragraph of this Amended Complaint as if set forth in full.
- 2. As set forth above, the RICO Defendants have engaged in a pattern of extortion, collusion, wrongdoing, and deceit with intent to interfere with Hansen's property, and the RICO Defendants have benefited and will continue to benefit from the RICO Defendants' criminal scheme through a fraudulent judgment. Through these actions, and by prosecuting a fraudulent

lawsuit, manufacturing false evidence, tampering with testimony, disseminating misleading statements to courts, the public and other officials whether yet known or unknown, and otherwise engaging in the pressure campaign described in the foregoing paragraphs of this Amended Complaint, Defendants have intentionally, and without justification or consent, interfered and intermeddled with Hansen's use and enjoyment of her funds that were intended for Hansen's business purposes and of her business reputation and goodwill.

- 3. Hansen has been harmed and the use of her assets and her property has been interfered with and disturbed when her property, resources and funds were necessarily redirected from their intended use to defend against Defendant Dieterle's and Pagel's fraudulent litigation and misleading campaign against Hansen... For example, Hansen has been forced by the RICO Defendants' intentional and wrongful conduct to expend funds and resources defending against fraudulent submissions in the sham litigation, uncovering the RICO Defendants' fraud through discovery(discovery with which Dieterle and Pagel have continually interfered with, as described herein), responding to false and misleading reports in the Courts then placed online further causing harm to Hansen which have been indicted by the RICO Defendants Dieterle and Pagel, and maintaining an ongoing effort to provide accurate information about the Local District Court case and other aspects of the RICO Defendants fraud to the public.
- 4. Hansen also has been harmed in that Defendant's conduct has damaged Hansen's reputation, thus interfering with Hansen's interest in the public goodwill toward it. Public awareness of and positive associations with Hansen's name and her business brand name, are among Hansen's most valuable assets, and Hansen has invested substantial resources into those brand names. The RICO Defendants have intentionally sought to reduce the value of those assets as part of their extortionate scheme. Dieterle and Pagel together have expressly proven one of

their key elements of their collective strategy is to impose upon Hansen a sullied reputation in the public.

- 5. The harms suffered by Hansen are the direct, proximate, and reasonably foreseeable results of the Defendants' acts of intentional interference with Hansen's funds and goodwill, which has caused significant pecuniary, reputational and other damages. These injuries include significant damage to Hansen's reputation and attorney's fees and costs to defend herself against previously released motions, affidavits and void judgments in related litigation to attempt to enforce the production of a lawful judgment.
- 6. Defendants have engaged in the malicious, willful and fraudulent commission of wrongful acts and, because of the reprehensible and outrageous nature of these acts, Hansen in entitled to, and should be awarded compensatory and punitive damages against each of the Defendants to be established at trial.
- 7. Hansen is further entitled to, and should be awarded, a preliminary and permanent injunction that enjoins Defendants, their assignees and anyone else acting in concert with themfrom commencing, prosecuting, or advancing in any way- directly or indirectly- from any attempt to recognize or enforce the Dieterle litigation in any court, tribunal, or administrative agency in any jurisdiction, in the United States or abroad, including any attempt to attach or seize any of Hansen's assets, whether pre-judgment or otherwise, until this Court determines the merits and enters judgment on Hansen's claims against Defendants in this action.

WHEREFORE, Hansen prays for judgment as set forth below.

#### SIXTH CLAIM FOR RELIEF

### Unjust Enrichment Against All Defendants

- 1. Hansen realleges and incorporates herein by reference each and every foregoing paragraph of this Amended Complaint as if set forth in full.
- 2. Defendants Dieterle and Pagel, Pagel Weikum specifically, sought out to obtain thousands of dollars from Hansen through fraudulent Judgments in the Dieterle litigation.

  Defendants have been and will continue to be unjustly enriched by benefits obtained due to the judgment itself.
- 3. Any property that Defendants Dieterle, Pagel, Pagel Weikum have obtained from Hansen haven been acquired as a result of these named Defendants' tortious, illegal and fraudulent conduct, as set forth herein, including the prosecution of the sham litigation itself.

Further, these injuries to Hansen were a direct, proximate and reasonably foreseeable result of the violation of 18 U.S.C. § 1962. Hansen and her children are the ultimate victims of the RICO Defendants' unlawful Enterprise. Hansen has been and will continue to be injured in her business and has lost her rightly property due to the acts of the RICO Defendants, in an amount to be determined at trial.

- 4. Pursuant to 18 U.S.C. § 1964(c), Hansen is entitled to recover treble damages plus costs and attorney's fees from the RICO Defendant, an amount to be established at trial.
- 5. Principles of equity and good conscience mandate that this Court provide for disgorgement against Defendants for their years of reaping hundreds of thousands of dollars from Hansen and any benefits arising out of the fraudulent litigation by, among other things,

issuing a preliminary and permanent injunction against Defendants that enjoined Defendants, their assignees, and anyone else acting in concert with them- including the Law firm, Pagel Weikum- from commencing, prosecuting, or advancing in any way- directly or indirectly- any attempt to recognize or enforce the Dieterle judgment in any court, tribunal, or administrative agency in any jurisdiction, in the United States or abroad, including any attempt to attach or seize any of Hansen's assets, whether pre-judgment or otherwise, until this Court determines the merits and enters judgment on Hansen's claims against Defendants in this action.

WHEREFORE, Hansen prays for judgment as set forth below.

## SEVENTH CLAIM FOR RELIEF Civil Conspiracy Against All Defendants

- 1. Hansen realleges and incorporates herein by reference each and every foregoing paragraph of this Amended Complaint as if set forth in full.
- 2. As set forth above, Defendants have committed tortious interference with business, trespass to chattels, unjust enrichment, retaliation, witness tampering, kidnapping, unlawful search and seizure of a child, coercion and force.
- 3. Defendants agreed to participate in a common scheme against Hansen. Defendants intentionally participated in the furtherance of a plan or purpose to obtain property and even a life from Hansen. In furtherance of this plan or purpose, Defendants committed overt and unlawful acts, including acts of racketeering as alleged herein.
- 4. As a direct and proximate result of Defendants' conspiracy, the overt acts committed in furtherance of that conspiracy, and the torts committed against Hansen, Hansen has been

damaged in her business and property, and further damage to Hansen's business is threatened and imminent if Hansen is not fully and quickly receive just and proper compensation for the wrongful acts committed against her, also there's now no hope of Hansen ever re-acquiring her property- the ranch and other material assets and personal items that were stolen from her by the Defendants acts.

- 5. This conspiracy involved multiple violations of violations of, but not limited to, the First, Fourth, Fifth, Sixth, Eighth, Fourteenth Amendments, as well as violations of 18 U.S.C. 241,242 and 245.
- 6. Further, these injuries to Hansen were a direct, proximate and reasonably foreseeable result of the violation of 18 U.S.C. § 1962. Hansen and her children are the ultimate victims of the RICO Defendants' unlawful Enterprise. Hansen has been and will continue to be injured in her business and has lost her rightly property due to the acts of the RICO Defendants, in an amount to be determined at trial.
- 7. Pursuant to 18 U.S.C. § 1964(c), Hansen is entitled to recover treble damages plus costs and attorney's fees from the RICO Defendants.
- 8. Defendants have engaged in the malicious, willful and fraudulent commission of wrongful acts and because of the reprehensible and outrageous nature of these acts, Hansen is entitled to, and should be awarded, punitive damages against each of the Defendants.
- 9. Hansen is further entitled to, and should be awarded preliminary and permanent injunction that enjoins Defendants, their assignees and anyone else acting in concert with themfrom commencing, prosecuting, or advancing in any way- directly or indirectly- from any attempt to recognize or enforce the Dieterle litigation in any court, tribunal, or administrative

agency in any jurisdiction, in the United States or abroad, including any attempt to attach or seize any of Hansen's assets, whether pre-judgment or otherwise, until this Court determines the merits and enters judgment on Hansen's claims against Defendants in this action.

WHEREFORE, Hansen prays for judgment as set forth below.

#### **EIGHTH CLAIM FOR RELIEF**

Violations of North Dakota Judicial Conduct Against All Defendants Minus Pagel and Dieterle.

- 1. Hansen realleges and incorporates herein by reference each and every foregoing paragraph of this Amended Complaint as if set forth in full.
- 2. North Dakota Law provides, in pertinent part, as follows: As set forth above, all Defendants, engaged in an intentional pattern of collusion, wrongdoing, and deceit with the intent to deceive both Hansen and the State District Court and Supreme Court of the State of North Dakota.
- 3. Pagel, the Law Offices of Pagel Weikum actively participated in the preparation and filing of multiple court submissions to the North Dakota South Central Judicial District Court and the North Dakota Supreme Court, which included false and misleading statements about the Dieterle litigation. Defendants Pagel and the Law Offices of Pagel Weikum caused these misstatements to be filed with the intent of deceiving these Courts and Hansen.
- 4. Violations by Jorgensen, Reich, Geiger, Hagerty, VandeWalle, Crothers, Sandstrom, Fair-McEvers, Ronning-Kapsner include but are not limited to; Canon 1, Canon 2, and Canon 3.

Each of these specifically mentioned defendants have exposed themselves to personal liability for their conduct under 32-12.1-15(2), N.D.C.C., because their conduct was not within the scope of their employment under 26.1-21-10.0(1)(b), N.D.C.C.

- 5. Pagel and the Law Offices of Pagel Weikum tampered with the testimony of Hansen in furtherance of the Enterprise's scheme and other testimonies, such as Dr. Ascano and Ms. Autumn Ascano and Mr. Hulm. As a result of the deceitful and fraudulent conduct of Pagel, the Law Offices of Pagel Weikum, as described herein, Hansen has been injured in an amount to be established at trial.
- 6. By reason of the foregoing, Hansen is entitled to compensatory and punitive damages against each of the above named Defendants, an amount to be established at trial.
- 7. Hansen is further entitled to, and should be awarded preliminary and permanent injunction that enjoins Defendants, their assignees and anyone else acting in concert with themfrom commencing, prosecuting, or advancing in any way- directly or indirectly- from any attempt to recognize or enforce the Dieterle litigation in any court, tribunal, or administrative agency in any jurisdiction, in the United States or abroad, including any attempt to attach or seize any of Hansen's assets, whether pre-judgment or otherwise, until this Court determines the merits and enters judgment on Hansen's claims against Defendants in this action.

WHEREFORE, Hansen prays for judgment as set forth below.

### NINETH CLAIM FOR RELIEF

## Request for Declaratory Judgment That the Judgment by the South Central Judicial Court is unenforceable and Non-Recognizable

- 1. Hansen realleges and incorporates herein by reference each and every foregoing paragraph of this Amended Complaint as if set forth in full.
- 2. Hansen is entitled to a declaratory judgment that the judgment from the Dieterle case violates the Fourteenth Amendment and is unenforceable and non-recognizable pursuant to the Declaratory judgment Act, 28 U.S.C. § 2201(a), and any use of such court orders must cease immediately.
- 3. A declaratory judgment will not improperly increase friction between legal systems or encroach on the proper court because no court has a right to impose fraudulent judgments such as the judgments in the Dieterle case. And an injunction against the Defendants named in this claim and all those acting in concert with them would not bind or affect the lower courts in any way, does not interfere with any proceedings in any other Courts, *inter alia*, no recognition or enforcement proceedings are currently pending in any other Courts.
- 4. By this claim, Hansen seeks a declaratory judgment that the Dieterle judgments after October 19, 2011 are unenforceable and non-recognizable, including but not limited to under the United States Constitution, federal common law, North Dakota Common law principles of comity, etc, on, among others, grounds of fraud, failure to afford procedures compatible with due process, lack of impartial tribunals, lack of personal jurisdiction, contravention of public policy, that the judgment conflicts with proper due process of law, and that the judgment is an unenforceable penalty.

- 5. By reason of the fraudulent acts and fundamentally unfair proceedings described in this Amended Complaint that have given rise to the Dieterle judgment, which is an unenforceable, unlawful judgment. The actions of the RICO Defendants have damaged and are continuing to cause damage to Hansen.
- 6. Hansen has no adequate remedy at law. A declaratory action is necessary and useful in resolving and disposing of the question of whether the fraudulent Dieterle judgments is enforceable and recognizable, and in the best and most effective remedy for finalizing the controversy between the parties as to this issue and for relieving Hansen from the expensive and damaging enforcement and recognition of the fraudulent judgment.
- 7. Hansen is further entitled to, and should be awarded a preliminary and permanent injunction against Defendants that enjoined Defendants, their assignees, and anyone else acting in concert with them- including the Law firm, Pagel Weikum- from commencing, prosecuting, or advancing in any way- directly or indirectly- any attempt to recognize or enforce the Dieterle judgment in any court, tribunal, or administrative agency in any jurisdiction, in the United States or abroad, including any attempt to attach or seize any of Hansen's assets, whether pre-judgment or otherwise, until this Court determines the merits and enters judgment on Hansen's claims against Defendants in this action.

# TENTH CLAIM FOR RELIEF Fraudulent Conversion 18 U.S.C. 641 Against All Defendants

1. Hansen realleges and incorporates herein by reference each and every foregoing paragraph of this Amended Complaint as if set forth in full.

- 2. As set forth above, Defendants have committed tortious interference with business, trespass to land, and unjust enrichment in violation of 18 U.S.C. 641.
- 3. Defendants agreed to participate in a common scheme against Hansen. Defendants intentionally participated in the furtherance of a plan or purpose to obtain property and even a life from Hansen. In furtherance of this plan or purpose, Defendants committed overt and unlawful acts, including acts of racketeering as alleged herein.
- 4. As a direct and proximate result of Defendants' conspiracy, the overt acts committed in furtherance of that conspiracy, and the torts committed against Hansen, Hansen has been damaged in her business and property, and further damage to Hansen's business is threatened and imminent, also there's now no hope of Hansen ever re-acquiring her property- the ranch and other material assets and personal items that were stolen from her by the Defendants acts.
- 5. Hansen is entitled to compensatory and punitive damages against each of the Defendants for an amount to be established at trial.
- 6. Defendants have engaged in the malicious, willful and fraudulent commission of wrongful acts and because of the reprehensible and outrageous nature of these acts, Hansen is entitled to, and should be awarded, punitive damages against each of the Defendants.

## ELEVENTH CLAIM FOR RELIEF Intentional Infliction of Emotional Distress Against All Defendants

- 1. Hansen realleges and incorporates herein by reference each and every foregoing paragraph of this Amended Complaint as if set forth in full.
- 2. The above stated Defendants, namely, Dieterle, Pagel, Jorgensen and Reich have acted intentionally and/or recklessly; have used extreme and/or outrageous conduct; with their conduct

being cause of Hansen's severe emotional distress. Intentionally causing reckless endangerment of Hansen's health, which has resulted in severe damages by this pattern of fraud and extortion, and conspiracy to commit the fraud and extortion, among the named defendants.

- 3. Defendants were acting under color of law at all times relevant to this complaint.

  Plaintiff suffered
- 4. The above named Defendants, Dietlere, Pagel and Reich acted in conspiracy in committing intentional infliction of extreme emotional distress, anxiety, and trauma form the conduct of the Defendants, as alleged herein.
- 5. Defendant's behavior was not just mean-spirited; rather their conduct a calculated plan to cause Hansen extreme emotional harm. The motive behind Defendants conduct was retaliation for Hansen exposing the fraud, deceit and intentional misrepresentations by the trio against Hansen. The acts taken together were so outrageous as to be utterly intolerable in a civilized community. Hansen's Amended Complaint has stated a cause of action against Defendants for the intentional infliction of emotional distress.
- 6. As a result of the deceitful and fraudulent conduct of Dieterle, Pagel, the Law Offices of Pagel Weikum, Reich, Geiger, and each of the above named Defendants, as described herein, Hansen has been injured in an amount to be established at trial.
- 7. By reason of the foregoing, Hansen is entitled to monetary damages against Dieterle, Pagel, The Law Offices of Pagel Weikum, Jorgensen, Reich, Geiger, Hagerty, VandeWalle, Crothers, Sandstrom, Fair-McEvers, Ronning Kapsner, and the clerks listed, Mindt, Schell, Holewa, Myers, Wonderlich, Hulm, Miller and treble damages, and reasonable attorneys' fees pursuant to north Dakota and federal law.

- 8. Defendants have engaged in the malicious, willful and fraudulent commission of wrongful acts and because of the reprehensible and outrageous nature of these acts, Hansen is entitled to, and should be awarded, punitive damages against each of the Defendants.
- 9. Due to the severe misconduct of the named individual defendants who worked in collusion of each other, Hansen is entitled to compensatory and punitive damages against each of the defendants, for an amount to be established at trial.
- 10. Hansen is further entitled to, and should be awarded a preliminary and permanent injunction against Defendants that enjoined Defendants, their assignees, and anyone else acting in concert with them- including the Law firm, Pagel Weikum- from commencing, prosecuting, or advancing in any way- directly or indirectly- any attempt to recognize or enforce the Dieterle judgment in any court, tribunal, or administrative agency in any jurisdiction, in the United States or abroad, including any attempt to attach or seize any of Hansen's assets, whether pre-judgment or otherwise, until this Court determines the merits and enters judgment on Hansen's claims against Defendants in this action.

# TWELFTH CLAIM FOR RELIEF Violations of 42 USC 1981 & § 1982, 42 USC § 1983 and 42 U.S.C. § 1985 Against All Defendants

- 1. Hansen realleges and incorporates herein by reference each and every foregoing paragraph of this Amended Complaint as if set forth in full.
- 2. "Ordinarily, due process of law requires [notice and] an opportunity for some kind of hearing prior to the deprivation of a significant property interest." 42 U.S.C. § 1981 Equal rights under the law Jorgensen, Reich, Geiger, Hagerty, VandeWalle, Sandstrom, Crothers, Fair-McEvers, Ronning-Kapsner and Pagel all violated this right by their above stated activities,

furthermore, all acted in conspiracy of one another to violate this rights of Hansen. "The Court is to protect against any encroachment of Constitutionally secured liberties." Boyd v. U.S., 116 U.S. 616. These same individuals also violated 42 U.S.C. § 1982 and acted in conspiracy to do so, as is described more fully in the paragraphs above. These individuals violated and deprived Hansen of this right guaranteed to her as is more fully described above. Each of these individuals violation is liable to Hansen not only under R.I.C.O. but also under 42 U.S.C. § 1983, Civil action for deprivation of rights. Furthermore these individuals violated 42 U.S.C. § 1985(2) & (3).

Hansen, injured party, sues each and all defendants in both their individual and official capacities.

- 3. 42 U.S.C. § 1985(2) a cause of action for obstruction of justice, intimidating party, witness or juror, where "two or more persons conspire for the purpose of impeding, hindering, obstructing, or defeating, in any manner, the due course of justice in any State or Territory, with the intent to deny to any citizen the equal protection of the laws." This is described more fully in the paragraphs above.
- 4. And 42 U.S.C. § 1985(3) Depriving persons of right or privileges. Hansen has described more fully in paragraphs above.
- 5. And 42 U.S.C. § 1986 violations of- Action for neglect to prevent, these same individuals are guilty of such wrongful neglect.
- 6. Additional violations include but are not limited to; Title 18 U.S.C. § 1505, Title 18 U.S.C. § 1512, Title 18 U.S.C. § 1018, 18 U.S.C. § 1621, §1622, §1623.

- 7. Jorgensen, Reich, Geiger, and each additional oath sworn individual is in violation of 18 U.S.C. 241 and U.S.C. 242 & 245 as well as violations of Title 42 U.S.C. 14141 as is Pagel as an officer of the court.
- 8. Due to the above stated violations against Hansen, Hansen is entitled to recover proper compensatory and punitive damages plus costs and attorney's fees from each of the RICO Defendants, amounts to be established at trial.
- 9. Hansen is further entitled to, and should be awarded a preliminary and permanent injunction against Defendants that enjoined Defendants, their assignees, and anyone else acting in concert with them- including the Law firm, Pagel Weikum- from commencing, prosecuting, or advancing in any way- directly or indirectly- any attempt to recognize or enforce the Dieterle judgment in any court, tribunal, or administrative agency in any jurisdiction, in the United States or abroad, including any attempt to attach or seize any of Hansen's assets, whether pre-judgment or otherwise, until this Court determines the merits and enters judgment on Hansen's claims against Defendants in this action.

### THIRTEENTH CLAIM FOR RELIEF

Breaches of Fiduciary Duty Arising under State, Federal or Common Law, Violations of Attorney deceit statutes and judicial misconduct Against All Defendant's minus Dieterle

- 1. Hansen realleges and incorporates herein by reference each and every foregoing paragraph of this Amended Complaint as if set forth in full.
- 2. As directors and/or officers of the court, each of the Defendants, minus perhaps, Dieterle, owe fiduciary duties of care, loyalty and good faith to Hansen. Defendant's fiduciary duties

include obligations to exercise good judgment, to act prudently, to discharge their actions in good faith and to act in the best interests of the constitution, to put the interests and safety of the public and all people above their own.

The above stated individuals have done and conspired to do numerous grossly negligent acts, malfeasance in office, violations of 18 U.S.C. § 3333 and/ or willful wanton misconduct acts against Hansen further violating N.D.C.C. 26.1-21-10.1(1)(b). Due to these facts, each individual is personally liable under federal law for violations and by N.D.C.C. according to 32-12.1-15(2).

- 3. Jorgensen and Reich specifically, have committed a multitude of intentional violations of their fiduciary duty by persistently making discourteous and disparaging remarks so as to discredit Hansen or create the impression of each one of them individually and jointly creating the impression of each allying themselves with the prosecution. By belaboring points of evidence that were clearly adverse to [Hansen], the trial courts took on the role of prosecutor rather than that of impartial judge. These instances as are stated at length above are extreme instances of impropriety and are so egregious as to require reversal of judgments against Hansen.
- 4. Defendant's Jorgensen and Reich namely, have breached their fiduciary duties by abandoning their roles as impartial trier of facts and deprived Hansen of her rights to a fair tribunal. Further breaches of fiduciary duties took place when Jorgensen made a direct expression of his opinion of Hansen on or about June 19 or 20 of 2012, including braches made by his 40 disparaging and discourteous utterances, which included numerous statements of errors within these utterances against Hansen.
- 5. Jorgensen and Reich as is described more fully above used routine and multiple coercive and destructive comments against Hansen, in breaches of their fiduciary duties. Additional breach of fiduciary duty by Reich on March 5, 2015, wherein he used force, coercion and

intimidation upon Hansen, and breached his fiduciary duty by these acts as well as by doing such to force proceedings against Hansen in the absence of counsel for Hansen.

- 6. Defendant's breached their fiduciary duty of care and their duty to uphold the constitution, among other things, routinely mismanaging their positions and failing to abide to their oaths.
- 7. Defendants breached their duties of loyalty, good faith, among other things, intentionally and repetitively violating federal and state laws in an attempt to cause egregious harms to Hansen and have entrenched themselves with co-conspirators at the expense of Hansen. Hansen's attorney stated in an appeal hearing regarding the obvious bias of Jorgensen against Hansen requiring disqualifying Jorgensen upon remand, and yet the Supreme Court Judges, individuals, namely VandeWalle, Crothers, Sandstrom, Fair-McEvers, Ronning-Kapsner committed breaches of their fiduciary duties by ignoring this truthful information and failing to take it seriously. Other breaches of fiduciary duties by these named individuals including Jorgensen and Reich is abuse of process and violations of, but not limited to, under color of law such as 18 U.S.C. § 241, 242 and 245. Removal from case is warranted where original judge indicates an animus inconsistent with judicial objectivity.
- 8. Hansen had brought forth honest valid motions to disqualify Reich, for a change of Venue and motions exposing the fraud being committed by Dieterle and Pagel and Reich committed several breaches of fiduciary duty by blatantly ignoring this information. He also committed acts of breach of fiduciary duty by intentionally blocking, impeding and interfering with Hansen's lawsuit against him, by filing an unlawful order to block her from a lawful filing, wherein he was named as a Defendant in the case.

- 9. Vandewalle, Crothers, Sandstrom, Fair-McEvers and Ronning-Kapsner also committed routine breaches of fiduciary duty and of judicial misconduct by all of the above actions including flatly denying Hansen her access to the court and not properly overseeing their lower court judges, this is an extreme abuse of process and thus, breaches of duty.
- 10. Each and every judge named above acted in their individual capacity, became embroiled, surrendered the role of impartial fact finder/ decision maker and joined the fray. This entanglement and embroilment of these individuals is further breaches of fiduciary duty.

Each of these instances is stated more fully above.

- 11. Pagel the Law Offices of Pagel Weikum, actively participated in the preparation and filing of multiple court submissions to the North Dakota South Central Judicial District Court and the North Dakota Supreme Court, which included false and misleading statements about the Dieterle litigation. Defendants Pagel and the Law Offices of Pagel Weikum caused these misstatements to be filed with the intent of deceiving these Courts and Hansen. Pagel and the Law Offices of Pagel Weikum tampered, interfered with the testimony of Hansen in furtherance of the Enterprise's scheme and other testimonies, such as Dr. Ascano and Ms. Autumn Ascano and Mr. Hulm.
- 12. Pagel has committed acts of breaches of fiduciary duty by his continued failure to report said breaches and misconduct. It is an attorney's ethical responsibility to report misconduct. Because of Pagels' misconduct, he has violated an extreme multitude of attorney deceit statutes and the Model Rules of Prof'l Conduct, as is more fully stated above. Pagel has filed a plethora of frivolous claims, made known misrepresentations in support of motions and made intentional material misrepresentations. He has submitted false statements and lied about evidence, including submitting deceptive or fraudulent supporting documents in connection with the filing

of motions. Deceptive behavior during the discovery process and material misrepresentations to a tribunal to third parties and knowingly presenting false evidence.

- 13. And providing deceptive responses to interrogatories and other discovery. Pagel has violated Title 28 U.S.C. § 1927. Rules according to the ABA Model Rules of Professional Conduct as well as Federal Rules. Violations of Rules 3.1, 3.3, 3.4, 4.1, 4.4, 8.3, 8.4 F.R.C.P. 5, 11(b) 30. Pagel as is more fully described above, have concealed exhibits, tampered with witness's and testimony of such. Presenting or claiming to have false evidence and providing perjured testimony and acted as a witness in matters. Also has committed omissions of material facts.
- 14. Hansen, her family and the public interests have been damaged by the Defendants' breach of their fiduciary duties.
- 15. As a result of the deceitful and fraudulent conduct of each of the above stated

  Defendants, including Pagel, the Law Offices of Pagel Weikum, as described herein, Hansen has
  been injured in an amount to be established at trial.
- 16. By reason of the foregoing, Hansen is entitled to monetary damages against each of the above named defendants including Pagel, The Law Offices of Pagel Weikum, damages, and reasonable attorneys' fees pursuant to North Dakota and federal attorney deceit statutes as well as The Model Rules of Professional Conduct and any other damages as the court sees fit.

WHEREFORE, Hansen prays for judgment as set forth below.

### FOURTEENTH CLAIM FOR RELIEF

### Aiding and abetting Against All Defendants

- 1. Hansen realleges and incorporates herein by reference each and every foregoing paragraph of this Amended Complaint as if set forth in full.
- 2. As described above, Defendants engaged in a pattern of oppressions intended to restrict and later terminate Hansen's parental rights, her rights to own property and her civil rights, to enrich themselves at the expense of Hansen.
- 3. As described above, Defendants knew that the other Defendants were engaged in unlawful conduct intended to restrict Hansen's rights to contest o defend the scheme put into place by various Defendants for self-enrichment at the expense of Hansen.
- 4. As described above, Defendants that numerous threats, use of coercion and force were issued against Hansen.
- As described above, Defendants knew that threats of force, coercion and economic harm directed at Hansen were likely to deprive Hansen of her rights, despite this knowledge, Defendants persisted in their conduct, resulting in extreme abuses causing monumental harm to Hansen.
- 6. As described above, all Defendants cooperated with the unlawful activities described herein or failed to warn appropriate persons and governmental officials of the unlawful conduct used to divert assets and obtain total control of Hansen.
- 7. Hansen has been harmed by these individuals and is entitled to proper compensatory and punitive compensation for an amount to be determined at trial.
- 8. As a direct and proximate result of Defendants' aiding and abetting one another, Hansen has been damaged in an amount to be proven at trial. Hansen is also entitled to recover

punitive damages in an amount sufficient to punish Defendants and to deter further conduct of this type.

### PRAYER FOR RELIEF

On each individual Claim for relief for Claims One through 8; Ten through Fourteen...

- 1. For general damages according to proof at trial, trebled according to statute, 18 U.S.C. §1964(c);
- 2. For general damages according to proof at trial, trebled according to statute, 18 U.S.C. § 1964(d);
- 3. For pre-judgment interest according to law; and
- 4. For Hansen's reasonable attorney's fees and costs according to law;
- 5. For compensatory damages, as shown, according to proof;
- 6. For, but not limited to a temporary and permanent injunctive relief; that bars Defendants, their assignees and anyone else acting in concert with them-- including the Law firm, Pagel Weikum, Wayne Stenhejem and his assignees- from commencing, prosecuting, or advancing in any way- directly or indirectly- including any attempt to attach or seize any of Hansen's assets, whether pre-judgment or otherwise, until this Court determines the merits and enters judgment on Hansen's claims against Defendants in this action
- 7. For disgorgement of monies improperly obtained:
- 8. For costs of suit;
- 9. For such other and further relief as this Court may deem proper.
- 5. On the Nineth Claim for Relief:

Hansen realleges and incorporates herein by reference each and every forgoing paragraph of this Amended Complaint as is set forth in full.

- 6. Hansen is entitled to declaratory judgment from the Memorandum Decision issued on or about July 17, 2012 and its subsequent judgment issued on or about August 11, 2012, is in violation of the fourteenth amendment to the United States Constitution and any use of such court orders must cease immediately. Said orders by Jorgensen and Reich are non-recognizable and unenforceable for each and every one of the reasons set forth herein; as well as all subsequent orders due to the same reasons as stated above pursuant to the Declaratory judgment Act, 28 U.S.C. § 2201.
- 7. In short, due to the above malicious and fraudulent acts of the defendants, as judgments created after October 19, 2011 are non-recognizable and unenforceable, included but not limited to under the Constitution, federal common law, North Dakota Common law principles of comity, etc, on among others, grounds of fraud, failure to afford procedures compatible with due process lack of impartial tribunals, lack of personal jurisdiction, contravention of public police, that the judgment grounded upon fraud and deceit conflicts with proper due process of law, and that the judgments subsequent to October 19, 2011 are unenforceable penalties and in acts of cruel and unusual punishment.
- 8. For, but not limited to a preliminary and permanent injunctive relief, that bars

  Defendants, their assignees and anyone else acting in concert with them-- including the

  Law firm, Pagel Weikum, Wayne Stenhejem and his assignees- from commencing,

  prosecuting, or advancing in any way- directly or indirectly- any attempt to recognize or
  enforce the Dieterle judgment in any court, tribunal, or administrative agency.
- Enter a declaration that Plaintiff's Fourteenth Amendment rights and of minor child,
   B.L.D's Fourth Amendment rights were violated.

- 9. For equitable relief as appropriate pursuant to applicable law, including but not limited to all Causes of Action:
- 10. For such other legal and equitable relief as the Court may deem Hansen is entitled to receive.

### **Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation, (2) is supported by existing law or by a non-frivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of Signing

Autograph of Plaintiff/ Injured Party

Printed Name of Plaintiff/ Injured Party

PO Box 84

Cowdrey, Colorado. 80434

701-720-9021

Using a notary on this document constitutes an adhesion in Equity. It does not alter my status in any manner. The purpose for the notary is verification and identification only not for entrance into ANY Foreign Jurisdiction.

I declare under penalty of perjury that the statements I have made in this Notice for Final Judgment are true and correct to the best of my knowledge.

Executor of this Instrument

Orinted Name Angila Hansin	Date Chagast 21, 2017
Autographi Auglic Hansin  Address Fil BCX 54  State Cileracte	· · · · · · · · · · · · · · · · · · ·
NOTARY  Sign in Red Ink only	
Before me, Cynthia K Cilcan, the subscriber, personally appeared Urigina (Vennice).	
To me known to be the Living Soul described in and who executed the foregoing instrument and sworn before me that they executed the same as their own free will act and deed. State of Colorado, County of Jackson.	
Witness Autograph Cinthuc 45 (Elecution)	
Date $\frac{\sqrt{2}}{\sqrt{2}} \frac{\sqrt{2}}{\sqrt{2}} \frac{1}{\sqrt{2}} \frac{1}{\sqrt{2}$	
	Seal:

CYNTHIA K. ALCORN NOTARY PUBLIC STATE OF COLORADO NOTARY ID #20164018889 My Commission Expires May 19, 2020