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IN THE FIFTH JUDICIAL DISTRICT COURT OF WASHINGTON COUNTY
STATE OF UTAH

ROBERT B. LICHFIELD

Plaintiff,

vs.

INTERNATIONAL SURVIVORS
ACTION COMMITTEE, Inc., SHELBY
EARNSHAW, WILLIAM
EARNSHAW

Defendants.

COMPLAINT AND JURY DEMAND

Civil No.

Judge

Plaintiff Robert B. Lichfield through Silvester & Conroy, L.C. his counsel of record for a cause of action complains and alleges as follows:

FACTS COMMON TO ALL CLAIMS

1. Plaintiff is a resident of Washington County, Utah.
2. Defendants International Survivors Action Committee, Inc. ("ISAC") is a Florida Corporation.
3. Shelby Earnshaw is a resident of Virginia and director of ISAC.
4. William Earnshaw is a resident of Virginia and chief financial officer of ISAC.

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4. William Earnshaw is a resident of Virginia and chief financial officer of ISAC.
5. The actions giving rise to plaintiff's causes of action occurred in the States of Utah and Missouri.
6. ISAC through its agents visited Utah with intent to invade the privacy of plaintiff, with intent to interfere with Plaintiff's business relationships, and with intent to interfere with Plaintiff's prospective economic relationships.
7. Defendants have contacted governmental officials in states including Utah, and Missouri for purpose of damaging plaintiff in Utah.
8. Defendants intentionally, or in reckless disregard of the truth, have published false, defamatory and misleading information about plaintiff, on the internet, to business and public officials in any state where they believe plaintiff does or intends to do business, specifically in Utah and Missouri.
9. Defendants' false, defamatory and misleading publications include but are not limited to claims plaintiff has violated criminal laws, and abused or molested children.
10. Defendants' false, defamatory and misleading publications include but are not limited to claims plaintiff's business practices violate the law.
11. Defendants or their agents visited Utah, searched through trash cans, conducted secret surveillance at locations they expected to observe plaintiff, trespassed on private property, talked

with members of plaintiff's community, in violation of plaintiff's privacy.

12. Defendants gathered private business records from the trash at facilities where plaintiff had business relations, took photos of private locations all with the intent to gather materials that might be used to damage plaintiff's business relations.

13. Defendants contacted public officials in Boonville Missouri, and Salt Lake City, Utah and spread false, defamatory and misleading information about plaintiff with the intent to interfere with plaintiff's business relations and with plaintiff's prospective economic interests.

14. Plaintiff has negotiated to purchase real estate in Boonville Missouri and during those negotiations plaintiff became aware that defendants Earnshaw personally and in behalf of ISAC contacted police, city officials and members of the community claiming plaintiff abused children. operated businesses in violation of the law, had been convicted of crimes. These allegations are false.

15. Defendants have also contacted public officials in the State of Utah, claiming plaintiff is a child abuser, and is guilty of other crimes, all of which are false.

16. On information and belief, Defendants have contacted public officials in New York, Iowa, South Carolina, Georgia, and Montana and falsely accused plaintiff of illegal conduct with the specific intent to damage business relations plaintiff has with residents of those states.

17. Defendants know plaintiff is a resident of Utah with his principle place of business in Utah, and have intentionally directed all their actions to cause plaintiff damage in Utah.

information that might be used to interfere with plaintiff's business relations.

27. Defendants or their agents visited Washington County, Utah; Rich County, Utah; Salt Lake County, Utah attempting to gather such information.

28. Defendants or their agents attempted to get lists of plaintiff's business contacts, potential customers, business associates, and to get information regarding property owned, banking relationships, and other protected and proprietary information to use in convincing people not to do business with plaintiff.

29. Defendants in their contacts with public officials in Missouri, Utah and elsewhere, invaded plaintiffs' privacy by publishing false information of a highly offensive nature, knowing it to be false or acting in reckless disregard as to its falsity with the intent to place plaintiff in a false light with those public officials.

29. Plaintiff is entitled to damages for this invasion of privacy and for injunctive relief prohibiting defendants and their agents from further invasions of plaintiff's privacy, personal property, or businesses and enjoining them, and each of them from publishing false information placing plaintiff in a false light.

30. Plaintiff is entitled to punitive damages to punish and deter defendants willful, malicious, and reckless misconduct.

THIRD CAUSE OF ACTION

Intentional interference with prospective economic advantage

for cost and attorney's fees as allowed by law;

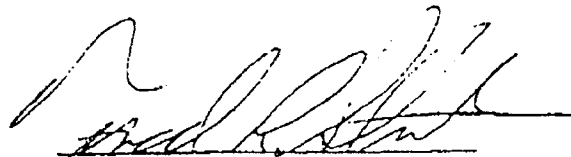
for punitive damages;

and for such other and further relief as is just.

Plaintiff demand a jury trial on all issues triable to a jury.

DATED this 22 day of February, 2005

Silvester & Conroy, L.C.

A handwritten signature in black ink, appearing to read "Fred R. Silvester", written over a horizontal line.

Fred R. Silvester
Spencer C. Siebers
Attorneys for Plaintiff