

1 are fraudulent because they have no personal knowledge of whatever they are stating, and  
2 furthermore it is mostly fantasy designed to fit their racial prejudices against, Dolphin, Negroes,  
3 and negroid nations ("African").

4 183. Gollin, Schwartz, and Contreras, the Illinois and the ODA, each and all, being public  
5 employees, officials and agencies, have the responsibility to verify, with due diligence, each and  
6 every statement they make concerning any citizen of the United States of America.

7  
8 **BACKGROUND OF SLSOM**

9 184. The online curriculum created by Dolphin for SLSOM was the first of its kind in the  
10 world. The online curriculum mirrored the curriculum offered in Liberia on the SLSOM campus.  
11 It was created to supplement the medical students study. The curriculum was and is based on the  
12 exam topics listed in the USMLE Annual Step 1 Bulletin for basic sciences, the first two years of  
13 medical school. See Exhibit "36".

14 185. No student has ever graduated from St. Luke School of Medicine using its online  
15 curriculum, alone. It is too difficult and too extensive. In fact, of SLSOM's 36 graduates, only  
16 two has ever used its online curriculum. All other 34 graduates are completely unfamiliar with  
17 it. They are transfer students to SLSOM from other accredited medical schools, from various  
18 parts of the world. Therefore, they only had their last two years of full-time training at  
19 accredited hospitals and clinics to complete.

20 186. SLSOM records each and every examination score in the medical student's record, which  
21 is recorded in the student's transcript, which is then averaged for each course for the course final  
22 grade. A SLSOM medical student is not allowed to fail any examination in any course. A  
23 student has four chances to pass any examination, otherwise that medical student must retake the  
24 entire course and cannot progress until that course is passed. The transcripts of all SLSOM  
25 students and graduates will clearly demonstrate SLSOM's diligent record keeping.

26 187. Accurate financial records were kept for each and every student enrolled in SLSOM. At  
27 no time were hundreds of Indian or Liberian students ever enrolled at SLSOM. Liberian  
28 students were not even charged tuition at SLSOM. However, the Liberian campuses were

1 destroyed from civil war on two occasions and closed as a result of governmental extortion,  
2 interference and misconduct from 2005 until the present day.

3 188. During the first eight years of SLSOM's existence, 1998 through 2006, SLSOM  
4 graduated 36 doctors. This represents an average of 4.5 doctors a year. This does not fit the  
5 definition of a "diploma mill".

6 189. It is impossible for a medical student to graduate with a Doctorate of Medicine degree  
7 with courses completed online. Even if a student completes SLSOM's online curriculum for  
8 basic sciences, which only 6 medical students did during SLSOM's operation in Liberia until  
9 2006, the medical student would have to complete at least 80 weeks of clinical rotations at an  
10 accredited hospital to graduate, aside from other requirements needed for graduation.

11 190. The best evaluation of the rigor and effectiveness of St. Luke School of Medicine's online  
12 and clinical science curriculum is the pass rate for national and international medical licensing  
13 examinations. SLSOM's worldwide medical licensing examination pass rate of 88% is  
14 exceptional. If the scores from medical students forced to transfer to other medical schools due  
15 to the IMED removal and subsequent fallout were included in this calculation, SLSOM's  
16 worldwide medical licensing examination pass rate would rise to 96%.

17 191. Because there is no central foreign medical school accrediting body, a foreign medical  
18 school's listing on the IMED essentially acts as a de-facto accreditation. The hallmark used by  
19 ECFMG in assessing foreign medical programs is student passage rates on the USMLE.

20 192. ECFMG and FAIMER removed SLSOM from IMED, surprisingly, among other things,  
21 without taking note of SLSOM students high USMLE pass rate. This meant that SLSOM  
22 graduates and degrees are not recognized worldwide. World Health Organization's Worldwide  
23 Directory of Medical Schools will no longer be updated.  
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**IV. CAUSES OF ACTION**

**1<sup>st</sup> Cause of Action - CONSTITUTIONAL VIOLATIONS UNDER 42 U.S.C. § 1983 (First Amendment - Freedom of Speech, the Right to Peaceably Assemble and to Petition the Government for Redress)**

192 Plaintiffs repeat and re-allege each and every preceding allegation in paragraphs 1-191 as if fully set forth herein.

193 Defendants Gollin, Schwartz, the Illinois, Contreras and the ODA intentionally and maliciously violated plaintiff's First Amendment rights by publishing defamatory, libelous, untrue statements, in newsprint and the internet, that caused plaintiffs reputation, school, students, and graduates to be discredited and denied medical doctor certification by the ECFMG and other medical certification agencies. All to Plaintiffs damage in an amount to be proven at trial.

194 Gollin, Schwartz, the Illinois, Contreras and the ODA violated The Plaintiffs and the Class' right the right to First Amendment - Freedom of Speech, the Right to Peaceably Assemble and to Petition the Government for Redress while acting or purporting to act in the performance of their official duties.

195 Gollin, Schwartz, the Illinois, Contreras and the ODA's violations of the right to First Amendment - Freedom of Speech, the Right to Peaceably Assemble and to Petition the Government for Redress was a substantial factor in causing harm to Plaintiffs and the Class.

196 Plaintiffs and the Class are entitled to damages of past economic loss, future economic loss, past non-economic loss, including physical pain and mental suffering, and future non-economic loss, including physical pain and mental suffering in an amount to be proven at trial.

1 **2<sup>nd</sup> Cause of Action CONSTITUTIONAL VIOLATIONS UNDER 42 U.S.C. § 1983 (Fourth**  
2 **Amendment - Unreasonable Search and Seizure)**

3 197 Plaintiffs repeat and re-allege each and every preceding allegation in paragraphs 1-196 as  
4 if fully set forth herein.

5 198 The acts of the government Liberia as cited in paragraphs 1-198, by putting in jail,  
6 seizing Dolphin's passport, confining him to his office, keeping in the house for 15 days, and not  
7 permitting leaving Liberia for more than 200 days in 2005, violated the 4<sup>th</sup> amendment  
8 prohibition against unreasonable seizure as prohibited by the Friendship Treaty.

9 199 Plaintiff Dolphin is entitled to damages of past economic loss, future economic loss, past  
10 non-economic loss, including physical pain and mental suffering, emotional distress and  
11 psychological stress, for which Plaintiff Dolphin is entitled to actual compensatory, punitive and  
12 general damages according to proof at trial.

13  
14 **3<sup>rd</sup> Cause of Action - CONSTITUTIONAL VIOLATIONS UNDER 42 U.S.C. § 1983 (Fifth**  
15 **Amendment - Right to Due Process)**

16 200 Plaintiffs repeat and re-allege each and every preceding allegation in paragraphs 1-199 as  
17 if fully set forth herein,

18 201 Whereas defendants Liberia, Gollin, Schwartz, the Illinois, Contreras and the ODA  
19 intentionally and maliciously violated the Fifth Amendment - Right to Due Process of the  
20 Plaintiffs Plaintiffs and the Class. By harassing, libeling, slandering, Dolphin, SLSOM, SL-G,  
21 and the Class, without proof of their accusations, and without trial as required by the laws of  
22 Liberia, and as required by ORS 348.615 (Appeal Procedure for Unaccredited Institutions) and  
23 ORS 348.597 (Applicability of ORS 348.594 to 348.615), sending fraudulent letters to the  
24 Ghana NAB accusing the Plaintiffs and the Class of being criminals, and being denied a hearing.

25 202 Gollin, Schwartz, the Illinois, Contreras and the ODA violated The Plaintiffs and the  
26 Class Fifth Amendment - Right to Due Process while acting or purporting to act in the  
27 performance of their official duties.  
28

1 203 Gollin, Schwartz, the Illinois, Contreras and the ODA's violations of the Fifth  
2 Amendment - Right to Due Process was a substantial factor in causing harm to The Plaintiffs and  
3 the Class.

4 204 Plaintiffs and the Class are entitled to damages of past economic loss, future economic  
5 loss, past non-economic loss, including physical pain and mental suffering, and future non-  
6 economic loss, including physical pain and mental suffering in an amount to be proven at trial..

7  
8 **4<sup>th</sup> Cause of Action - CONSTITUTIONAL VIOLATIONS UNDER 42 U.S.C. § 1983**  
9 **(Eighth Amendment - Prohibiting Cruel and Unusual Punishment)**

10 205 Plaintiffs repeat and re-allege each and every preceding allegation in paragraphs 1-204 as  
11 if fully set forth herein.

12 206 Shariff and the Republic of Liberia intentionally and maliciously violated the Eighth  
13 Amendment - Prohibiting Cruel and Unusual Punishment of the Plaintiff Dolphin.

14 207 Shariff and the Republic of Liberia violated The Plaintiff Dolphin's Eighth Amendment -  
15 Prohibiting Cruel and Unusual Punishment while acting or purporting to act in the performance  
16 of their official duties, in violation of the Friendship Treaty.

17 208 Shariff and the Republic of Liberia's violations of the Eighth Amendment - Prohibiting  
18 Cruel and Unusual Punishment was a substantial factor in causing harm to Plaintiffs and the  
19 Class.

20 209 Plaintiff Dolphin is entitled to punitive, compensatory and general damages of past  
21 economic loss, future economic loss, past non-economic loss, including physical pain and  
22 mental suffering, and future non-economic loss, emotional distress, psychological pain and  
23 mental suffering in an amount to be proven at trial..

24  
25 **5<sup>th</sup> Cause of Action - CONSTITUTIONAL VIOLATIONS UNDER 42 U.S.C. § 1983**  
26 **(Fourteenth Amendment - Deprivation of Liberty, Due Process, and Equal Protection)**

27 210 Plaintiffs repeat and re-allege each and every preceding allegation in paragraphs 1-209 as  
28 if fully set forth herein. This all relates to Liberia not golin et al as stated above.

1 211 All the Defendants intentionally and maliciously violated the Fourteenth Amendment -  
 2 Deprivation of Liberty, Due Process, and Equal Protection of the Plaintiffs and the Class. The  
 3 acts of Shariff and the Liberia government to destroy Dolphin, SLSOM, SL-G, and the Class  
 4 were done in violation of all their rights under the constitution. The actions of Gollin, Schwartz,  
 5 Contreras, the Illinois, and the ODA destroy Dolphin, SLSOM, SL-G, and the Class were done  
 6 in violation of all their rights under the constitution. Under Oregon law, the Plaintiff, each and  
 7 all, were entitled to a hearing, which was denied to them. They were entitled to an appeal in the  
 8 Superior Court in the County in which they are located or operating. SLSOM was never located  
 9 in Oregon. Historically, only one student of SLSOM resided in Oregon. The other 250 or more  
 10 SLSOM students are not under the jurisdiction of the Oregon law and their rights to due process,  
 11 as well as the rights of Dolphin, SLSOM and SL-G were denied by the Defendants prejudice and  
 12 racial bias.

13 212 The Plaintiffs and the Class suffered irreparable harm and damages of a pecuniary nature,  
 14 mental and emotional shock, psychological deprivation, shame humiliation, ridicule and other  
 15 losses, all to the punitive, compensatory and general damage of the plaintiffs in an amount to be  
 16 proven at trial. Plaintiffs and the Class are entitled to damages of past economic loss, future  
 17 economic loss, past non-economic loss, including physical pain and mental suffering, and future  
 18 non-economic loss, including physical pain and mental suffering according to proof at trial.

19  
 20 **6<sup>th</sup> Cause of Action - CONSTITUTIONAL VIOLATIONS UNDER 42 U.S.C. § 1985(3)**  
 21 **(Conspiracy to Violate Civil Rights)**

22 213 Plaintiffs repeat and re-allege each and every preceding allegation in paragraphs 1-212 as  
 23 if fully set forth herein.

24 214 the act of imprisoning dolphin, publishing false and misleading, statements and articles in  
 25 news papers, sending out false letters defining the status of St. Luke, the decertifying SLSOM  
 26 and its students and graduates by Gollin, Schwartz, the Illinois, Contreras, the ODA, Shariff, the  
 27 Republic of Liberia, and the Ghana NAB intentionally and maliciously performed a Conspiracy  
 28

1 to Violate Civil Rights of the Plaintiffs and the Class, by denying them the opportunity to  
2 conduct a school, go to school, graduate from school, to make money and become doctors,  
3 violated their civil right to education and work..

4 215 The conspiratorial acts of all the defendants Conspiracy to Violate Plaintiffs Civil Rights  
5 was a substantial factor in causing harm to Plaintiffs and the Class.

6 216 Plaintiffs and the Class are entitled to punitive, compensatory, and general damages for  
7 past economic loss, future economic loss, past non-economic loss, including physical pain and  
8 mental suffering, and future non-economic loss, including physical pain and mental suffering in  
9 an amount to be proven at trial..

- 10 • HARASSMENT BY PUBLIC OFFICIALS (U.S. CONSTITUTION 14<sup>TH</sup>
- 11 AMENDMENT)
- 12 • VIOLATIONS OF ORS 348.615 (Appeal Procedure for Unaccredited Institutions)
- 13 • VIOLATIONS OF § 348.597 (Applicability of ORS 348.594 to 348.615)
- 14 • LIBEL (California Civil Code Section 45, 45a, 46)
- 15 • TRADE LIBEL
- 16 • INTERFERENCE IN BUSINESS ADVANTAGE (California Civil Code Section 2202)
- 17 • COLLUSION, BRIBERY, AND TRADING IN INFLUENCE
- 18 • VIOLATIONS OF §§ 2511 and 2520 of the Electronic Communications Privacy Act
- 19 (“EPCA”)
- 20 • VIOLATIONS OF 18 U. S. C. § 1030, § 2701 of the Stored Communication Act
- 21 (“SCA”)
- 22 • FRAUD (COMPUTER FRAUD AND ABUSE ACT (“CFAA”), 18 U.S.C. § 1030 )
- 23 • INTENTIONAL DISCRIMINATION IN EMPLOYMENT (Title 42, Chapter 21,
- 24 Subchapter I, § 1981(a))
- 25 • INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (California Jury
- 26 Instructions – CACI 1600)
- 27 • NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS (California Jury Instructions
- 28 – CACI 1620)

- 1 • THREATS AND EXTORTION AGAINST FOREIGN OFFICIALS (TITLE 18, PART I,
- 2 CHAPTER 41 § 878.)
- 3 • INVASION OF PRIVACY (Article 1, §1 of the California Constitution; )
- 4 • INTERNET STALKING (California Civil Code § 1708.7)

5 217 Contreras, the ODA, Gollin and Schwartz, the the Illinois Board of Govenors ratified” the  
6 decision knowing the unlawful reason for those actions and personally approved it after it had  
7 been made.

8 218 Defendants actions complained of herein were conscious, intentional, wanton and  
9 malicious entitling Plaintiffs and other members of the Class to an award of punitive damages.

10 219 Plaintiffs and the other members of the Class have no adequate remedy of law for  
11 Defendants continued violation of the Plaintiffs' and the Class' rights..

12  
13 **7<sup>th</sup> Cause of Action - CONSTITUTIONAL VIOLATIONS UNDER 42 U.S.C. § 1983 (Civil**  
14 **Action for Deprivation of Rights – State Liability)**

15 220 Plaintiffs repeat and re-allege each and every preceding allegation in paragraphs 1-219 as  
16 if fully set forth herein.

17 221 The Plaintiffs and the Class claims that Gollin, Schwartz, the Illinois, Contreras and the  
18 ODA denied the Plaintiffs, each and all, full and equal protection under the law because of their  
19 race, national origins, and/or the race and national origins of the owners of the institutions.

20 222 Gollin, Schwartz, the Illinois, Contreras and the ODA denied, aided, and or incited a  
21 denial of equal protection and equal civil rights and priviledges to Plaintiffs and the Class.

22 223 A major motivating reason for Gollin, Schwartz, the Illinois, Contreras and the ODA’s  
23 conduct was its racial perception of, and perception of the racial origin of the owners of  
24 Plaintiffs (African-American and African) and the Class. The race of the owners of, or the race  
25 of a person whom The Plaintiffs and the Class were associated with was a motivating reason for  
26 Gollin, Schwartz, the Illinois, Contreras and the ODA’s conduct;

27 224 The Plaintiffs and the Class were harmed; and Gollin, Schwartz, the Illinois, Contreras  
28 and the ODA’s conduct was a substantial factor in causing Plaintiffs and the Class harm.

1 225 Defendants actions complained of herein were conscious, intentional, wanton and  
2 malicious entitling Plaintiffs and other members of the Class to an award of punitive damages.

3 226 Plaintiffs and the other members of the Class have no adequate remedy of law for  
4 Defendants continued violation of the Plaintiffs' and the Class' rights.

5 227 Plaintiffs and the Class are entitled to punitive, compensatory, and general damages for  
6 past economic loss, future economic loss, past non-economic loss, including physical pain and  
7 mental suffering, and future non-economic loss, including physical pain and mental suffering in  
8 an amount to be proven at trial.

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10  
11 **8<sup>th</sup> Cause of Action - HARASSMENT BY PUBLIC OFFICIALS (U.S. CONSTITUTION**  
12 **14<sup>TH</sup> AMENDMENT)**

13 228 Plaintiffs repeat and re-allege each and every preceding allegation in paragraphs 1-227 as  
14 if fully set forth herein.

15 229 The Plaintiffs and the Class claim that they were harmed by being subjected to  
16 harassment because of the race of the predominant owners, the national origins of the Class, and  
17 the ethnicity of the locations of the institutions and that Gollin, Schwartz, the Illinois, Contreras  
18 and the ODA is responsible for that harm.

19 230 The Plaintiffs and the Class suffered harassment that was so severe, pervasive, and  
20 offensive that it effectively deprived them all of the right of equal access to educational benefits  
21 and opportunities;

22 231 The defendants, each and all, had actual knowledge of that harassment; and the  
23 Defendants, each and all, acted with deliberate indifference in the face of that knowledge. The  
24 Defendants, each and all acted, with deliberate indifference to their response to the harassment  
25 were clearly unreasonable in light of all the known circumstances.

26 232 The Plaintiffs and the Class claims that they, each and all, were harmed  
27 A.) by Sheriff's harassment, libel, slander, fraud, and conversion;  
28

1 B.) by harassment, libel, slander, fraud, and conversion of Roland;

2 C.) by harassment, libel, slander, fraud, and conversion other officials of the Republic of  
3 Liberia;

4 D.) by harassment, libel, slander, fraud, and conversion of officials of the NAB of the  
5 Republic of Ghana;

6 E.) by conversion of SLSOM's listing on the ECFMG – FAIMER's International Medical  
7 Education Directory;

8 F.) by libel, slander and fraud of Gollin;

9 G.) by libel, slander and fraud of Schwartz;

10 H.) by libel, slander and fraud of Gollin and Schwartz approved by the Illinois;

11 I.) by libel, slander and fraud of Contreras;

12 J.) and, by libel, slander and fraud of Contreras approved by the ODA.

13 233 Plaintiffs and the Class also claim that Shariff and Roland are responsible for the harm  
14 because Shariff and Roland were acting as their employers, the Liberia NTLA, and the NCHE,  
15 respectively, when the incidents occurred.

16 234 St. Luke Dolphin, and the Class also claim that Gollin, Schwartz, the Illinois, Contreras  
17 and the ODA are responsible for the harm because Gollin and Schwartz were acting as  
18 employees of the Illinois (Gollin and Schwartz) and the ODA ( Contreras ) when the incidents  
19 occurred.

20 235 Plaintiffs and the Class also claim that Carole Bede is responsible for the harm because  
21 Carole Bede was acting as employee of ECFMG – FAIMER when the incidents occurred.

22 236 Plaintiffs and the Class also claim that unknown does are responsible for the harm  
23 because unknown does were acting as employees of the NAB of the Republic of Ghana when  
24 the incidents occurred.

25 237 Defendants actions complained of herein were conscious, intentional, wanton and  
26 malicious entitling Plaintiffs and other members of the Class to an award of punitive damages  
27 according to proof.  
28

1 238 Plaintiffs and the other members of the Class have no adequate remedy of law for  
2 Defendants continued violation of the Plaintiffs' and the Class' rights.

3 239 Plaintiffs and the Class are entitled to punitive, compensatory, and general damages for  
4 past economic loss, future economic loss, past non-economic loss, including physical pain and  
5 mental suffering, and future non-economic loss, including physical pain and mental suffering in  
6 an amount to be proven at trial..

7  
8 **9<sup>th</sup> Cause of Action - VIOLATIONS OF § 348.597 (Applicability of ORS 348.594 to**  
9 **348.615)**

10 240 Plaintiffs repeat and re-allege each and every preceding allegation in paragraphs 1-239 as  
11 if fully set forth herein.

12 241 Wrongful Use of Administrative Proceedings. The Plaintiffs and the Class claims that  
13 Gollin, Illinois, Contreras and the ODA wrongfully brought an administrative proceeding against  
14 the Plaintiffs and the Class.

15 242 Gollin, Schwartz, Illinois, Contreras and the ODA was actively involved in listing  
16 SLSOM on the Oregon "Diploma Mill List" without the appropriate administrative proceeding;

17 243 The ODA did not conduct an independent investigation; The private proceeding ended in  
18 The Plaintiffs' and the Class' disfavor. No reasonable person in Gollin, Contreras and the ODA's  
19 circumstances would have believed that there were reasonable grounds to bring the proceeding  
20 against Plaintiffs and the Class,

21 244 Gollin, Schwartz, Contreras, the Illinois, and the ODA acted primarily for a purpose  
22 other than succeeding on the merits of the claim;

23 245 The Plaintiffs and the Class was harmed; and

24 246 Gollin, Schwartz, the Illinois, Contreras and the ODA's conduct by publishing the  
25 diploma mill list that included SLSOM, and sending the 91-page documents to the the NAB and  
26 to officials of the Republic of Ghana were substantial factors in causing harm to Plaintiffs and  
27 the Class.  
28

1 247 Defendants actions complained of herein were conscious, intentional, wanton and  
2 malicious entitling Plaintiffs and other members of the Class to an award of punitive damages.

3 248 Plaintiffs and the other members of the Class have no adequate remedy of law for  
4 Defendants continued violation of the Plaintiffs' and the Class' rights.

5 249 Plaintiffs and the Class are entitled to punitive, compensatory, and general damages for  
6 past economic loss, future economic loss, past non-economic loss, including physical pain and  
7 mental suffering, and future non-economic loss, including physical pain and mental suffering in  
8 an amount to be proven at trial..

9  
10 **10<sup>th</sup> Cause of Action - VIOLATIONS OF ORS 348.615 (Appeal Procedure for**  
11 **Unaccredited Institutions)**

12 250 Plaintiffs repeat and re-allege each and every preceding allegation in paragraphs 1-249 as  
13 if fully set forth herein.

14 251 Abuse of Process. Plaintiffs and the Class claim that Gollin, the Illinois, Contreras and  
15 the ODA wrongfully inserted SLSOM on the State of Oregon's "Diploma Mill List".

16 252 That Gollin, the Illinois, Contreras and the ODA knew that Plaintiffs and the Class were  
17 each and all located outside the state of Oregon, and therefore outside the jurisdiction established  
18 the the law itself. ORS 348.615 states "If the Oregon Student Assistance Commission refuses to  
19 grant approval to a school to confer degrees or revokes the approval to confer degrees, the  
20 refusal or revocation shall be subject to the right of review by an action brought in the circuit  
21 court of the county in which the school is located."

22 253 Gollin, Schwartz, the Illinois, Contreras and the ODA intentionally used this confusing  
23 and unconstitutional act.

24 254 The defendants used the procedure to alleged false, libelous, and defamatory statements  
25 insinuating that Dolphin, the owners of SLSOM, SL-G , and the Class are criminals, something  
26 that that procedure was not designed to achieve;

1 255 As a result of the defendants actions Plaintiffs and the Class was harmed; and, Gollin,  
2 the Illinois, Contreras and the ODA's conduct was a substantial factor in causing Plaintiffs and  
3 the Class harm

4 256 Defendants actions complained of herein were conscious, intentional, wanton and  
5 malicious entitling Plaintiffs and other members of the Class to an award of punitive damages  
6 according to proof at trial.

7 257 Plaintiffs and the other members of the Class have no adequate remedy of law for  
8 Defendants continued violation of the Plaintiffs' and the Class' rights.

9 258 The Plaintiffs and the Class are entitled to punitive, compensatory and general damages  
10 in an amount to be determined at trial.

11  
12 **11<sup>th</sup> Cause of Action - LIBEL (California Civil Code Section 45, 45a, 46)**

13 259 Plaintiffs repeat and re-allege each and every preceding allegation in paragraphs 1-258 as  
14 if fully set forth herein.

15 260 Defendants, each all, made many false public statements concerning SLSOM and their  
16 principle owner Dolphin and the Class. The defendants, each of them, in publishing false and  
17 untrue statements, alleged, did so intentionally, with knowledge that said statements had no  
18 foundation in truth, or did not exercise due diligence, in ascertaining the truth or falsity of the  
19 statements they published. In doing this acts the defendants, each of them, acted maliciously to  
20 defame St. Luke I Dolphin and the class and therefore entitling plaintiffs to punitive,  
21 compensatory and general damages in an amount to be proven at trial.

22  
23 **ECFMG and FAIMER**

24 261 On January 20, 2005, defendants Carole Bede of ECFMG and FAIMER, and each of  
25 them, acting in their official capacity, received an unnamed and unsigned letter on NCHE  
26 letterhead that stated: "St. Luke School of Medicine is not registered or accredited as a medical  
27 school in Liberia." Thereafter, without confirming any of this information and without  
28

1 contacting St. Luke or Dolphin, She immediately removed St. Luke the International Medical  
2 Education Directory (IMED).

3 262 On April 25, 2005 Carole Bede removed St. Luke from the IMED based on a sloppily  
4 typed letter purportedly signed by Roland stating that SLSOM was a “computer” school. Carole  
5 Bede had a duty to ascertain the authenticity of the letter before removing SLSOM from the  
6 IMED. Thereafter, again, without confirming any of this information and without contacting St.  
7 Luke or Dolphin, She immediately removed St. Luke School of Medicine - Liberia from the  
8 International Medical Education Directory (IMED).

9 263 Carole Bede, as the executive officer of ECFMG and FAIMER, had a duty to ascertain  
10 the authenticity of the unnamed and unsigned letter before removing SLSOM from the IMED in  
11 January and April 2005. She also had a duty to restore SLSOM to the IMED by order of the  
12 Liberian Supreme Court and the NCHE between September 2005 through January 2006, and  
13 even until now, to which she did not. Her unilateral actions caused plaintiffs shame and ridicule,  
14 which led to the denial of privileges of being certified as a medical school and SLSOM graduates  
15 being denied the honors of being doctors. The Plaintiffs and the Class are entitled to punitive,  
16 compensatory and general damages in an amount to be determined at trial.

### 17 **GEORGE GOLLIN AND THE UNIVERSITY OF ILLINOIS**

18  
19 264 Gollin has been publishing defamatory information against SLSOM on his website at the  
20 Illinois since 2003. Gollin has admitted that he is a consultant to the Republic of Liberia and  
21 Liberia’s Ministry of Education. In this manner, Gollin played a significant role in assisting  
22 Shariff, Bahr and Roland in sending false information to ECFMG, ultimately resulting in  
23 SLSOM’s removal from the IMED, and played a significant role in the extortion and “shake  
24 down” of SLSOM and Dolphin. Gollin’s published statements on his Illinois website have been  
25 used and referenced on at least 36 different websites in the United States alone. Some of the false  
26 statements published on Gollin’s Illinois site are presented here:

- 27 a. Gollin lists SLSOM as a “diploma mill” on his Illinois website. On his site, Gollin  
28 defines a “diploma mill” as an “organization or individual that produces and sells

1 diplomas, degrees transcripts, or other academic records that are meant to give the  
2 impression of academic achievement, but really represent little or no study.” FALSE.

3 b. On his site, Gollin published that “St. Regis University even operated St. Luke’s  
4 School – they put MDs out there on the street. These were medical degrees that were not  
5 just to hang on the wall, they were going to use them.” FALSE

6 c. On his site, Gollin published that “David Karam, one of the apparent owners of  
7 SLSOM, organized a company manufacturing products described as curing skin cancer  
8 and offering potential treatments for diabetes and hepatitis. As ‘Executive Vice President  
9 and Chief Medical Officer’ his fake M.D. lent an air of legitimacy that helped convince a  
10 pair of investors to buy \$400,000 of stock in “Bio-Life Labs, Inc.,” shortly before its  
11 officers abandoned the company.” FALSE

12 d. “St. Luke is a diploma mill.” FALSE

13 e. “A U.S. State Department official says it’s fake. FALSE

14 f. “Liberia says it’s illegal.” FALSE

15 g. “A Ghanaian official said it’s bogus.” FALSE

16 h. “Liberia says St. Luke is a fake.” FALSE

17 I. “St. Luke School of Medicine: [www.stluke.edu](http://www.stluke.edu), an entirely fake medical school run  
18 from TX, KY, CA.” FALSE

19 j. “Another unaccredited entity is the “St. Luke School of Medicine” with domain  
20 <http://stluke.edu>’ St. Luke was declared illegal by Liberia in 2004 but continues to operate,  
21 using various U.S. addresses. At least three of its American “graduates” have served  
22 prison terms for attempting to treat patients.” FALSE

23 k. “Do recall that a number of customers of “St. Luke School of Medicine” have  
24 been incarcerated for their activities, but that the (American) operators of this supposedly  
25 Liberian, Ghanaian, California, Texan, and Kentuckian monstrosity are out and about,  
26 selling patient medicines, issuing degrees, and selling stock in a company that claimed to  
27 market a cure for skin cancer.” FALSE  
28

1 l. "It could be quackery. It could be criminal. The American Medical Association  
2 needs to get involved." FALSE

3 m. "The American owners of the "St. Luke School of Medicine" took advantage of  
4 the catastrophic civil war in Liberia to claim, without governmental challenge, to be  
5 training medical students in Monrovia. (They weren't.) FALSE

6 n. In 2005 U.S. Embassy personnel in Liberia visited St. Luke and found 'no  
7 evidence of anything resembling a functioning medical school." FALSE

8 o. "Even the vile St. Luke Medicine retains its .edu domain." FALSE

9 p. Gollin threatened to put SLSOM "out of business."

10 q. and, many more libelous statements against Dolphin and St. Luke School of  
11 Medicine and the Class too numerous to included in this petition. However, the  
12 Plaintiffs and the Class reserve the right to introduce other false statements made by the  
13 Defendant Gollin and others.

14 r. the many libelous, false, and fraudulent statements made by Gollin in Exhibits 41,  
15 42, 43, and 45.

16 265 Gollin has published the entire 91-page document that he sent to the NAB of the  
17 Republic of Ghana on his Illinois website which is packed with blatantly false, fraudulent,  
18 magical, and contrived statements about, St. Luke , SLSOM graduates, and others. He claims  
19 that this document is public domain because it was presented in court. The statement is blatantly  
20 false because Dolphin only presented the first 5 pages of the document to the court in federal  
21 lawsuit, 10-CV-01791-RGK (SHx). Exhibit 40.

22 266 The Plaintiffs and the Class present a detailed list of false, libelous, and threatening  
23 statements of the 91-page document authored by Gollin and the Illinois (Exhibits 42 & 43), in  
24 Exhibit 52.

25 267 Plaintiffs and the Class, each and all, claim that Gollin harmed them by making the the  
26 false statement(s) referenced above. The defendant Gollin made the statement to the worldwide  
27 population on the Internet, to people other than Plaintiffs and the Class; These people other that  
28 the Plaintiffs and the Class reasonably understood that the statements were about Plaintiffs and

1 the Class; these people other than the Plaintiffs and the Class reasonably understood the  
2 statements to mean that “Plaintiffs and the Class had committed a crime” and were criminals,  
3 cheats, frauds, and scum-bags. The above statements made by Gollin were false. The Defendant  
4 Gollin knew the statement(s) false or had serious doubts about the truth of the statement(s).

5 268 The Plaintiffs and the Class are entitled to punitive, compensatory and general damages  
6 in an amount to be determined at trial.

7 **MOHAMMED SHARIFF, THE MINISTRY OF EDUCATION, THE**  
8 **NATIONAL COMMISSION ON HIGHER EDUCATION, AND THE**  
9 **MINISTRY OF HEALTH OF THE REPUBLIC OF LIBERIA**

10  
11 269 On March 16, 2005, in “The Inquirer”, Monrovia, Liberia, Assemblyman Shariff stated  
12 that, “the whole thing about the school is fake.” and made false and threatening statements  
13 against Dolphin.

14 270 On March 22, 2005, in a letter addressed to SLSOM regarding a recent “inspection” Dr  
15 Horatius Browne of the Liberian Medical Board stated that SLSOM had no library, books,  
16 handbook or laboratories. Dr. Browne also stated in his letter that SLSOM was not  
17 “representative of a Medical College.”

18 271 On March 31, 2005, the Inquirer reported that the Liberian Medical Board, at a NCHE  
19 hearing called by Shariff, stated, “there is no school in Liberia known as the St. Luke School of  
20 Medicine”, that it was “illegal”, and “counterfeit.” Dr. Benson Barh, Chief Medical Officer of  
21 Liberia, stated “we are not aware and have no knowledge of *the* medical school.” All the  
22 statements made by the Liberian Medical Board were patently false.

23 272 On that same day, Bahr stated that the building where SLSOM was located was “a run  
24 down dwelling home under major renovation which lacks electricity, laboratory, class rooms,  
25 running water.”

26 273 On April 11, 2005, the NCHE issued a letter to ECFMG that stated SLSOM “does not  
27 exist” and was a “computer school.”

1 274 On April 12, 2005, Roland and Dr. Kondikai (Minister of Education) both stated at an  
2 NTLA hearing that SLSOM “does not exist in Liberia.”

3 275 On May 10, 2005, the NTLA declared that SLSOM was “a fake medical institute and is  
4 not a legal establishment” and had endangered “the health of the public and should be turned  
5 over to the Justice Ministry for prosecution.”

6 276 BARH sent a letter to the W.H.O. Representative in Monrovia stating that St. Luke  
7 School of Medicine “Does not exist in Liberia” after he and the LMB inspected SLSOM's  
8 facilities. This is an obviously false and fraudulent statement. EXHIBIT 40 (reserved)..

9 277 Barh also sent a copy of the same letter to the NAB of Ghana as well as to the Medical  
10 and Dental Council of the Republic of Ghana in an effort to defame Dolphin and St. Luke School  
11 of Medicine.. EXHIBIT 40 (reserved).

12 278 As specified above, the Plaintiffs and the Class, each and all, were injured by the  
13 publishing and distribution of the letters, documents, and media articles, and the radio broadcast  
14 of the false statements.

15 279 Plaintiffs and the Class, each and all, claim that Shariff, the Ministry of Education, the  
16 NCHE, and the MH of the Republic of Liberia harmed them by making the the false statement(s)  
17 referenced above. The defendants Shariff, the Ministry of Education, the NCHE, and the MH of  
18 the Republic of Liberia made the statement to the worldwide population on the Internet, to  
19 people other than Plaintiffs and the Class; These people other than the Plaintiffs and the Class  
20 reasonably understood that the statements were about Plaintiffs and the Class; That these people  
21 other than the Plaintiffs and the Class reasonably understood the statements to mean that  
22 “Plaintiffs and the Class had committed a crime” and were criminals, cheats, frauds, and scum-  
23 bags.

24 280 The above statements made by Shariff, the Ministry of Education, the NCHE, and the  
25 MH of the Republic of Liberia were false. The Defendants Shariff, the Ministry of Education,  
26 the NCHE, and the MH of the Republic of Liberia knew the statement(s) false or had serious  
27 doubts about the truth of the statement(s).  
28

1 281 The Plaintiffs and the Class are entitled to punitive, compensatory and general damages  
2 in an amount to be determined at trial.

3 **BRAD SCHWARTZ AND THE UNIVERSITY OF ILLINOIS**  
4

5 282 Schwartz and the Illinois College of Medicine did libel the Plaintiffs and the Class with  
6 the document he sent to the NAB of the Republic of Ghana. Exhibit 51. The Plaintiffs and the  
7 Class incorporate Exhibit 54 (a list of fraudulent, false, and threatening statements of Schwartz  
8 and the Illinois).

9 283 Plaintiffs and the Class, each and all, claim that Schwartz and the Illinois harmed them by  
10 making the the false statement(s) referenced above. The defendants Schwartz and the Illinois  
11 made the statements to the worldwide population on the Internet, to people other than Plaintiffs  
12 and the Class; These people other that the Plaintiffs and the Class reasonably understood that the  
13 statements were about Plaintiffs and the Class; That these people other than the Plaintiffs and the  
14 Class reasonably understood the statements to mean that "Plaintiffs and the Class had committed  
15 a crime" and were criminals, cheats, frauds, and scum-bags.

16 284 The Plaintiffs and the Class are therefore entitled to punitive, compensatory and general  
17 damages in an amount to be determined at trial.

18 **ALAN CONTRERAS AND THE OREGON ODA**  
19

20 285 Contreras and the ODA did libel the Plaintiffs and the Class since 2003 on their website.

21 286 The Plaintiffs and the Class present a detailed list of false, libelous, and threatening  
22 statements authored by Contreras and the ODA (Exhibits 49 and 50), in Exhibit 53.

23 287 Contreras and the ODA did libel the Plaintiffs and the Class with the documents he sent  
24 to the NAB of the Republic of Ghana. Exhibit 49 and 50. The Plaintiffs and the Class  
25 incorporate Exhibit 53 (a list of fraudulent, false, and threatening statements of Contreras and the  
26 ODA).

27 288 Plaintiffs and the Class, each and all, claim that Contreras and the ODA harmed them by  
28 making the the false statement(s) referenced above. The defendants Contreras and the ODA

1 made the statements to the worldwide population on the Internet, to people other than Plaintiffs  
2 and the Class; These people other than the Plaintiffs and the Class reasonably understood that the  
3 statements were about Plaintiffs and the Class; That these people other than the Plaintiffs and the  
4 Class reasonably understood the statements to mean that “Plaintiffs and the Class had committed  
5 a crime” and were criminals, cheats, frauds, and scum-bags.

6 289 The Plaintiffs and the Class are entitled to punitive, compensatory and general damages  
7 in an amount to be determined at trial.

8  
9 **THE NAB OF THE REPUBLIC OF GHANA**

10 290 The Ghana NAB did submit the fraudulent, libelous, and threatening documents to appeal  
11 the judgment of the Ghana High Court in favor of SL-G in December 2009 in an effort to  
12 publicly libel and slander the Plaintiffs and the Class. Exhibit 42, 43, and 47 – 54.

13 291 As specified below, the Plaintiffs and the Class, each and all, were injured by the  
14 publishing and distribution of the letters, documents, and media articles, and the radio broadcast  
15 of the false statements.

16 292 Plaintiffs and the Class, each and all, claim that NAB harmed them by making the the  
17 false statement(s) referenced above. The defendant NAB made the statements to the worldwide  
18 population on the Internet, to people other than Plaintiffs and the Class; These people other than  
19 the Plaintiffs and the Class reasonably understood that the statements were about Plaintiffs and  
20 the Class; That these people other than the Plaintiffs and the Class reasonably understood the  
21 statements to mean that “Plaintiffs and the Class had committed a crime” and were criminals,  
22 cheats, frauds, and scum-bags.

23 293 The Plaintiffs and the Class are entitled to punitive, compensatory and general damages  
24 in an amount to be determined at trial.

25 294 The Defendants, each and all, knew the statements to be false and acted intentionally  
26 causing the statements to be published in the media and on the internet.

27 295 The Defendants, each and all, were negligent or acted recklessly in failing to determine  
28 whether the statements contained in the ad were true before publishing the false statements.

1 296 The Defendants Shariff and Officials of the Republic of Liberia acted in lawless  
2 disregard continuously making false, libelous, and threatening statements to Dolphin, officials of  
3 SLSOM, SL-G , and the Class. Defendants, each and all, knew the statements the made to be  
4 false and acted intentionally in causing the documents and statements to be published and  
5 distributed.

6 297 Defendant Roland and the NCHE and the Ministry of Education sent a fraudulent,  
7 defamatory and libelous letter (Exhibit 11) to the Educational Commission for Foreign Medical  
8 Graduates in March 2005. Defendant Roland knew the statements to be false and acted  
9 intentionally in causing the documents and statements to be published and distributed.

10 298 Defendants Educational Commission for Foreign Medical Graduates and Foundation for  
11 Advancement of Medical Education and Research were complicit in the libel, who without  
12 question removed SLSOM from the International Medical Education Directory.

13 299 Professor Gollin knew all of his alleged statements detailed in Exhibit 43 and 45 and  
14 repudiated in Exhibit 52 to be false and acted intentionally in causing the documents and  
15 statements to be published and distributed.

16 300 Dr. Schwartz knew all of his alleged statements detailed in Exhibit 51, and repudiated in  
17 Exhibit 54, to be false and acted intentionally in causing the documents and statements to be  
18 published and distributed.

19 301 Contreras knew all of his alleged the statements detailed in Exhibit 49 and repudiated in  
20 Exhibit 53 to be false and acted intentionally in causing the documents and statements to be  
21 published and distributed.

22 302 The Illinois actions were negligent or acted recklessly in providing Gollin a website,  
23 letterhead, permission and authority in which to make false statements concerning SL-G ,  
24 SLSOM, Dolphin, and the Class.

25 303 The Illinois actions were negligent or acted recklessly in providing Schwartz, letterhead,  
26 permission and authority in which to make false statements concerning SL-G , SLSOM, Dolphin,  
27 and the Class.  
28

1 304 The State of Oregon ODA actions were negligent or acted recklessly in providing  
2 Contreras with website, unrestricted unlawful permission to publish the "diploma mill" list,  
3 letterhead, permission and authority in which to make false statements concerning St. Luke  
4 Dolphin, and the Class.

5 305 As specified above, the St. Luke Dolphin, and the Class, each and all, were injured by the  
6 publishing and distribution of the letters, documents, and media articles, and the radio broadcast  
7 of the false statements made by the Defendants. The name and reputation of Plaintiffs and the  
8 Class were besmirched by the Defendants, each and all. Additionally, the Republic of Liberia  
9 and its conspirators continued to caused the disruption of SLSOM even though the Supreme  
10 Court issued an order to restore SLSOM to its previous status, Exhibit 14, it was ignored and  
11 SLSOM was uncompensated for damages, Exhibit 21 – Exhibit 30.

12 **Actual Damages**

13  
14 306 The Plaintiffs and the Class are entitled to recover actual damages against The  
15 Defendants' wrongful conduct was a substantial factor in causing the following:

- 16 a. Harm to The Plaintiffs and the Class' property, business, trade, profession, or  
17 occupation;  
18 b. Created Expenses the Plaintiffs and the Class had to pay as a result of the defamatory  
19 statements;  
20 c. Harm to The Plaintiffs and the Classs reputation; or  
21 Shame, mortification, or hurt feelings.

22 307 Even if Plaintiffs and the Class has not proved any actual damages for harm to reputation  
23 or shame, mortification or hurt feelings, the law nonetheless assumes that they suffered this  
24 harm.

25 308 Without presenting evidence of damage, Plaintiffs and the Class is entitled to receive  
26 compensation for this assumed harm in whatever sum you believe is reasonable.  
27  
28

1 **Punitive Damages**

2 309 Plaintiffs and the Class may also recover damages to punish The Defendants if they prove  
3 by clear and convincing evidence that The Defendants acted with malice, oppression, or fraud.

4 310 Defendants, each all, made many false written and published public statements  
5 concerning SLSOM, SL-G , its principle owner Dolphin, and the Class.

6 311 Defendants, each and all, had the responsibility to assure that the information they  
7 desiminated on the Internet, newspapers, and other media was true, accurate, and correct to  
8 which they, each and all, did not bother (or care) to verify its truthfulness.  
9

10 **13<sup>th</sup> Cause of Action - TRADE LIBEL & INTERFERENCE IN BUSINESS ADVANTAGE**  
11 **(California Civil Code Section 2202). Intentional Interference With Prospective Economic**  
12 **Relations**

13 312 Plaintiffs repeat and re-allege each and every preceding allegation in paragraphs 1-311 as  
14 if fully set forth herein.

15 313 SLSOM owned a Charter and an Act of Legislature, making St. Luke School of Medicine  
16 - Liberia a legal and corporate entity with perpetual succession, having the authority to contract,  
17 sue and be sued, plead and be impleaded in any court of competent jurisdiction within the  
18 Republic; to purchase or otherwise acquire and hold property, real and mixed up to the value of  
19 one hundred and fifty million United States dollars (US\$150,000,000); making St. Luke School  
20 of Medicine (SLSOM) to be perpetually maintained in the Republic of Liberia for medical  
21 education of the people of the Liberian nation, people of the other countries and for those who  
22 may otherwise have the capacity to seek medical education.  
23

24 314 Defendants, and each of them, were aware of SLSOM's economic relationship with the  
25 Republic of Liberia, ECFMG, potential medical students worldwide, and the World Health  
26 Organization, by virtue of the enabling documents: the Act, Charter, and Statement of  
27 Attestation. Defendants were aware of SLSOM's legitimate status, and SLSOM's profit making  
28 potential and actuality. Defendants' False Public and Private Statements were designed to disrupt

1 SLSOM's worldwide economic relationships. Defendants' False Public Statements caused  
2 ECFMG to permanently remove SLSOM from the IMED, even after a Liberian Supreme Court  
3 order and several subsequent NCHE letters requested that St. Luke School of Medicine - Liberia  
4 be reinstated. As a consequence of SLSOM's removal from the IMED, medical students and  
5 graduates lost jobs, residencies, and positions. Additionally, SLSOM's graduates who had  
6 legitimately earned degrees and licenses had them revoked and properly earned degrees  
7 invalidated. The actions of the Defendants, each and all of them, ruined the reputation of  
8 Dolphin, and resulted in the loss of .business opportunities for Dolphin in Liberia, Ghana,  
9 Nigeria, and the United States of America. The acts of the defendants were done with the  
10 specific intent to destroy SLSOM, SL-G , Dolphin, and discredit the degrees of the the Class.  
11 The plaintiffs and the Class are entitled to damages for the loss of there licenses, school and  
12 income according to proof at trial.

13 317. Defendants False Public Statements caused ECFMG to permanently remove SLSOM  
14 from the IMED, even after a Liberian Supreme Court order and several subsequent NCHE letters  
15 requested that SLSOM be reinstated. As a consequence of SLSOM's removal from the IMED,  
16 Medical Students lost jobs, residencies, and positions. Additionally, certain members of the  
17 Class had their earned licenses revoked and properly earned degrees invalidated. The actions of  
18 the Defendants, each and all of them, ruined the reputation of Dolphin and the Class and resulted  
19 in the loss of .business opportunities for Dolphin in Liberia, Ghana, and the United States of  
20 America and the Class worldwide.

21 318. The Defendants NAB, Gollin and Schwartz of the Illinois, Contreras and ODA's  
22 fraudulent and false Public Statements were meant to discredit SL-G in the United States and the  
23 Republic of Ghana government agencies and personnel.

24 319. The Plaintiffs and the Class claim that Gollin, Schwartz, the Illinois, Contreras and the  
25 ODA intentionally interfered with an economic relationship between them and the NAB of the  
26 Republic of Ghana that probably would have resulted in an economic benefit to The Plaintiffs  
27 and the Class.  
28

1 320. The Plaintiffs and the Class and NAB were in an economic relationship that probably  
2 would have resulted in an economic benefit to SL-G , Dolphin, and the Class.

3 321. Gollin, Schwartz, the Illinois, Contreras and the ODA knew of the relationship;

4 322. Gollin, Schwartz, the Illinois, Contreras and the ODA intended to disrupt the  
5 relationship;

6 323. Gollin, Schwartz, the Illinois, Contreras and the ODA engaged in wrongful conduct  
7 through fraud, libel, misrepresentation and violation of the stature.

8 324. The Plaintiffs' and the Class' economic relationships were disrupted;

9 325. The Plaintiffs and the Class were harmed; and

10 326. Gollin, Schwartz, the Illinois, Contreras and the ODA's wrongful conduct was a  
11 substantial factor in causing Plaintiffs and the Class harm.

12 327. Defendants actions complained of herein were conscious, intentional, wanton and  
13 malicious entitling Plaintiffs and other members of the Class to an award of punitive,  
14 compensatory and general damages.

15 328. Plaintiffs and the other members of the Class have no adequate remedy of law for  
16 Defendants continued violation of the Plaintiffs' and the Class' rights.

17  
18 **14<sup>th</sup> Cause of Action - VIOLATIONS OF §§ 2511 and 2520 of the Electronic**  
19 **Communications Privacy Act ("ECPA")**

20 329. Plaintiffs repeat and re-allege each and every preceding allegation in paragraphs 1-328 as  
21 if fully set forth herein.

22 330. Plaintiffs and the Class and the Class assert this Count against Gollin and the Illinois,  
23 jointly and severally, pursuant to §§ 2511 and 2520 of the ECPA, 18 D.S.C. §§ 2511 and 2520.

24 331. Section 2511 of the ECPA provides in part:

25 (1) Except as otherwise specifically provided in this chapter any person who-

26 (a) intentionally intercepts, endeavors to intercept, or procures any other person to  
27 intercept, or endeavor to intercept, any ... electronic communications;

1 (d) intentionally uses, or endeavors to use, the contents  
2 of any ... electronic communication knowing or having reason to know that the  
3 information was obtained through the interception of a[n] ... electronic  
4 communication in violation of this subsection; ... shall be punished as provided in  
5 subsection (4) or shall be subject to suit as provided in subsection (5).

6 332. Section 2520 of the ECPA provides in part:

7 (a) In general. -Except as provided in section 2511 (2)(a)(ii), any person whose ... electronic  
8 communication is intercepted ... or intentionally used in violation of this chapter may in a civil  
9 action recover from the person or entity which engaged in that  
10 violation such relief as may be appropriate.

11 (b) Relief.-In the action under this section, appropriate relief includes-

- 12 (1) such preliminary and other equitable or declaratory relief as may be appropriate  
13 (2) damages under subsection (c) and punitive damages in appropriate cases; and  
14 (3) a reasonable attorney's fee and other litigation costs reasonably' incurred.

15 333. Section 2510 of the ECPA, setting forth the definitions of the terms in § 2511, defines  
16 "person" to include "any employee, or agent of the United States or any State or political  
17 subdivision thereof .... " 18 U.S.C. § 2510(6). Accordingly, each Gollin and the Illinois is a  
18 "person" within the meaning of § 2511.

19 334. Section 2510 defines "electronic communication" to include "any transfer of signs,  
20 signals, writing, imaging, sounds, data, or intelligence of any nature transmitted in whole or in  
21 part by a wire, radio, electromagnetic, photo electronic, or photo optical system that affects  
22 interstate or foreign commerce, ... " 18 U.S.C. § 2510(12). Accordingly, the Gollin's Exhibit 1  
23 complained of constitute an "electronic communication" within the meaning of § 251.1.

24 335. Section 2510 defines "intercept" to mean "the aural or other acquisition of the contents of  
25 any wire, electronic, or oral communication through the use of any electronic, mechanical, or  
26 other device.." 18 U.S.C. § 2510(4). Section 2510 defines "electronic, mechanical, or other  
27 device" to mean "any device or apparatus which can be used to intercept a wire, oral, or  
28 electronic communication," subject to exclusions not relevant to this action. 18 U.S.C. § 2510(5).

1 336. The software/hardware used by Gollin to remotely activate and steal Exhibit 1  
2 complained of constitute an "electronic ... device" within the meaning of 18 U.S.C. § 2510(5).  
3 By using said software/hardware to secretly obtain Exhibit 1, each Defendant Gollin and the  
4 Illinois "intercepts" that communication within the meaning of § 2510.

5 337. By virtue of the foregoing, Plaintiffs SLSOM, Dolphin and each member of the Class is a  
6 "person whose ... electronic communication is intercepted ... or intentionally used in violation of  
7 this chapter" within the meaning of § 2520.

8 338. By virtue of the foregoing, Defendants Gollin and the Illinois are liable to Plaintiffs and  
9 the Class and the other members of the Class for their violations of §§ 2511 and 2520 of the  
10 ECPA.

11 339. Since Plaintiffs and the Class first learned of Defendants' unlawful seizure of Exhibit 1  
12 complained of on November 11, 2009, this action is timely and not beyond ECPA's applicable  
13 statute of limitations.

14 340. Defendants' actions complained of herein were conscious, intentional, wanton and  
15 malicious, entitling Plaintiffs and the Class and the other members of the Class to an award of  
16 punitive, compensatory and general damages.

17 341. Plaintiffs and the other members of the Class have no adequate remedy at law for  
18 Defendants continued violation of the ECPA.

19  
20 **15<sup>th</sup> Cause of Action - FRAUD (COMPUTER FRAUD AND ABUSE ACT ("CFAA"), 18**  
21 **U.S.C. § 1030 )**

22 342. Plaintiffs repeat and re-allege each and every preceding allegation in paragraphs  
23 1-340 as if fully set forth herein.

24 Section 2701 of the SCA provides, in pertinent part:

25 Except as provided in subsection (c) of this section, whoever-

26 1) intentionally accesses without authorization a facility through which an electronic  
27 communication service is provided; or intentionally exceeds an authorization to access  
28 that facility; and thereby obtains, alters or prevents authorized access to a wire or

1 electronic communication while it is in electronic storage in such system shall be  
2 punished as provided in subsection (b) of this section.

3 343. Section 2711 of the SCA defines "electronic communication" as "any transfer of signs,  
4 signals, writing, images, sounds, data or intelligence of any nature transmitted in whole or in part  
5 by a wire, radio, electromagnetic, photo electronic or photo optical system that affects interstate  
6 or foreign commerce .... " 18 U.S.C. §§ 2711, 2510(12). Accordingly, the documentation stolen  
7 Exhibit 1 by Gollin complained of are "electronic communications" within the meaning of the  
8 SCA.

9 344. Section 2711 of the SCA defines "person" to include "any employee, or agent of the  
10 United States or of a State or political subdivision thereof, and any individual, partnership,  
11 association .... " 18 U.S.C. §§ 2711, 2510(6). Accordingly, all Gollin and the Illinois are  
12 "persons" within the meaning of the SCA.

13 345. Section 2711 of the SCA defines "electronic storage" to include "any temporary  
14 intermediate storage of a wire or electronic communication incidental to the electronic  
15 transmission thereof .... " 18 U.S.C. §§ 2711, 2510(17)(A).\

16 346. Defendants' use of the software/hardware to remotely steal the Exhibit 1 complained of  
17 and to obtain their images constitutes an unauthorized acquisition of stored electronic  
18 communications in violation of the SCA.

19 347. 258. Section 2701(b) of the SCA provides punishment in those instances where the  
20 unauthorized acquisition of stored electronic communications was not done for commercial gain  
21 or advantage of "a fine under this title or imprisonment for not more than six months, or both....  
22 " 18 U.S.C. § 2701(b)(B).

23 348. Defendants actions complained of herein were conscious, intentional, wanton and  
24 malicious entitling Plaintiffs and other members of the Class to an award of punitive damages.

25 349. Plaintiffs and the other members of the Class have no adequate remedy of law for  
26 Defendants continued violation of the CFAA.  
27  
28

1 **16<sup>th</sup> Cause of Action - FALSE IMPRISONMENT (California Jury Instructions – VF-1400.**

2 **False Imprisonment)**

3 350. Plaintiffs repeat and re-allege each and every preceding allegation in paragraphs 1-348 as  
4 if fully set forth herein.

5 351. Defendants, Republic of Liberia, and Shariff without lawful privilege and without filing  
6 criminal charges, confined Dolphin against his will, and preventing him from traveling freely  
7 and thereby confining him as is set forth in paragraphs 1 through 198, on multiple occasions.

8 1. That Shariff and the Republic of Liberia intentionally deprived Dolphin of his  
9 freedom of movement by use of force, threats of force, and unreasonable duress; and,

10 2. That the detention and confinement compelled Dolphin to stay at the Liberia Capital  
11 building in Monrovia, and, prevented him from leaving Liberia on three or more  
12 occasions where for some appreciable time;

13 Dolphin did not knowingly or voluntarily consent to be so confined imprisoned and  
14 detained. Dolphin suffered harm to his mind, body and soul. His psycho was destroyed,  
15 plus, his family life.

16 6. Defendants actions complained of herein were conscious, intentional, wanton and  
17 malicious entitling Dolphin to an award of punitive, compensatory and general damages.

18 According to proof at trial.

19  
20 **17<sup>th</sup> Cause of Action - INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

21 352. Plaintiffs repeat and re-allege each and every preceding allegation in paragraphs 1-351 as  
22 if fully set forth herein.

23 353. The Defendants, each and all, knew that imprisoning Dolphin, publishing false and  
24 misleading information about SLSOM, SL-G, Dolphin and the class, they were abusing their  
25 authority, destroying Plaintiffs' and the Class' reputations and that the Defendants, each and all,  
26 abused positions of authority or a relationship that gave them real or apparent power to affect the  
27 Plaintiffs' and the Class' interests and that these acts would cause plaintiffs emotional harm; and  
28

1 354. The defendants, each and all, knew that they had a right to classify the medical  
2 certification of SLSOM, SL-G, Dolphin, and the Class, each and all, *and* knew that the Plaintiffs  
3 and the Class was particularly vulnerable to emotional distress; and

4 355. Defendants actions complained of herein were conscious, intentional, wanton , willful,  
5 reckless and malicious entitling Plaintiffs and other members of the Class to an award of  
6 punitive, compensatory and general damages according to proof at trial.

7 356. Plaintiffs and the other members of the Class have no adequate remedy of law for  
8 Defendants continued violation of the Plaintiff Dolphin's rights..

9  
10 **18<sup>th</sup> Cause of Action - NEGLIGENCE INFLICTION OF EMOTIONAL DISTRESS**

11 **Plaintiff repeats and re-allege each and every preceding allegation in paragraphs 1-355 as**  
12 **if fully set forth herein.**

13 357. The Plaintiffs and the Class claims that Defendants had a duty to not falsely imprison  
14 Dolphin, publish false information, to research any information of a negative nature before  
15 taking punitive action, like decertifying SLSOM and the class, before doing so, that doing these  
16 acts would have detrimental, lasting, permanent denial of Doctor status to the class, and closure  
17 of SLSOM, therefore causing untold serious emotional distress to Dolphin and the class.

18 358. The defendants breached this duty of fairness in reporting and researching negative  
19 information, before taking punitive action against SLSOM, Dolphin, and the class. The  
20 defendants by breaching this duty caused indescribable harm and emotional distress, including  
21 anguish, fright, horror, nervousness, grief, anxiety, worry, shock, humiliation, and shame to  
22 plaintiffs, which entitles them to punitive damages for this willful, wanton and reckless conduct,  
23 plus, compensatory and general damages in an amount to be awarded according to proof at trial.

24 359. Plaintiffs and the other members of the Class have no adequate remedy of law for  
25 Defendants continued violation of the Plaintiff Dolphin's rights.

1 **19<sup>th</sup> Cause of Action - INTERNET HACKING ( COMPUTER INTRUSION, I.E.**  
2 **HACKING, CYBERTERRORISM, Title 47 USC § 223) Obscene or harassing telephone**  
3 **calls in the District of Columbia or in interstate or foreign communications; and, Title 47**  
4 **USC.§ 230, Protection for private blocking and screening of offensive material.**

5 360. Plaintiffs repeat and re-allege each and every preceding allegation in paragraphs 1-358 as if  
6 fully set forth herein.

7 361. Gollin hacked into SLSOM's website to obtain password protected information and  
8 published the same on his Illinois website, falsely stating that it is also in public domain.  
9 However, court records from federal lawsuit 10-CV-01791-RGK (SHx) Exhibit 1 shows that  
10 this is also a lie presented to the public by Gollin. This is Gollin's attempt at blackmailing  
11 Plaintiffs and the Class and harassing witnesses and victims of his crimes against Dolphin,  
12 SLSOM, SL-G, the Class, and others. Hacking is a violation of Federal and State laws.

13 362. Gollin has taken the liberty to alter the “court documents” as he chooses, he presents on  
14 his website in an effort to make himself look good in the public eye. He altered the documents  
15 to make it seem that he, Gollin, was being victimized by Dolphin and St. Luke . He uses these  
16 documents to terrorize the people listed on Exhibit 45.

17 363. Improper means of acquiring a trade secret or knowledge of a trade secret include, but are  
18 not limited to, [theft/bribery/misrepresentation/breach or inducing a breach of a duty to maintain  
19 secrecy/ [or] wiretapping, electronic eavesdropping, [or] internet hacking (illegal access to  
20 privately or publicly owned computers. Defendant Gollin did not obtain his Exhibit 1 detailed  
21 above by any lawful methods.

22 364. Gollin and Illinois misappropriation of Gollin's purported “ Exhibit 1” caused Plaintiffs  
23 and the Class harm, and their willful and malicious conduct justifies an award of punitive,  
24 compensatory and general damages, the purposes of punitive damages are to punish the  
25 wrongdoers for the conduct that harmed the Plaintiffs and the Class and to discourage similar  
26 conduct in the future. Said damages will be subject to proof at trial.  
27  
28

1 **20<sup>th</sup> Cause of Action - INTERNET STALKING (California Civil Code § 1708.7)**

2 365. Plaintiffs repeat and re-allege each and every preceding allegation in paragraphs 1-363 as  
3 if fully set forth herein.

4 366. The Plaintiffs and the Class claims that Gollin, Schwartz, the Illinois, Contreras and the  
5 ODA violated their right to privacy.

6 367. Gollin, Schwartz, the Illinois, Contreras and the ODA engaged in a pattern of conduct  
7 with the intent to harass the Plaintiffs and the Class.

8 368. As a result of this conduct the Plaintiffs and the Class reasonably feared for their own  
9 safety or for the safety of an immediate family member; and

10 369. As part of the pattern of conduct, Gollin, Schwartz, the Illinois, Contreras and the ODA  
11 made a believable threat with the intent to place The Plaintiffs and the Class in reasonable fear  
12 for their livelihood; and

13 370. The Plaintiffs and the Class clearly demanded at least once that Gollin, Schwartz, the  
14 Illinois, Contreras and the ODA stop; and

15 371. Gollin, Schwartz, the Illinois, Contreras and the ODA persisted in their pattern of  
16 conduct;

17 372. Plaintiffs and the Class was harmed; and Gollin, Schwartz, the Illinois, Contreras and the  
18 ODA's conduct was a substantial factor in causing Plaintiffs and the Class harm.

19 373. "Harass" means a knowing and willful course of conduct directed at The Plaintiffs and  
20 the Class that seriously alarms, annoys, torments, or terrorizes them, and which serves no  
21 legitimate purpose. The course of conduct must be such as would cause a reasonable person to  
22 suffer substantial emotional distress, and must actually cause substantial emotional distress to  
23 The Plaintiffs and the Class. A "pattern of conduct" means a series of words or actions over a  
24 period of time, however short, that reflects an ongoing purpose.

25 374. Defendants actions complained of herein were conscious, intentional, wanton and  
26 malicious entitling Plaintiffs and other members of the Class to an award of punitive,  
27 compensatory and general damages.  
28

1 375. Plaintiffs and the other members of the Class have no adequate remedy of law for  
2 Defendants continued violation of the Plaintiffs' and the Class' rights..  
3  
4

5 **V. PRAYER FOR RELIEF**

6 WHEREFORE, Plaintiff pray for judgment against Defendants, and each of them, jointly and  
7 severally, as follows and appropriate to the particular Causes of Action:

- 8 1. For monetary relief as requested in the Causes of Action as appropriate for the particular  
9 Causes of Action against the Republic of Liberia,
- 10 2. For monetary relief as requested in the Causes of Action as appropriate for the particular  
11 Causes of Action against the NAB of the Republic of Ghana.
- 12 3. For monetary relief as requested in the Causes of Action against ECFMG and FAIMER  
13 to be proven at trial;
- 14 4. For monetary relief as requested in the Causes of action against Gollin in his individual  
15 and official capacities.
- 16 5. For monetary relief as requested in the Causes of Action against Schwartz in his  
17 individual and official capacities.
- 18 6. For monetary relief as requested in the Causes of Action against the Illinois.
- 19 7. For Monetary relief as requested in the Causes of Action against Contreras in his  
20 individual and official capacities.
- 21 8. For Monetary relief as requested in the Causes of Action against the ODA.
- 22 9. For pre- and post-judgment interest;
- 23 10. For Punitive damages as appropriate for the particular Causes of Action against all  
24 defendants;
- 25 11. For restoration of SLSOM on the International Medical Education Directory;
- 26 12. For removal of St. Luke School of Medicine from the State of Oregon "diploma mill"  
27 list;  
28

1 13. For removal of St. Luke School of Medicine from the "diploma mill" list of other states  
2 and territories that use the State of Oregon's "Diploma Mill" list;

3 14. An Equitable ruling on the Constitutionality of "diploma mill" lists and similar other  
4 restrictive lists that preclude educational and employment rights and opportunities for  
5 law-abiding citizens who have otherwise acquired the education, training, and  
6 examination qualifications for employment;

7 15. An Equitable ruling on the Constitutionality that employees of the Oregon state  
8 governments, specifically, the ODA, cannot apply laws and regulations outside of their  
9 own state in any matter of law, order, citizenship, or rights of that state not expressly  
10 written in the Constitution of the United States without express written permission of any  
11 other state or country to any person, institution, or corporations outside of that state, and  
12 therefore cannot violate the civil rights of any individual, institution, or corporation  
13 outside of their own states.

14 16. For attorneys' fees and costs of suit pursuant to, inter alia, the common fund and private  
15 Attorney General doctrines, California Code of Civil Procedure section 1021.5 and/or the  
16 statutory Causes of Action asserted herein, as may be appropriate;

17 17. and, for such other and further relief as this Court may deem just and proper.

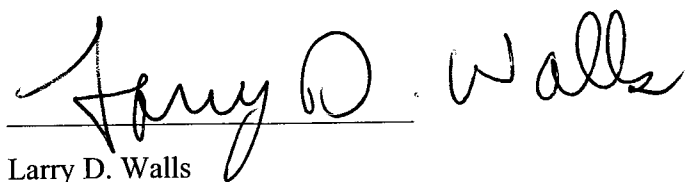
18 ////

19 DEMAND FOR JURY TRIAL

20 Plaintiff demands a trial by jury on all claims so triable and an advisory jury for a factual  
21 determination on all equitable claims.

22  
23 Respectfully Submitted

24 February 2, 2012

25   
26  
27

Larry D. Walls

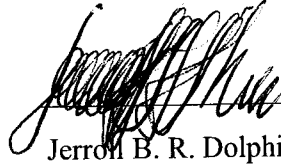
28 Attorney for the Plaintiffs and the Class

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VERIFICATION

I have read the foregoing and certify, under the penalty of perjury under the laws of the State of California that the foregoing is true and correct and was executed in Los Angeles, California.

Dated: February 2, 2012



\_\_\_\_\_

Jerrold B. R. Dolphin

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## **Exhibit A – Members of the Class-Action**

<b>No.</b>	<b>Name</b>	<b>Country/State</b>
1	Dr. Robert S. Farmer, Jr	Maryland
2	Suleiman Adekunle Omipidan	Nigeria
3	Pauline Ugochi Chilaka	Nigeria
4	Raymond Y Ofori	United Kingdom
5	Dr. Muhammed A.S.M. Al-Anzi	Saudi Arabia
6	Dr. Sid R. Rogers	Colorado
7	Dr. Karriem S. Watson	Illinois
8	Dr Emmanuel Okoye	Canada
9	Dr. Keith Patrick Steinhurst	Texas
10	Dr. David Belshaw	California
11	Linda Halisky	New York
12	Joseph Aiyegbusi	Nigeria
13	Ken Jordon	South Carolina
14	Larry Lammers	Michigan
15	Dr. O. B. G. Nmorsi	Nigeria
16	Dr. Gbenga Gbayerola	Nigeria
17	Dr. Pius Ndubisi	Nigeria
18	Dr. Godwin Okonkwo	Nigeria
19	Dr. Chijioke Ejiogu	Nigeria
20	Steve Monday	Nigeria
21	Dr. Robin Ellsworth	Illinois
22	Dr. Miklos Major, III	Texas
23	Dr. Amin Sain	United Kingdom
24	John Toluwani Oladele	Nigeria
25	(Redacted)	Georgia
26	Darlington Esemuze	South Africa
27	Victoria Ofele	Nigeria
28	Dr. Mary Hulve	New Jersey
29	Dr. Michael Hejazi	New Jersey
30	Dr. Peter Kolosky	Conneticut

<b>No.</b>	<b>Name</b>	<b>Country/State</b>
31	Dr. Laurie Berg Kolosky	Conneticut
32	Dervanna Troy Mckoy	New York
33	Armand Dixon	Tenneseec
34	Carroll Braddy	Georgia
35	Christopher Sauda	Nigeria
36	Chukwuyem Obia	Nigeria
37	Dr. David Fyles	United Kingdom
38	Debrah Berger	New York
39	Felicia Jatto	Nigeria
40	Robert Hayes	Kentucky
41	Dr. James Kyle	Ohio
42	Robert Irving	Kentucky
43	Dr. Jason Payor	Florida
44	Dr. Jerry Charles	Kentucky
45	(Redacted)	Florida
46	M. C. K. Madubuike	Georgia
47	(Redacted)	Florida
48	(Redacted)	Maryland
49	(Redacted)	Illinois
50	Rebecca Hopkins	New York
51	(Redacted)	France
52	(Redacted)	Michigan
53	Dr. Yuri Soyferman	California
54	Dr. Antwi Boakye	Maryland
55	Dr. Astara Burlingame	Washington
56	(Redacted)	Texas
57	Dr. Joan Nielsen	North Carolina
58	Withdrawn	
59	Dr. Mathew Skaria	California
60	Dr. Peace Jessa	Kentucky
61	Dr. Rita Patangia	Arkansas
62	Does 1 - 100	Various state and nations



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# Exhibit 1 – W.H.O. Letter from Ministry of Health, August 2000

FROM : LIBTELCO MONROVIA

PHONE NO. : 231 227 838

AUG. 19 2000 11:05AM PL



## REPUBLIC OF LIBERIA MINISTRY OF HEALTH & SOCIAL WELFARE

P.O. BOX 10-6008  
1000 MONROVIA, 10 LIBERIA  
WEST AFRICA

OFFICE OF THE MINISTER

MH&SW/GOL/PSC-M/1255/00/RL

August 15, 2000

Ms. Sandra Dumsoat  
HDP ASU/HQ  
World Health Organization  
CH-1211, Geneva 27,  
Switzerland

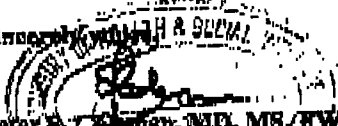
Dear Madam:

This is to certify that the Government of Liberia has accredited the St. Luke School of Medicine to operate within the Republic of Liberia. This Medical School will grant four-year Doctor of Medicine (MD) and is regulated through the Ministry of Health.

The date of accreditation is effective August 1, 2000.

It is our hope that this information will be useful and that all necessary courtesies will be accorded the above mentioned medical school.

Kind regards.

Sincerely,  
  
Peter A. Coleman, MD, MS, FWACS  
MINISTER

# Exhibit 2 - PERMIT TO OPERATE ISSUED SEPTEMBER 2002

ST. LUKE SCHOOL OF MEDICINE PHONE NO. : 1 210 419 3904 FAX : 07 000

TRM : LTC TRAFFIC DEPT PHONE NO. : 231 227 614 EXT. : 24 2002 09:51



Republic of Liberia  
**NATIONAL COMMISSION OF HIGHER EDUCATION**  
P. O. Box 2014; Tel: 225480  
Monrovia, Liberia, West Africa



OFFICE OF THE EXECUTIVE DIRECTOR

September 17, 2002

## TEMPORARY PERMIT TO OPERATE ST. LUKE SCHOOL OF MEDICINE IN THE REPUBLIC OF LIBERIA

Having met the Minimum Criteria set for by the National Commission of Higher Education to operate a higher education institution in the Republic of Liberia, the St. Luke School of Medicine is hereby granted this Temporary permit to operate in the City of Monrovia, Montserrado County, in the Republic of Liberia.

This Temporary Permit of operation is valid for a period of two calendar years (September 2002 - September 2004).

Renewable September 17, 2004



Approved:

*Lawrence S. Bestman*  
Lawrence S. Bestman, Ph. D.  
EXECUTIVE DIRECTOR

# Exhibit 3 - PRESIDENT SIGNS SLSOM CHARTER ACT AUGUST 2003

Please note the "Act to Incorporate SLSOM" is on the same bill that includes the raw diamond, "blood diamond", legislation that lifted United Nations sanctions from Liberia in August 2003.



## REPUBLIC OF LIBERIA

OFFICE OF THE PRESIDENT

August 7, 2003

The Honorable  
The Liberian Senate (IN SESSION)  
Capitol Building  
Monrovia

Ladies and Gentlemen,

I have the honor to inform that the following Acts of Legislature entitled

"AN ACT AMENDING THE NEW MINERALS AND MINING LAW PART I ENTITLED 23, L.C.R. BY ADDING THERE TO A NEW CHAPTER 40 PROVIDING FOR CONTROL ON THE EXPORT AND IMPORT AND TRANSIT OF ROUGH DIAMOND".

"AN ACT CREATING THE CITY OF FOYA WITHIN FOYA ADMINISTRATIVE DISTRICT, LOFA COUNTY, R.L.".

"AN ACT TO INCORPORATE ST. LUKE SCHOOL OF MEDICINE AS ONE OF THE OF THE CITY OF MONROVIA, MONTSERRADO COUNTY, REPUBLIC OF LIBERIA, AND TO GRANT SLSOM A CHARTER".

"AN ACT CREATING MROO STATUTORY DISTRICT WITHIN MARGIBI COUNTY WHICH CONTAINS THREE COUNTY DISTRICTS, MAMBAIN FAAMINGTON, KARBAL AND FIVE CHIEFDOMS RESPECTIVELY WITH A PROVISIONAL MONTHLY AND PROBATE COURT MAJESTRIAL AREA AND PROVIDING FOR SAME".

have today received Executive Approval

Cordially,

A handwritten signature in black ink, appearing to read "Charles D. Taylor".

## **Exhibit 4 - LIBERIA EMBASSY WEBSITE DISCLAIMER**

**REPUBLIC OF LIBERIA**  
**NATIONAL COMMISSION OF HIGH EDUCATION**  
**Fourth Floor, Room 407**  
**MINISTRY OF EDUCATION**  
**P. O. Box 9014**  
**Monrovia , Liberia , West Africa**

### **URGENT DISCLAIMER ON THE ILLEGAL ESTABLISHMENT AND RECOGNITION OF HIGHER EDUCATION INSTITUTIONS IN THE REPUBLIC OF LIBERIA**

In order to establish a Higher Education Institution in Liberia , there are two sets of requirements: One set of requirements relates to obtaining a charter to operate from the National Legislature. The other set of requirements has to do with conformity to policies as set by the National Commission on High Education. One stipulation in these policies is that institutions seeking to be established in Liberia must meet the requirements as set out in the policy, prior to obtaining charters from the National Legislature. The policy clearly provides guidelines regarding the establishment and operation of high education institutions in the Republic of Liberia . These policy guidelines are currently available at the Commission's Secretariat.

On the contrary, the National Commission on High Education has observed with dismay that some colleges or universities have been established without going through the proper channels. For one thing charters have been granted institutions without prior clearance from the National Commission on High Education. In other cases, several institutions appear to have obtained operational permits or statements of recognition to establish and operate in the country. However, some of these documents were exclusively signed by the former Executive Director of the past administration without the approval of the Commission. Hence, the Permit signed without the approval of the Chairperson is considered invalid, and any institution in possession of such permit is not recognized by the appropriate authorities of the Commission.

Particular references are made to the St. Regis University and St. Luke Medical College that fall in this category. The St. Regis University has publicly made known to the World that it has a legal status to operate in Liberia through the permission of the Commission on High Education. This is not true. Evidence suggests that whatever documents the University claims to have obtained from the Commission were never approved by the Commission and do not bear the signature of the Chairperson. Further, these two institutions are considered Distance Education Institutions and according to the Commission's policy:

*Institutions that are distance education-related and that have approached the National Commission on Higher Education for the operation in Liberia are being processed. Since this is a new area of exploration for the Commission, the public is advised that any decisions already reached reference these Institutions are tentative and that the Commission is continuing its deliberations on these Institutions to final conclusions vis-à-vis their place in the Liberian Higher*

*Education System.*

Accordingly, the National Commission on Higher Education, Republic of Liberia , hereby declares **null and void** whatever documents St. Regis University may claim to possess emanating from the Commission until at such time when authorities of the Institution can go through the proper procedures for accreditation.

As regards the St. Luke Medical College, evidence also shows that no such college exists in Liberia ; therefore, it cannot claim to have obtained accreditation from the Commission. The Commission also nullifies the existence of such an institution in Liberia , until such time as all pertinent requirements as noted above are met. It therefore goes without saying that similar notice is being sent our to all institutions which are making claims similar to St. Regis and St. Luke that have not met the requirements as herein noted.

Signed: Isaac Roland, Ed,D. (**DIRECTOR GENERAL**)

Approved: D. Evelyn S. Kandakai, Ed,D. (**CHAIRPERSON**)