IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

LOUIS B. ANTONACCI, Plaintiff **v.** **RAHM ISRAEL EMANUEL et. al.** Defendants.	**Case No. 1:26-cv-00211**

PLAINTIFF'S MEMORANDUM IN OPPOSITION TO
DEFENDANTS' RULES 12(B)(6) AND 12(B)(1) MOTIONS TO DISMISS

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INTRODUCTION

Plaintiff Louis B. Antonacci ("Antonacci") hereby files this Memorandum in Opposition to the Motions to Dismiss the Complaint, pursuant to Rules 12(b)(1), 12(b)(5), and 12(b)(6), filed by Defendants Lane Construction Corp. ("Lane") and Seth T. Firmender's ("Firmender") (together "Lane Defendants") (dkt. 28), Perkins Coie LLP ("Perkins Coie"), Matthew J. Gehringer ("Gehringer"), Anita J. Ponder ("Ponder"), and Seyfarth Shaw LLP (together "Perkins Defendants") (dkt. 51), Storij, Inc. d/b/a Driggs Research International d/b/a STOR Technologies d/b/a The So Company ("Storij") (dkt. 38), Holland & Knight LLP ("Holland & Knight") (dkt. 46), Rokk Solutions LLC ("Rokk") (dkt. 49), Descrybe, LLC ("Descrybe") (dkt. 44)[1], and 9208 Lee Avenue, LLC and Parrish Law Firm, PLLC (together "Parrish") (dkt. 41). Defendant Rahm Israel Emanuel ("Emanuel") did not file his own motion to dismiss, but instead opted to file joinder. (Dkt. 55).

While this Opposition endeavors to address all arguments made by the defendants in their respective motions, Antonacci expressly disputes all arguments made by the defendants that are inconsistent with Antonacci's arguments set forth herein. Antonacci will not address every case, statute, rule and regulation cited by the Defendants, because many simply do not merit discussion, but Antonacci seeks to address all their arguments in this Opposition.

SELECTED CORRECTIONS OF DEFENDANTS' FACTUAL MISSTATEMENTS

For the sake of brevity, and because Antonacci needs to file a combined response in light of the time constraints imposed, Antonacci will not recite his allegations in narrative format here. Antonacci's allegations are discrete and well organized and can be easily understood by any court of competent jurisdiction. Defendants entertain us with theatrics that ignore Antonacci's clearest

[1] Descrybe also disputes personal jurisdiction and venue under Rules 12(b)(2) and 12(b)(3), which Antonacci addresses in a separate opposition.

allegations and muddle the rest. Antonacci endeavors to rebut and dismantle their arguments as quickly and cleanly as possible, so he will address the allegations as needed throughout this opposition.

That said, there are some factual misstatements that must be clarified. The Lane Defendants claim that Antonacci began work for Holland & Knight in 2018. That is incorrect; Antonacci worked for Holland & Knight from 2008 to 2010. The Katz Fraud Case took place in 2009.

Descrybe claims that Antonacci is a lawyer from Virginia who moved from Newark, Delaware, after filing his complaint for defamation against Descrybe in August 2025. Antonacci currently lives in the District of Columbia and has never lived in Delaware.

Parrish claims that Antonacci's law license is suspended in Maryland. That is not true. Parrish claims that Stephen B. Shapiro works or worked at Sheppard Mullin LLP. That is not true. Stephen Shapiro is a partner in the Washington, DC office of Holland & Knight who has presided over the decline and likely imminent disappearance of that firm's DC construction law practice. Parrish further claims that Antonacci was asked to resign from Holland & Knight because he was engaged in an inappropriate relationship with his colleague and ex-wife. Parrish is again incorrect, but we need not dither here.

ARGUMENT

I. ANTONACCI'S FEDERAL CLAIMS ARE NEITHER INSUBSTANTIAL NOR FRIVOLOUS

Defendants argue, yet again, that this Court does not have subject matter jurisdiction over this case, under 28 U.S.C. §1331, because Antonacci's claims under federal law are insubstantial and frivolous, and thus Antonacci should be denied access to this federal court pursuant to Rule 12(b)(1). The analysis for whether Antonacci has stated claims under federal law follows essentially the same analysis as defendants' motions under Rule 12(b)(6) for failure to state a

claim, so Antonacci will only briefly discuss this issue here because it is a waste of everyone's time, which is the entire legal strategy employed by this Zionist criminal enterprise.

At the outset, Antonacci must point out here, and he will repeat this throughout this Opposition, that Antonacci has testified as to the truth of almost all the allegations set forth in this complaint:

> 23. It must be noted now, and will be emphasized later, that in the disciplinary trial that took place in Circuit Court for the City of Alexandria on June 11, 2025, Antonacci testified on his own behalf as to the truth of everything alleged in his complaint in *Antonacci v. Rahm Israel Emanuel*. He entered his EDVA complaint into evidence in his case, together with all eleven exhibits, his briefs and affidavits in the Fourth Circuit Appeal, his petition for writ of certiorari in *Antonacci v. City of Chicago*, and additional incriminating email correspondence with Johnson, Storij, and Shaun So. As such, there are literally reams of evidence supporting Antonacci's claims, including the transcript of the disciplinary trial that he filed with the Circuit Court for the City of Alexandria on September 29, 2025.

(Dkt. 1 ¶23.) Antonacci has separately requested this Court take judicial notice of the June 11, 2025 hearing transcript, which was a public hearing and became a matter of public record when Antonacci filed it on September 29, 2025. (*See* Dkt. 68-1.) And as Lane's counsel submitted in her affidavit to this Court, "[o]f the 672 numbered paragraphs contained in the Complaint in this action, 462 are identical to paragraphs in the EDVA Complaint including typographical or grammatical errors." (Dkt. 28-4 ¶5.) Of course, all of these counsel's self-serving affidavits ignore the eleven exhibits Antonacci attached to the EDVA complaint (dkt. 68-2), as well as the Declaration Antonacci attached to the instant complaint. (Dkt. 1-1.) In any event, there is already substantial evidence supporting Antonacci's claims, as alleged in this complaint, and therefore must be accepted as true.

Antonacci raises this issue because it completely eliminates the Zionists' most treasured, albeit specious argument, both in these proceedings and in response to the public's sharply rising

awareness of their toxic impact on U.S. and global institutions: That somehow there is no evidence supporting the allegations against them. In this case, there are already reams of evidence against them. And while the Zionist defendants and their Zionist lawyers will surely continue pretending that they cannot read, this Court can read and it understands the allegations.

Antonacci is not asking for any special treatment. He is asking this Court to fulfill its role, envisioned by Article III of the U.S. Constitution, Title 28 of the U.S. Code, and nine centuries of common law, to accept all of Antonacci's well-pleaded allegations and their reasonable inferences as true, to which Antonacci himself has already testified under oath.

Antonacci's RICO claims are not frivolous because he has plainly alleged that the defendants are part of an enterprise that engaged in a pattern of racketeering activity, through innumerable predicate acts, that has caused, and continues to cause, Antonacci both economic and physical injuries. Antonacci has also quite plainly alleged that all defendants knowingly and willingly agreed to join this conspiracy to attack Antonacci because his contempt for corruption and incompetence is a distinct threat to Zionist totalitarianism.

Defendants' reliance on this Court's recent decision in *Andreski v. Dep't of Just.*, No. CV 25-2977 (LLA), 2026 WL 445648, at *1 (D.D.C. Feb. 17, 2026) is misplaced. In *Andreski*, the plaintiff alleged a conspiracy of "various unnamed individuals engaged in 'harmful terrorizing racketeering retaliation attacks,' including, among other things, spying on Mr. Andreksi with drones, impeding his rehabilitation and medical treatment, and subjecting him to searches by women apparently wearing the uniforms of court security officers and working in federal courthouses as a 'ruse.'" *Id*. (internal citations omitted). Not only was this Court unable to determine whether, if true, the plaintiff's allegations entitled him to relief, but the defendants were not put on fair notice of the claims against them. *Id*.

In stark contrast, Antonacci has alleged, in detail, the who, what, when, where, why and how of the defendants' scheme against him, which began with Antonacci's successful identification and prosecution of civil RICO claims against another criminal Zionist attorney in 2009. (Dkt. 1 ¶¶29-72.) Indeed, if the Defendants admit the factual allegations against them, then there is no question concerning their liability for the claims alleged.

Relatedly, Antonacci served discrete requests for admission on a few of the key defendants, simply asking them to admit or deny a few of the key allegations. (Dkt. 34.) This Court granted their request for a protective order, as did the Eastern District of Virginia, although Antonacci filed a motion for reconsideration here. (Dkt. 35.) If this Court is genuinely interested in the truth of Antonacci's allegations, then it should require them to answer those discrete requests for admission. The documents Antonacci asked to be authenticated with respect to Lane and Firmender, were attached to Antonacci's 2024 complaint in the EDVA, and Antonacci entered them in to evidence in his Disciplinary Trial on June 11, 2025. (*See* Dkt. 68-2 (Exs. F, G, H, J).)

The Defendants' reliance on *Carmichael v. Pompeo*, 486 F. Supp. 3d 360 (D.D.C. 2020), aff'd in part, appeal dismissed in part sub nom. *Carmichael v. Blinken*, No. 23-5111, 2024 WL 2768384 (D.C. Cir. May 30, 2024) is laughable. There the Plaintiffs made a RICO claim based solely on the requirement that they provide their social security numbers to renew their passports. Not exactly an apt comparison.

Jean-Baptiste v. U.S. Dep't of Just., No. 1:23-CV-02298 (TNM), 2023 WL 8600569 (D.D.C. Dec. 12, 2023) is not a RICO case and the Court's brief discussion of the allegations certainly make them seem crazy. Antonacci's allegations are reasonable, plausible, and well organized, which is further demonstrated by the defendants' desperate and pathetic pleas for protective orders. But at least the plaintiff in Jean-Baptiste was allowed to file an amended

complaint, something Antonacci has been denied by both previous district courts. Maybe it is just time to stop pretending that Zionists could ever been involved in a bona fide system of justice. And the Defendants' reliance on *McBrien v. U.S.*, 2010 WL 9498618 (D.D.C. 2010) is just pointless–the unpublished opinion, two paragraphs in length, speaks only in categorical terms that the allegations are fantastic and incredible. Antonacci's allegations are not only plausible, but true, as demonstrated by the vitriol of the Jewish judges who previously dismissed his complaints with prejudice. Antonacci just hits too close to home.

It is not clear to which of its rambling and mindless arguments Descrybe applies its contention that its entire website is incorporated into the complaint, but that argument falls under its own weight. Is the entire internet incorporated into Antonacci's complaint as well? Do we know when the content Descrybe argues should be incorporated into the complaint was published on its website? Of course not, but little of what Descrybe has to say makes any sense. Descrybe has not requested that this Court take judicial notice of their website because Antonacci does not contend that everything posted on Descrybe's website is true.

In fact, Antonacci specifically contends that the defamatory material posted concerning Antonacci was not generated by artificial intelligence, as Descrybe's website contends, but rather was written and published deliberately by principals or employees of Descrybe, and with malicious intent. (Dkt. 1, ¶¶492-6, 523.k-l, 550.j, 614, *inter alia*.) Indeed, the case relied upon by Descrybe expressly cautions against allowing defendants to pile on extrajudicial documents because it can led to "premature dismissal of plausible claims," but was inclined to do so nonetheless because "the [complaint] survives [defendant's] motion to dismiss whether or not these materials are considered." *Real World Media LLC v. Daily Caller, Inc.*, 744 F. Supp. 3d 24, 31–32 (D.D.C. 2024)

Antonacci further stated a claim for conspiracy against his civil rights, under 18 U.S.C. §1985(3), because he was deprived of his constitutional right to substantive due process of law by being subject to forfeiture of his bar license for conduct that no reasonable attorney or layperson could have been on notice violated the Virginia rules of professional conduct. Because no other Virginia attorney had ever been subject to such an absurd prosecution, Antonacci was uniquely denied equal protection of his constitutional rights and is therefore a protected class of one, like Perkins Coie. *Perkins Coie LLP v. U.S. Dep't of Just.*, 783 F. Supp. 3d 105, 166 (D.D.C. 2025); *see* Section IX *infra*. This unconstitutional attack by these Zionist fanatics is consistent with the goals of this criminal conspiracy, and all defendants are therefore liable for the damages Antonacci incurred.

Antonacci has also alleged repeated and ongoing violations of 18 U.S.C. §1030, which cannot be time-barred at this pleading stage. Antonacci's federal claims are therefore neither insubstantial nor frivolous so this Court has subject matter jurisdiction under 28 U.S.C. §1331.

This Court may exercise supplemental jurisdiction over Antonacci's state law claim regardless. *Ajenifuja v. Dangote*, 485 F. Supp. 3d 120, 128–29 (D.D.C. 2020), aff'd, No. 20-7082, 2021 WL 11560308 (D.C. Cir. Feb. 5, 2021).

II. ANTONACCI HAS COMPLIED WITH RULES 8(A) AND 9(B) WHILE ALLEGING A 15-YEAR CRIMINAL CONSPIRACY PERPETRATED BY ZIONIST LAWYERS, IN A MANNER THAT IS SHORT, PLAIN, AND SUFFICIENTLY DETAILED, WHILE ESTABLISHING PLAUSIBILITY BY CONNECTING THE DEFENDANTS AND SHOWING QUID PRO QUOS WHERE POSSIBLE

This is always a fun one. Like Goldilocks, the defendants and three previous federal courts either find Antonacci's allegations too detailed, and therefore violating Rule 8(a), or not detailed enough, and therefore violating Rule 9(b). According to them, Antonacci cannot get it just right.

The Zionists are trying to create an impossible standard for pleading civil RICO. It is important to reiterate that Antonacci specifically pleads this as part of his definition of this criminal Zionist enterprise:

> 517. Specifically, the enterprise is an association-in-fact among individuals and business entities designed to divert taxpayer money to members of the enterprise; destroy the professional reputation of anyone who seeks to expose the nature and extent of the enterprise through fraud, widespread defamation, and murder; protect the members of the enterprise from civil liability by unlawfully influencing the outcome of civil cases, thereby keeping more money in the enterprise; defrauding litigants from monies to which they are legally entitled by unlawfully delaying and sabotaging meritorious civil cases; bribing and otherwise incentivizing people associated with those deemed enemies of this enterprise to spread lies about those "enemies;" punishing attorneys who sue members of the enterprise by preventing them from becoming admitted to practice law; punishing attorneys who sue members of the enterprise by putting them on the Blacklist of disfavored attorneys; illegally infiltrating protected computers to spy on the "enemies" of the enterprise, in some cases through fraudulently obtained search warrants; and protecting the enterprise by unlawfully preventing them from obtaining evidence of the enterprise's fraudulent misconduct.
>
> 518. The enterprise is administered and funded primarily by Zionists and Jews, but they will utilize anyone they can bribe or extort to accomplish their goals.

(*See. e.g.*, Dkt. 1 ¶¶517-18, 540-41.) The Zionists have captured enormous wealth through fraud and racketeering, and now they seek judicially imposed tort reform to prevent civil plaintiffs from recovering damages, through civil RICO, resulting from the Zionists' racketeering activity. This will be discussed further below, but it runs directly counter to the express purpose of civil RICO, which is meant to encourage RICO enforcement by private citizens, as recognized by the U.S. Supreme Court. *Sedima, S.P.R.L. v. Imrex Co.*, 105 S.Ct. 3275, 3280–81(1985).

Relatedly, and not surprisingly, Defendant BEAN LLC d/b/a Fusion GPS, the geniuses behind the Steele Dossier and Russia Collusion Hoax, have again taken a default in this case. (Dkt.

63.) Clearly their records on Antonacci, a private citizen, would send their principals and co-conspirators to federal prison where they belong. And those files will be subpoenaed.

And as Antonacci alleged in the Complaint (dkt. 1 ¶¶497-98), Antonacci filed a civil suit for defamation against Descrybe on August 29, 2025. Seventh months later, and five months after Descrybe's motion to dismiss was fully briefed, that case has not progressed in any way except to be referred to a magistrate judge, who lacks statutory authority to rule on Descrybe's motion to dismiss. 28 U.S.C. §636(b). (*See* Dkt. 68-3.) Antonacci has filed a motion to expedite the case, a motion for electronic filing privileges, and has called chambers every week, but to no avail. As Antonacci alleged in the complaint, his case against Descrybe in Delaware further demonstrates that this Zionist criminal enterprise is just that: a Zionist criminal enterprise that has undo influence on the American justice system. (Dkt. 1 ¶¶474-75, 517-18, 540-41.) But we digress.

Antonacci's complaint complies with Rules 8(a) and 9(b) because he has struck the proper balance of providing sufficient detail to demonstrate the plausibility of his allegations, the relationships between the defendants, and the benefits gained from their participation in the criminal enterprise, where possible. Antonacci has further provided as much detail as possible, at this stage of the proceeding, with respect to his allegations of mail and wire fraud, as further discussed below. *See* Section VII.d. *infra*. Recall that, as alleged in the complaint, Antonacci provided eleven substantiating exhibits, much of which were copies of correspondence related to the AECOM Fraud, yet District Judge Mike Nachmanoff nonetheless claimed those allegations were preposterous.

Antonacci's allegations all have evidentiary support through either direct evidence or reasonable inferences based on direct evidence. *See also* Section VI.a., *infra*. The allegations made on upon reasonable inference will likely have direct evidentiary support after a reasonable

opportunity for further investigation and discovery, pursuant to Rule 11(b)(3). To that end, Antonacci promptly served upon a few key defendants discrete requests for admission that are neither burdensome nor prejudicial. (dkt. 34.) Indeed, when the U.S. Supreme Court clarified accrual of the statute of limitations period for civil RICO, it expressly relied upon established jurisprudence for "relaxing particularity requirements of Rule 9(b) where RICO plaintiff lacks access to all facts necessary to detail claim." *Rotella v. Wood*, 528 U.S. 549, 560 (2000) (citing, e.g., *Corley v. Rosewood Care Center, Inc. of Peoria*, 142 F.3d 1041, 1050–1051 (C.A.7 1998)).

In short, Antonacci's allegations are neither too long nor insufficiently detailed. They are just right for a private citizen alleging the heinous misconduct perpetrated by the insidious criminal enterprise alleged in the complaint.

III. THERE IS NO CLAIM PRECLUSION OR RES JUDICATA BECAUSE THERE HAS NEVER BEEN ANY ADJUDICATION ON THE MERITS

"At common law dismissal on a ground not going to the merits was not ordinarily a bar to a subsequent action on the same claim." *Costello v. United States*, 365 U.S. 265, 285 (1961). A dismissal for lack of subject-matter jurisdiction is not a judgment on the merits, and thus res judicata does not apply. *Hughes v. United States*, 71 U.S. 232, 237 (1866) ("In order that a judgment may constitute a bar to another suit, it… must be determined on its merits. If the first suit was dismissed for… the want of jurisdiction, … the judgment rendered will prove no bar to another suit.")[2]

[2] This is still the rule. *See, e.g.*, *Prakash v. Am. Univ.*, 727 F.2d 1174, 1182 (D.C. Cir. 1984) ("A dismissal for lack of subject-matter jurisdiction . . . is not a disposition on the merits and consequently does not have res judicata effect." (footnotes omitted)); *see generally* Restatement (Second) of Judgments § 20 (1982) ("A personal judgment for the defendant, although valid and final, does not bar another action by the plaintiff on the same claim . . . When the judgment is one of dismissal for lack of jurisdiction."). The principle that dismissal for lack of jurisdiction is not a judgment on the merits entitled to claim preclusion is also embodied in Federal Rule of Civil Procedure 41(b), which provides: "Unless the dismissal order states otherwise, a dismissal under this subdivision (b) and any dismissal not under this rule—except one for lack of jurisdiction, improper venue, or failure to join a party under Rule 19— operates as an adjudication on the merits." Fed. R. Civ. P. 41(b) (emphasis added)); *see Costello*, 365 U.S. at 286 ("We do not

Counsel for defendants were not only absent the day they taught law at law school, but they also failed to read the cases cited for the proposition that this case is barred by claim preclusion and/or res judicata. Each of those cases stands for the very simple and well accepted proposition that res judicata and claim preclusion only apply to adjudications on the merits. As alleged in the complaint, and as set forth in the unpublished vitriol relied upon and parroted by the defendants, this case has never been adjudicated on the merits because both of Antonacci's previous federal cases were dismissed for want of subject matter jurisdiction. (Dkt. 1, ¶¶264, 275, 500, p.5.)

IV. THIS COURT SHOULD NOT DISMISS THIS CASE *SUA SPONTE*

In its motion to dismiss the case, Defendant Holland & Knight curiously asks this Court to dismiss the case *sua sponte*. Antonacci is only addressing this, and many other of the Defendants' mindless arguments, because this Court's Fox/Neal Orders admonish Antonacci from ignoring any of the Defendants' arguments. So Antonacci will say that this Court should not dismiss the case for all the reasons set forth herein; but it is unclear to Antonacci how this Court could dismiss the case *sua sponte* after the defendants already moved to dismiss it. Antonacci will leave that lofty riddle to the powerful minds at Jackson Lewis, P.C.

V. PERKINS COIE IS NOT ENTITLED TO ANY "LITIGATION PRIVILEGE" BECAUSE SUCH PRIVILEGE ONLY APPLIES TO COMMON LAW DEFAMATION CLAIMS UNDER DC LAW, AND ILLINOIS'S LITIGATION PRIVILEGE DOES NOT APPLY TO GEHRINGER'S CRIMINAL CONDUCT

Perkins Coie waxes lyrical why an absolute litigation privilege protects their innocence from liability for their criminal conduct, and particularly the criminal conduct of their murine general counsel, Gehringer, who Antonacci will remind this Court fled Perkins Coie and ran home

discern in Rule 41(b) a purpose to change this common-law principle with respect to dismissals in which the merits could not be reached for failure of the plaintiff to satisfy a precondition.").

to his mommy the second Antonacci filed his 2024 complaint in the Eastern District of Virginia. (Dkt. 1 ¶¶3, 418.) No litigation privilege could apply to this case.

"[T]he litigation privilege doctrine has been applied in the District of Columbia only in the common law defamation context." *Osinubepi-Alao v. Plainview Fin. Servs., Ltd.*, 44 F. Supp. 3d 84, 91–92 (D.D.C. 2014) (declining to expand litigation privilege to protect attorneys from liability, under the D.C. Debt Collection Practices Act, for false statements related to a judicial proceeding where the attorneys participated as counsel). Antonacci is not suing these defendants for common law defamation–he is suing them for fraud, racketeering, extortion, attempted murder, public corruption, conspiracy to violate RICO, conspiracy to monopolize the DC legal market to raise attorney billing rates while lowering their bona fide competitiveness, conspiracy to deprive Antonacci of his constitutional right to substantive due process and equal protection, and illegally hacking his protected computer systems. D.C.'s absolute litigation privilege is inapplicable to these causes of action.

In the Eastern District of Virginia, the Perkins Defendants argued that they were shielded from liability by Illinois's absolute litigation privilege, because that is where most of Gehringer's crimes took place. Illinois law also fails to protect the Perkins Defendants from liability here because 1) it does not protect attorneys from liability for their illegal or unlawful acts, as alleged here; and 2) the expansion of the doctrine is a recent development in the First Appellate District, and thus does not even cover the time period when Antonacci was in Chicago and the Perkins Defendants were attacking him there. *See generally*, Amanda J. Hamilton, *It's Okay, I'm a Lawyer! How the Expansion of the Attorney-Litigation Privilege Is Changing the Game*, 107 Ill. B.J. 38 (March 2019) (noting that the 2018 case the Perkins Defendants rely upon, *Scarpelli v.*

McDermott Will & Emery LLP, 2018 IL App (1st) 170874, ¶ 18, 117 N.E.3d 238, is a "significant expansion of the attorney litigation privilege").

The recent expansion of the doctrine in one Illinois Appellate District simply has no bearing on the Perkins Defendants' criminal activities directed at Antonacci in the District of Columbia or the Commonwealth of Virginia. Tellingly, Gehringer never once raised the issue of absolute privilege in his 75-page screed before the Seventh Circuit, which is a matter of public record, but Antonacci will not ask this Court to take judicial notice of that garbage. Furthermore, nothing in the *Scarpelli* decision suggests that it intends to protect attorneys like Gehringer "from the consequences of his participation in an unlawful or illegal conspiracy":

> Illinois courts recognize that claims for conspiracy may be maintained against attorneys where there is evidence that the attorneys participated in a conspiracy with their clients. Accordingly, we see no reason to impose a per se bar that prevents imposing liability upon attorneys who knowingly and substantially assist their clients in causing another party's injury. As we have recognized, **'[o]ne may not use his license to practice law as a shield to protect himself from the consequences of his participation in an unlawful or illegal conspiracy.'** *Celano v. Frederick*, 54 Ill. App. 2d 393, 400 (1964), quoting *Wahlgren v. Bausch Lomb Optical Co.*, 68 F.2d 660, 664 (7th Cir. 1934). The same policy should prevent an attorney from escaping liability for knowingly and substantially assisting a client in the commission of a tort.

Thornwood, Inc. v. Jenner & Block, 344 Ill. App. 3d 15, 28 (1st Dist. 2003) (emphasis added). That is still good law. The legal profession would be well served if the Perkins Defendants gained some self-respect.

VI. STORIJ WAS SERVED

Storij's active registered agent was served in Washington, DC, on February 9, 2026. (Dkt. 18.) This Court may take judicial notice of their Withdrawal of Foreign Registration Statement, filed with the District of Columbia's Department of Consumer and Regulatory Affairs on February 22, 2021, one month after Richard Wheeler began hacking Antonacci's protected computer

systems, as alleged in the Complaint. (Dkt. 1, ¶372; *see also* (*See* Dkt. 68-4.) This Court may also take judicial notice of their public listing with the District of Columbia's Department of Licensing and Consumer Protection, which identifies CT Corporation System as their "Active" commercial registered agent in DC, as many corporations are required, or choose, to retain a registered agent in jurisdictions where they actively conducted business but have since withdrawn their registration, as Storij has done. (*See* Dkt. 68-5.)

Antonacci filed an affidavit providing evidence that Storij's active registered agent was served on February 9, 2026, at the same time that another defendant (Lane) with the same person acting for the same commercial registered agent was served. (Dkt. 18.) Storij has not submitted any evidence rebutting the evidence that Storij has been served; and there is no authority for the proposition that a commercial registered agent may reject service after they have already accepted it in any case. Storij has been served in accordance with this Court's rules and District of Columbia law.

VII. ANTONACCI HAS STATED PLAUSIBLE AND TIMELY RICO CLAIMS

a. All Defendants Are Liable for Every Overt Act of Every Co-Conspirator in Furtherance of the Conspiracy to Which They Each Agreed, And Which They Continue to Demonstrate Is an Open-Ended Pattern of Racketeering Activity, As Shown By the Evolving Nature of the Complaints

It has been well settled for at least three decades that each conspirator in a RICO conspiracy is liable for the overt acts of every other conspirator in a criminal enterprise:

> The partners in the criminal plan must agree to pursue the same criminal objective and may divide up the work, yet each is responsible for the acts of each other. If conspirators have a plan which calls for some conspirators to perpetrate the crime and others to provide support, the supporters are as guilty as the perpetrators…. The RICO conspiracy statute, § 1962(d), broadened conspiracy coverage by omitting the requirement of an overt act; it did not, at the same time, work the radical change of requiring the Government

> to prove each conspirator agreed that he would be the one to commit two predicate acts.

Salinas v. United States, 522 U.S. 52, 63–64 (1997). Furthermore, because few people are inept enough to agree explicitly to criminal conduct, "conspiracy can be inferred from a combination of close relationships or knowing presence and other supporting circumstantial evidence." *United States v. Philip Morris USA Inc.*, 566 F.3d 1095, 1130 (D.C. Cir. 2009) (quoting *United States v. Mellen*, 393 F.3d 175, 191 (D.C.Cir.2004)). Antonacci has alleged the existence of a single conspiracy because the conspirators at the top of this Zionist criminal enterprise, Holland & Knight, Kiernan, Emanuel, Perkins Coie, Gehringer, and Seyfarth Shaw, identified Antonacci as a target in the 2009-2012 time frame, and they have been enlisting and managing others to continue their attempts to destroy Antonacci over the years. (*See, e.g.*, Dkt. 1 ¶¶2-8, 44, 64-5, 70, 79-89, 96-101, 106, 114-16, 140-42, 163-4, 173-76, 252, 261, 275-79, 305-16, 345-47, 366-72, 420-27, 455, 474-75, 500-03, 517-18, 525-27, 540-41.)

The goal of the conspiracy is to destroy Antonacci's legal career to ensure he cannot effectively prosecute criminal Zionist attorneys engaged in widespread fraud, racketeering, extortion, murder, and countless other criminal acts with legal protection and under the color of law, which further grants impunity to Zionist tools such as Emanuel. All acts alleged in the complaint are in furtherance of this conspiracy, and they are managed at the top by Holland & Knight, Kiernan, Emanuel, Perkins Coie, Gehringer, and Seyfarth Shaw.

The Defendants' continued and related acts against Antonacci demonstrate the open-ended nature of this criminal enterprise. When the Seventh Circuit affirmed the Northern District of Illinois's dismissal, albeit on different grounds, of Antonacci's 2015 complaint against this criminal enterprise, it erroneously ruled that Antonacci had alleged a closed-ended pattern of racketeering activity, and that an open-ended pattern was not possible due to "sheer speculation:"

> First, even though his RICO allegations describe specific actions undertaken by specific defendants on certain dates, it takes more than that to allege a plausible conspiracy. The allegations fall far short of meeting the stringent pleading requirements of a civil RICO claim, which requires among other things an allegation of a pattern of racketeering activity that shows either closed-ended or open-ended continuity. *Jennings v. Auto Meter Prods., Inc.*, 495 F.3d 466, 472-73 (7th Cir. 2007). Antonacci's complaint comes nowhere close to meeting this standard. **He seems to be thinking of a closed-ended pattern, because by now the alleged racketeers have succeeded in both sabotaging his state-court lawsuit and his bar application.** But the entire scheme lasted only 21 months, giving Antonacci the benefit of the doubt, and we have repeatedly found that the combination of such a short period with only a single victim of a single scheme is insufficient as a matter of law. *Gamboa v. Velez*, 457 F.3d 703, 709-10 (7th Cir. 2006) (collecting cases). **Nothing but sheer speculation would support the hypothesis of open-ended continuity, either.**

(Dkt. 68-2, pet. app. 7a-8a); *Antonacci v. City of Chicago*, 640 F. App'x 553 at *5 (7th Cir., March 18, 2016). That did not age well. And Antonacci did, in fact, allege in his 2015 complaint that this enterprise presents a clear threat of continued racketeering activity, and argued as much in his Seventh Circuit Briefs and his SCOTUS Petition: "In light of the pattern of racketeering activity more particularly described above, Defendants enterprise presents a clear threat of continued racketeering activity." (Dkt. 51-2 Decl. of B. Cohen p. 8 (¶257 of 2015 complaint, ¶419 of 2024 complaint); *see also* Dkt. 68-2, p. 75, pet. app. 251a.)

And as set forth in the Complaint, the Defendants then felt emboldened by our federal courts to come after Antonacci again with the AECOM Fraud and Storij's illegal computer hacking. After Antonacci got some space from the situation and visited Chicago[3], he started to see

[3] As an aside, but further demonstrating this enterprise's comical lack of credibility, Antonacci took a surprise trip to Chicago earlier this month to confront Tony Antonacci about his false statements to the Virginia State Bar's investigator, Robert Graves. Tony Antonacci admitted that he did the telephone interview with Graves, but denied ever saying to Graves that Louis Antonacci had accused him of having an affair with his ex-wife. Even more amusing, however, is the fact that Tony Antonacci's statement to Graves falsely claims that Louis Antonacci was having personal problems due to his divorce. That does not make any sense because Louis Antonacci had planned to divorce his ex-wife for years, as both Shaun So and Tony Antonacci were well aware, and did it as quickly as possible after he separated from her. It makes more sense in light of the fact that Louis Antonacci learned through others in Chicago that Tony Antonacci's ex-wife, who had been trying to throw him out of her father's house for years, had finished

that this was bigger than his initial case in Chicago. And so he filed his subsequent complaint in the EDVA showing how this started with Holland & Knight, when Antonacci successfully prosecuted his first RICO case against a Zionist criminal lawyer while Emanuel was here as Chief of Staff for President Obama, and how the Zionists orchestrated and administered the AECOM Fraud. Through what Antonacci learned during and after that case, particularly with respect to the Virginia State Bar's unconstitutional persecution, Antonacci now sees clearly that this criminal enterprise is administered by Zionists and Jews who seek to flip the American legal order on its head, just as the Nazis did in the Weimar Republic.[4]

As Antonacci alleged in his 2015 complaint in Chicago, if they could do this to Antonacci, then they can do it to anyone. Despite the self-serving affidavits filed by the defendants, which laughably purport to do this Court's job of reading for it, the three complaints differ in that each successive complaint further demonstrates the open-ended nature of the pattern of racketeering activity perpetrated by this Zionist criminal enterprise. And both Halliburton and Cohen fail to identify or address the 500 pages of exhibits Antonacci attached to his 2024 complaint in the EDVA, which included his 2016 SCOTUS petition and his 2015 complaint in the Northern District of Illinois. (*See* Dkt. 68-2.) What Antonacci continues demonstrating to the federal courts is how these Zionist fanatics continue their racketeering activity through an ever-growing list of

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divorcing Tony Antonacci shortly before he gave his statement to Investigator Graves. In the words of a famous Jew: Blessed are the meek, because you can buy them for cheap.

[4] In the words of the late Hannah Arendt, who renounced Zionism, and Amos Elon, an Israeli journalist:

> The Nazis had succeeded in turning the legal order on its head, making the wrong and the malevolent the foundation of a new righteousness. In the Third Reich evil lost its distinctive characteristic by which until then most people had recognized it. The Nazis redefined it as a civil norm… When Hitler said that a day would come in Germany when it would be considered a disgrace to be a jurist, he was speaking with utter consistency of his dream of a perfect bureaucracy.

HANNAH ARENDT, EICHMANN IN JERUSALEM: A REPORT ON THE BANALITY OF EVIL, Penguin Books, N.Y., N.Y. (1963).

opportunists, and how they are connected to the Zionist leadership alleged in the complaint. Maybe this Court will finally require the Defendants to answer the allegations against them, because the impunity of these Zionist fanatics is about to start a civil war in this country.

The defendants do not rely on any cases with any meaningful comparison to the case at bar. For instance, in *DC2NY, Inc. v. Acad. Bus, LLC*, No. CV 18-2127 (RC), 2019 WL 3779571 (D.D.C. Aug. 12, 2019), the this Court found no pattern of racketeering activity because the plaintiff tried to transform "ordinary commercial fraud… into a federal RICO claim." Antonacci's allegations, to include attempted murder, illegal computer hacking, obstruction of federal court proceedings, extortion, and much more being perpetrated by the officers of our courts charged with protecting against such crimes, is anything but "ordinary commercial fraud."

Similarly, Defendants argue that, because a threat to file a non-frivolous lawsuit cannot be extortion under federal law, Antonacci's claims are barred under RICO. E. *Sav. Bank, FSB v. Papageorge*, 31 F. Supp. 3d 1, 14 (D.D.C. 2014), aff'd, 629 F. App'x 1 (D.C. Cir. 2015). Antonacci never argued that any threat to sue him civilly was extortionist. Antonacci correctly argues that the Illinois State Bar's threat to withhold his Illinois bar admission, unless he dropped his lawsuit against Seyfarth Shaw and Anita Ponder, is extortion under Illinois law and the Hobbs Act, because that is a threat to perform or withhold state action unless Antonacci gave up his legal rights in that litigation. Similarly, the VSB and Richard Johnson attempted to extort Antonacci, under Virginia law and the Hobbs Act, by threatening to institute unconstitutional disciplinary proceedings against Antonacci, in retaliation for his protected speech, if he continued his lawsuit in the EDVA. That is all public extortion under federal, Virginia, and Illinois law, punishable by more than one year in prison, and therefore predicate acts under RICO that the defendants conspired to commit. (Dkt. 1, ¶¶547-9.) Unlike *Papageorge*, Antonacci is not complaining that the defendants sent him letters

threatening to sue him or even moving to sanction him.[5] Antonacci alleges extortion only in relation to conspiracy because all the extortionist threats were committed by state actors. (Dkt. 1, ¶¶547-9.)

b. Neither RICO Count Is Time-Barred Because the Defendants' Predicate Acts and Antonacci's Injuries Are Both Ongoing, and Because the Defendants' Fraudulent Concealment Prevented Antonacci's Apprehension of His Injuries Until 2022

In *Rotella v. Wood*, 528 U.S. 549, 560–61, (2000), the U.S. Supreme Court resolved the three-way split among the federal circuits as to when RICO claims accrue for the purpose of the four-year statute of limitations. There the Court clarified its position in *Klehr v. A.O. Smith Corp.*, 521 U.S. 179 (1997*),* that the injury-discovery rule applies when the plaintiff knew or should have known of his injury, regardless of whether the plaintiff was aware of the pattern of racketeering activity, subject to principles of equitable tolling. This accrual rule is consistent with the caselaw relied upon by Defendants in *Youkelsone v. F.D.I.C.*, 910 F. Supp. 2d 213, 224 (D.D.C. 2012), aff'd, 560 F. App'x 4 (D.C. Cir. 2014), holding that "[w]here the fact of an injury can be readily determined, a claim accrues for purposes of the statute of limitations at the time the injury actually occurs." *Id*. (quoting *Colbert v. Georgetown Univ.*, 641 A.2d 469, 472 (D.C.1994) (en banc).)

[5] Indeed, Barak Cohen, counsel for Perkins Coie, threatened to file a motion for sanctions in the EDVA, even writing a letter with a draft of the motion, telling Antonacci he had been "served" with it. It was adorable. Antonacci invited him to file the motion, but he never did. Cohen has "served" Antonacci with another draft motion for sanctions he threatens to file in this case, which of course he will not do until after Antonacci has filed his oppositions, so that Antonacci will not have timely opportunity for discovery. In any case, Antonacci did not include Barak Cohen's threats to move for sanctions against Antonacci, or Gehringer's similar threats in Cook County and the Seventh Circuit, as a predicate act in this case, because that is not extortion, wire fraud, or mail fraud under Title 18 or relevant state law.

Relatedly, Rokk states this Court should consider sanctions against Antonacci. What Rokk should consider is reading the Federal Rules of Civil Procedure, which require a separate motion for sanctions. Rule 11(c)(2). And in any event, Antonacci has reams of evidentiary support for his claims, so there is no basis for this Court to impose sanctions.

Both *Rotella* and *Youkelsone* recognize that the plaintiff must reasonably be aware of all elements of the claim before it will accrue for the purposes of the statute of limitations: "If the existence of an injury is not readily apparent, however, the claim does not accrue until the plaintiff, exercising due diligence, has 'discovered or reasonably should have discovered all of the essential elements of her possible cause of action, i.e., duty, breach, causation and damages.'" *Id*. (citing *Farris v. Compton*, 652 A.2d 49, 54 (D.C.1994) (quoting *Colbert*, 641 A.2d at 473).) With regard to RICO specifically, "[i]n rejecting pattern discovery as a basic rule, we do not unsettle the understanding that federal statutes of limitations are generally subject to equitable principles of tolling, and where a pattern remains obscure in the face of a plaintiff's diligence in seeking to identify it, equitable tolling may be one answer to the plaintiff's difficulty, complementing Federal Rule of Civil Procedure 11(b)(3). The virtue of relying on equitable tolling lies in the very nature of such tolling as the exception, not the rule." *Rotella*, 526 U.S. at 561.

"[E]ven after a claim has accrued upon discovery of an injury, RICO is 'subject to equitable principles of tolling.' *Rotella*, 528 U.S. at 560. 'Fraudulent concealment ... tolls the running of the statute of limitations' when '(1) defendants engaged in a course of conduct designed to conceal evidence of their alleged wrong-doing and (2) the plaintiffs were not on actual or constructive notice of that evidence, despite (3) their exercise of diligence.'" *Solomon v. Dechert LLP,* No. CV 22-3137 (JEB), 2023 WL 6065025, at *6 (D.D.C. Sept. 18, 2023) (finding RICO and CFAA claims equitably tolled but dismissing on different grounds) (quoting *Firestone v. Firestone*, 76 F.3d 1205, 1209 (D.C. Cir. 1996)).

"The notice required to defeat a tolling argument is 'something closer to actual notice than the merest inquiry notice that would be sufficient to set the statute of limitations running in a situation untainted by fraudulent concealment.' *Riddell v. Riddell Wash. Corp.*, 866 F.2d 1480,

1491 (D.C. Cir. 1989). In addition, the Court 'must probe a plaintiff's knowledge to determine whether he was on notice of all possible defendants, and not just a subgroup, as well as the particular cause of action.' *Hobson v. Wilson*, 737 F.2d 1, 36 (D.C. Cir. 1984), overruled in part on other grounds by *Leatherman v. Tarrant Cnty. Narcotics Intel. & Coordination Unit*, 507 U.S. 163 (1993). '[S]imply because a person knows he has been injured by one person cannot reasonably mean he should be held to know of every other participant.'" *Id*. at *. 6-7 (final quote *Hobson,* 737 F.2d at 36).

Furthermore, as discussed above, "[c]onspiracy is an inchoate [violation]' separate from a violation of § 1962. *Boyle v. United States*, 556 U.S. 938, 950, 129 S.Ct. 237 (2009); *see also Salinas,* 552 U.S. at 64 ("[t]he RICO conspiracy statute, § 1962(d), broadened conspiracy coverage by omitting the requirement of an overt act; it did not, at the same time, work the radical change of requiring the Government to prove each conspirator agreed that he would be the one to commit two predicate acts.") As such, a RICO conspiracy violation arises from the mere agreement to violate one of the substantive RICO provisions; it does not require the completion of a substantive violation or predicate offense.

The difference between the statute of limitations for substantive RICO offenses (§ 1962(a), (b), and (c)) and RICO conspiracy (§ 1962(d)) lies in the distinction between overt and predicate acts. In both cases, the statute begins to run from the date the plaintiff discovers the injury, of which the RICO violation was a proximate cause, unless he was prevented from understanding the source of the injury through fraudulent concealment. And in substantive RICO cases, the relevant injuries must arise from the commission of predicate acts under § 1962. But in RICO conspiracy cases, the relevant injuries may arise from the commission of any overt act in furtherance of the conspiracy.

On a 12(b)(6) motion or even a motion for summary judgment in the District of Columbia, the burden is on the defendant to prove that no set of facts consistent with the allegations could show that the claim is barred by the statute of limitations. *Doe v. Medlantic Healthcare Group, Inc.*, 753 A.2d 939, 945-46 (D.C. 2000). In cases such as this one:

> where the relationship between the fact of injury and the alleged tortious conduct [is] obscure, this court determines when the claim accrues through the discovery rule… [i]n all cases to which the discovery rule applies the inquiry is highly fact-hound and requires an evaluation of all the plaintiff's circumstances. The relevant circumstances include, but are not limited to, the conduct and misrepresentations of the defendant, and the reasonableness of the plaintiff's reliance on the defendant's conduct and misrepresentations.

Id. (internal citations omitted). As such, even "summary judgment is improper when there is a disputed question about plaintiff's diligence in investigating a cause of action." *Id*. (*citing Ezra Co. v. Psychiatric Inst. of Washington, D.C.*, 687 A.2d 587, 593 (D.C.1996).)

Antonacci's injuries in this case are the loss of income to both his law firm, Antonacci PLLC f/k/a Antonacci Law PLLC, which was organized in June of 2014, and from loss of employment opportunities that he earned through professional success, as well as personal injury resulting from the enterprise's attempts to murder Antonacci in 2016 and 2024, and loss of income from his personal injury case as a result of the Parrish Defendant's intentional botching and delay of the case. And unlike the plaintiff in *Greenpeace, Inc. v. Dow Chem. Co.*, 808 F. Supp. 2d 262, 269 (D.D.C. 2011), the injuries alleged here were incurred by Antonacci directly, not some third-party trucking company, so they are in no way "attenuated."

Those injuries have been ongoing for some time, but it was impossible for Antonacci to discover that this enterprise's predicate acts, and the resulting injuries, were ongoing. As Antonacci alleged in the complaint: "After Antonacci's petition for writ of certiorari was denied, he believed that the enterprise alleged in his federal case was done with their campaign to destroy

him. He was wrong, and has since realized the extent and nature of this criminal enterprise." (Dkt. 1 ¶294.).

As this Court held in *Medlantic Healthcare*, this a fact-intensive inquiry that must be done after discovery in this case. 753 A.2d at 945-46. The enterprise's predicate acts, and many overt acts in further of their conspiratorial conduct, are deliberately hidden from Antonacci in a way that he could not possibly ascertain, despite his due diligence. One of this enterprise's best ploys for avoiding accountability is that its acts are so egregious, and represent such a departure from Americans' understanding of how their government and legal institutions are supposed to work, that it is easy to label these facts as the crazy ramblings of a conspiracy theorist. Although that is changing; and Americans' resulting distrust in their government sows a bitter harvest we all have to reap.

The Defendants' timeliness arguments have no merit in general because it is simply not reasonable to assume that 1) your former employer is going to do everything in their power to ensure you never have a successful career just because they feel threatened by you and everyone else they encounter; 2) because you file a lawsuit for textbook defamation against a law firm that mistreated you, and later a RICO claim against the lawyers who would not allow you to be admitted to the bar because of it, those lawyers, and political actors like Rahm Emanuel and the Perkins Defendants, would set an enterprise in motion that for years would limit your mobility so it could (unsuccessfully) set you up for a criminal fraud investigation; 3) that a friend's friend would hire you, in a fiduciary capacity, just to spy on you, for years, even after you helped save his life and dined with his children; 4) that a heavy construction firm would hire you, again in a fiduciary capacity, just to set you up for a criminal fraud investigation and legal malpractice, putting a multi-

billion dollar enterprise at risk[6]; 5) that a state agency would prosecute professional misconduct claims against you, with no basis under the Rules of Professional Conduct, in some sort of Old Testament vendetta for exposing a criminal Zionist lawyer, who are a dime a dozen in this town. And the list goes on.

It is not reasonable to expect someone to assume these things are happening to them, because that is not how this country is supposed to work. And based on the precipitous decline in Americans' trust in our judiciary, it seems to be a relatively new phenomenon here. (Dkt. 68-7.)

As Antonacci alleged in his complaint, he thought his fight with this enterprise was over when SCOTUS denied his petition in 2016. (Dkt. 1 ¶294.) His lack of career mobility was surprising to him, but he kept at it and focused his extra energy on raising a family. When the AECOM Fraud unfolded, Antonacci became more suspicious, but it was not until his ex-wife (and former colleague at Holland & Knight) faked a kidney stone, trying to prevent him from sending the KPMG audit response letter (dkt. 1 ¶¶398-408), that Antonacci realized this was not over. But even then, it took some time to put the pieces together. (*See* Dkt. 68-2 (Exs. H-J).) As alleged in the Complaint, Antonacci traveled to Chicago in June of 2022 to do some due diligence, which further confirmed his suspicions. (Dkt. 1 ¶410.) Antonacci's subsequent inability to find work for his firm, or employment, even before he filed his complaint in the EDVA, are the injuries that Antonacci was not aware of until 2024. Antonacci had assumed he would be able to find work or a job, which he has aggressively pursued after the AECOM Fraud. As alleged in the complaint, Antonacci has not received an employment offer, despite literally hundreds of job application, in

[6] The Lane Defendants argue that Antonacci's RICO claim against them accrued in July 2021 because that is when Firmender ordered work stopped on the case. That was not the injury – Antonacci did not want to work with the Lane Defendants any longer because they were clearly engaged in unethical and fraudulent misconduct that Antonacci did not wish to be associated with, as evidenced by Firmender's subsequent departure from Lane. (*See* Dkt. 68-2.) It was not until he did not have any work a year later that he realized there had been long-term economic injury as a result of his work with Lane.

15 years. (Dkt. 1 ¶339.) He has had no work or employment opportunities, but he always thought that could change because he has always been a very productive employee and, save the orchestrated AECOM Fraud that he could not win no matter what he did, a very successful advocate for his clients.

This enterprise has committed innumerable predicate acts against Antonacci over the years, and they are ongoing, but it cannot be said that Antonacci discovered the source of his injuries until the summer of 2022. And even now the extent of the enterprise's predicate and overt acts cannot be ascertained without discovery because they are surreptitious by design. If the enterprise's targets were aware of the enterprise's activities, they simply would not work.

Antonacci has been more than diligent in investigating his claims and pursuing his rights. In 2015, he saw how the Perkins Defendants and Emanuel bought his lawyer and others to sabotage his initial defamation case against Ponder and Seyfarth and block his admission to the Illinois Bar, and because he had prosecuted a civil RICO in the EDVA previously, he saw it plainly as a pattern of racketeering activity and filed a RICO suit right away. The contradictory and baseless decisions of the Northern District of Illinois and the Seventh Circuit demonstrate that point.

And according to the Seventh Circuit's own opinion, Antonacci sufficiently pleaded the predicate acts, he just did not properly plead an open-ended pattern of racketeering activity (but he did, as this Court can see in the Defendants' affidavits, discussed above), which it deemed impossible because that would require "sheer speculation." So after the AECOM Fraud, he filed another complaint showing how this started in 2009 and continues to this day.

The opinion dismissing that case is four pages of inaccurate vitriol, and the district court even refused to enter default against Fusion GPS there, despite there being no dispute they were in default. (Dkt. 1 ¶¶500-01.) Antonacci appealed the dismissal, was nearly killed a week later

(dkt. 1 ¶¶500-03), and the Virginia State Bar instituted a disciplinary action against him in a show trial that put Cook County's disregard for the rule of law to shame. (Dkt. 1 ¶¶420-22.) Antonacci got the license plate number of the person who tried to kill him, but so far no Virginia lawyer or court will allow him any justice. (Dkt. 1 ¶¶510-14.)

And so here we are again. What more could Antonacci do to diligently pursue his rights against this Zionist enterprise? If the answer is that this Zionist enterprise simply owns these Courts and they get to decide who gets justice, regardless of the U.S. Constitution, the U.S. Code, the Federal Rules of Civil Procedure, and 900 years of common law, then you can expect violence from the overwhelming majority of Americans who feel they no longer have realistic options to thrive in their country. Because you will have given the people who played by the rules no other choice.

The injuries arising from the AECOM Fraud and later are within the four-year statute of limitations because Antonacci was not aware of his injuries until summer of 2022 at the earliest. *Rotella*, 528 U.S. at 560-61. The statute of limitations for earlier injuries should be tolled because of the surreptitious and self-destructive nature of this criminal Zionist enterprise, and because Antonacci has diligently investigated his claims and pursued his rights over the years, all while the defendants continually misrepresented their true intentions and intentionally created and exploited fiduciary relationships with Antonacci in order to deceive him. *Id., Solomon,* 2023 WL 6065025, at *6, *Riddell*, 866 F.2d 1491, *Hobson,* 737 F.2d at 36. Indeed, these defendants should be precluded from asserting the statute of limitations defense because their motions to dismiss are premised on their position that they have never done any of the things that Antonacci alleges. And they will not even answer the requests for admission Antonacci served here and in the EDVA. At

a minimum it is a question fact that cannot be addressed until after discovery, consistent with the District of Columbia's long-held discovery rule. *Medlantic Healthcare*, 753 A.2d at 945-46.

c. Every Defendant Conspicuously Ignores the Express Definition of the "Enterprise" Set Forth in the Complaint, Conceding That It Is Adequately Alleged

Like teenage boys on prom night, the defendants clumsily fumble around trying find the elusive definition of their Zionist criminal enterprise. This is again an "argument" that Antonacci would have ignored save this Court's Fox/Neal Orders, but since the defendants seem incapable of unsnapping the treasure chest, Antonacci will again quote the definition directly:

> 517. Specifically, the enterprise is an association-in-fact among individuals and business entities designed to divert taxpayer money to members of the enterprise; destroy the professional reputation of anyone who seeks to expose the nature and extent of the enterprise through fraud, widespread defamation, and murder; protect the members of the enterprise from civil liability by unlawfully influencing the outcome of civil cases, thereby keeping more money in the enterprise; defrauding litigants from monies to which they are legally entitled by unlawfully delaying and sabotaging meritorious civil cases; bribing and otherwise incentivizing people associated with those deemed enemies of this enterprise to spread lies about those "enemies;" punishing attorneys who sue members of the enterprise by preventing them from becoming admitted to practice law; punishing attorneys who sue members of the enterprise by putting them on the Blacklist of disfavored attorneys; illegally infiltrating protected computers to spy on the "enemies" of the enterprise, in some cases through fraudulently obtained search warrants; and protecting the enterprise by unlawfully preventing them from obtaining evidence of the enterprise's fraudulent misconduct.
>
> 518. The enterprise is administered and funded primarily by Zionists and Jews, but they will utilize anyone they can bribe or extort to accomplish their goals.

(*See. e.g.*, Dkt. 1 ¶¶517-18, 540-41.) In addition, as set forth throughout the complaint, this particular faction of this Zionist enterprise has continuous leadership in Emanuel, Kiernan, Gehringer, Perkins Coie, Holland & Knight, and Seyfarth. (Dkt. 1, 81, 82, 88, 93, 98, 106, 111,

126-27, 140, 227-29, 306, 362.) That is how this enterprise has been able to continue its racketeering activity against Antonacci, as alleged in the complaint.

d. The Predicate Acts Are Set Forth Specifically in Each Count, While Some Are Referenced from Incorporated Factual Allegations for Sake of Brevity, and Antonacci Has Alleged Numerous Schemes to Defraud, Extort and Murder Him

The defendants decidedly ignore much of the complaint when discussing the alleged predicate acts and the schemes to defraud, extort, and murder Antonacci, as well as their schemes to obstruct federal court proceedings. In furtherance of these schemes, the defendants utilized interstate mails and wires and they engaged in interstate travel. The defendants committed these predicate acts innumerable times with ten-year periods, all in violation of 18 U.S.C. §1962(a), (b), and (c). The defendants also conspired to commit these predicate acts, in violation of 18 U.S.C. §1962(d).

Antonacci discusses the facts common to all counts in mostly chronological order, further separating the allegations by category relative to the criminal enterprise's fraudulent, extortionist, and murderous schemes:

1) Holland & Knight's DC office where Antonacci filed his first RICO complaint against a Zionist attorney who was later convicted of tax evasion and disbarred and Antonacci's termination from Holland & Knight after successfully prosecuting that RICO case against a Zionist attorney, unable to find a job for 16 months despite winning every case he touched (dkt. 1, ¶¶22-117);
2) Sabotage of his state court case against Anita Ponder and Seyfarth Shaw and extortion by the Illinois State Bar (dkt. 1, ¶¶118-252);
3) Antonacci's introduction to Shaun So and Richard Wheeler, setting him for human intelligence gathering and illegal computer hacking, immediately after he

filed his RICO complaint against Perkins Coie and the City of Chicago in the Norther District of Illinois (dkt. 1, ¶¶252-263);

4) Antonacci's federal case in Illinois and how the leadership of this Zionist criminal enterprise obstructed justice and Perkins Coie engaged Fusion GPS and Rokk to collect intelligence and provide a disinformation campaign concerning Antonacci (dkt. 1, ¶¶264-281);

5) Immediately before Antonacci's SCOTUS petition to the Seventh Circuit is denied, and the evening before he has an international flight, Antonacci is assaulted by middle-aged, African-American lobbyist for the Department of Veterans Affairs contractors, one of Defendant Storij's biggest clients, who threatens to kill Antonacci and calls him a "privileged white piece of shit" (dkt. 1, ¶¶281-93);

6) the enterprise's enlistment of Antonacci's family and friends in Chicago, providing funding to his degenerate brother in exchange for his brother's defamation of Antonacci, and setting up The Gibsons Restaurant Group with a partnership with the Think Food Group, Holland & Knight's client, in exchange for Stephen Lombardo's arrangement with his Georgetown classmate, Firmender, to implement the AECOM Fraud (dkt. 1, ¶¶294-336);

7) Lane Construction, the AECOM Fraud, Storij's violations of the Computer Fraud and Abuse Act, and Antonacci's 2022 due diligence trip to Chicago (dkt. 1, ¶¶337-420);

8) the Virginia State Bar's unconstitutional persecution of Antonacci and its ties to organized crime (dkt. 1, ¶¶420-73);

9) Descrybe.ai conspires to publish materially false caselaw concerning Antonacci in preparation for Rahm Emanuel's presidential run (dkt. 1, ¶¶474-99);

10) the defendants' attempted murder of Antonacci, while he was cycling, exactly one week after he filed his notice of appeal of the EDVA dismissals, and Parrish joins the conspiracy, through a referral from Virginia State Bar Board Member, Bradley Marshall, and attempts to protect the driver and prevent Antonacci from recouping his damages. (Dkt. 1, ¶¶500-14.)

Antonacci cannot make it much easier to comprehend.

The Defendants do not really dispute the predicate acts of extortion, obstruction and attempted murder, they mostly just claim it was not each individual defendant who performed the act, which is irrelevant to their collective liability. And Antonacci does not engage in improper "group pleading" because he describes the individual acts of the defendants, but alleges their collective liability with respect to the enterprise's predicate acts and his conspiracy claims. Notably, Defendant Johnson did not file a 12(b)(6) motion, but rather is hiding in his basement while the Virginia State Bar disputes personal jurisdiction on his behalf, because he is too scared to go to his office and accept service of process. (Dkt. 22, 37.) Johnson's actions are plainly indefensible.

The Defendants dispute the specificity with which Antonacci alleged the predicate acts of mail and wire fraud, and his allegations of interstate travel. The defendants cite no authority in support of their proposition that interstate travel in support of their schemes require further detail. The interstate travel Antonacci alleges is set forth specifically in his complaint, and that the travel occurred is a natural consequence of the specific acts alleged.

For example, Antonacci alleges that Shaun So lives in Brooklyn, NY, and that Richard Wheeler lives in Glendale, California, and that Storij maintained offices in Brooklyn, NY, and Washington, DC. Antonacci alleges that he personally met Shaun So and Richard Wheeler in Washington, DC, and that Shaun So frequently visited Washington, DC during his six years working with Antonacci. Antonacci further alleges that Leslie Kiernan is married to Paul Kiernan, who is a partner at Holland & Knight's DC office so it may be inferred they live in the DC area. Antonacci alleges that Leslie Kiernan traveled to Chicago, Illinois to obstruct Antonacci's case before the Seventh Circuit when she interviewed Diane Wood for an available SCOTUS position. Antonacci specifically alleged that Stephen Lombardo traveled from Chicago, Illinois to Chevy Chase, Maryland to meet with Jose Andres in furtherance of this scheme.[7] Antonacci has alleged the places these people traveled, how it facilitated their fraudulent, obstructionist, and extortionist schemes, and the general time frames. He need not provide copies of their plane tickets.

As for mail and wire fraud, the elements of these predicate acts is very simple, as established in the caselaw relied upon by defendants:

> The elements of federal mail and wire fraud are "(1) a scheme to defraud, and (2) use of the mails or wires for the purpose of executing the scheme." *United States v. Alston*, 609 F.2d 531, 536 (D.C. Cir. 1979); *see also Johnson v. Computer Tech. Servs., Inc.*, 670 F. Supp. 1036, 1039 (D.D.C. 1987) (applying Alston to a civil RICO claim).
>
> **The first prong reaches "any scheme to deprive another of money or property by means of false or fraudulent pretenses, representations, or promises."** *Carpenter v. United States*, 484 U.S. 19, 27, 108 S.Ct. 316, 98 L.Ed.2d 275 (1987). "The scheme to defraud must threaten some cognizable harm to its target." *United States v. Lemire*, 720 F.2d 1327, 1336 (D.C. Cir. 1983) (citing cases). Cash and in-kind bribery are tangible harms. N'west'n Bell Tel. Co., 492 U.S. at 234, 109 S.Ct. 2893. So are threats. *Fed. Info. Sys., Corp. v. Boyd*, 753 F. Supp. 971, 975 (D.D.C. 1990). **Intangible harm can take the form of favors exchanged for false promises, or invasion**

[7] Jose Andres resigned as CEO of Think Food Group in May of 2024, shortly after Antonacci filed the EDVA complaint.

> **of privacy through confidential information.** *Lemire*, 720 F.2d at 1336.
>
> **Of course, there must also be a use of the mail or wires, where mail involves any delivery by the Postal Service or any other "private or commercial interstate carrier," and wire means transmittal "by means of wire, radio, or television communication in interstate or foreign commerce."** 18 U.S.C. §§ 1341, 1343. Mailing and e-sending fraudulent tax returns involves use of the mail or wires. Anza v. Ideal Steel Supply Corp., 547 U.S. 451, 454 (2006). **Even mailings between conspirators "in furtherance of the overarching scheme to defraud" may qualify.** *Id*.

Ambellu v. Re'ese Adbarat Debre Selam Kidist Mariam, 406 F. Supp. 3d 72, 77–78 (D.D.C. 2019), aff'd sub nom. *Ambellu v. Re'ese Adbarat Debre Selam Kidist Mariam Ethiopian Orthodox Tewhado Religion Church*, No. 19-7124, 2020 WL 873574 (D.C. Cir. Feb. 14, 2020) (emphasis added). The Defendants incorrectly rely on *Ambellu* for the proposition that Antonacci's mail and wire fraud allegations are not adequately pled, but in *Ambellu* this Court found that plaintiffs mail and wire fraud allegations were, in fact, pleaded with sufficient particularity. *Ambellu*, 406 F. Supp. 3d at 79 ("[plaintiff's] failure is not a lack of particularity, it is that the facts they particularly allege do not constitute a RICO claim.").

In *Ambellu*, the schemes involved assault rather than attempted murder, threats to take corporate actions that were both untimely and did not involve the use of mails or wires, soliciting new members of the church in ways that were neither fraudulent or nefarious, and failing to hold a vote on corporate action. *Id*. at 79-80. The Court held that those actions not only independently failed to establish RICO allegations, but also did so collectively. *Id*. at 80. *Ambellu* is similar to *DC2NY*, 2019 WL 377957, discussed above, in that the schemes complained of were either "ordinary commercial fraud" or not fraud at all. Similarly, while Antonacci zealously advocates for his clients, the tortious and criminal conduct he alleges in his complaint is anything but "the provision of normal legal services." *RSM Prod. Corp. v. Freshfields Bruckhaus Deringer U.S. LLP*, 682 F.3d 1043, 1051 (D.C. Cir. 2012).

As discussed above with respect to the statute of limitations, maybe the clearest indication, besides the plain language of the complaint, that the Defendants' actions are anything but ordinary commercial fraud or ordinary legal services, is the vehemence with which they proclaim that the truth of Antonacci's allegations is beyond belief. Indeed, rather than simply deny the truth of key allegations in response to Antonacci's requests for admission, these defendants are fighting tooth and nail to resist having to answer them. Antonacci spelled out at least ten separate but interrelated schemes above, none of which are ordinary, as illustrated by the defendants specious and hysterical denials.

With respect to the allegations of mail and wire fraud, Antonacci has pleaded those innumerable predicate acts with sufficient particularity, giving dates and context where available. The volume of these predicate acts is also compelling: Antonacci has alleged at least one hundred instances of wire and mail fraud in this case. (Dkt. 1, ¶¶136, 140-42, 164, 200-02, 207, 213, 220-39, 259-61, 316, 337, 351, 377, 437, 466, 471-477, 493-94, 510-14, 523-24.) And Antonacci could plead with further particularity as to the communications to which he is a party, which are many, but to do so would lose the forest for the trees, as it would be mind-numbingly boring to follow. Antonacci has pleaded mail and wire fraud with sufficiently particularity to allow the Court to see when, why, and between and among whom these interstate wires and mails were used, in furtherance of the racketeering activity described in the Complaint, to manage the production and admission of evidence in this case.

In *Philip Morris*, 566 F.3d at 1118, this Circuit found 108 instances of mail and wire fraud, regardless of whether the transmissions themselves were fraudulent, were sufficient, standing alone, to constitute a pattern of racketeering of racketeering activity under RICO: "The 108 enumerated acts give us ample basis to review the district court's finding. Although the district

court may have concluded other racketeering acts were proven as well, we need look no further…. A mailing or wire transmission need not itself be fraudulent…". Antonacci has alleged multiple schemes to defraud and extort him out of money and property, and kill him, all of which utilized interstate mails and wires in furtherance of that scheme, which Antonacci has pled with sufficient particularity.

Finally, Defendants claim it is impossible to state a RICO claim, in this Circuit, where there is "only a single scheme, a single injury, and few victims." *Adler v. Loyd*, 496 F. Supp. 3d 269, 278 (D.D.C. 2020) (single scheme involving twelve predicate acts over a four-month period). But Antonacci is not alleging a single scheme and a single injury and predicate acts occurring over a short period of time. Antonacci is alleging a Zionist conspiracy–arising out of some twisted vendetta against Antonacci because he does his job well–that spans 16 years and at least three states and the District of Columbia, involves at least ten fraudulent and extortionist schemes, as well as two attempts at murder, obstruction of justice in at least two federal cases, and the evisceration of any semblance of integrity from the American legal profession. RICO was signed into law to prevent misguided lawyers and politicians, like these defendants, from metastasizing their cancerous criminality into the marrow of this nation. Defendants' motions to dismiss must be denied.

VIII. ANTONACCI HAS STATED A CLAIM UNDER DC'S ANTITRUST ACT BECAUSE THIS THIS CRIMINAL ENTERPRISE HAS MONOPOLIZED THE DC LEGAL MARKET, WHICH CAN BE EASILY PROVED BY DC'S METEORIC BILLING RATE INCREASES, AND ALL DEFENDANTS ARE LIABLE FOR EVERY ACT OF THEIR CO-CONSPIRATORS SO THE CLAIM IS NOT BARRED BY THE STATUTE OF LIMITATIONS

"Most antitrust claims are analyzed under a 'rule of reason,' according to which the finder of fact must decide whether the questioned practice imposes an unreasonable restraint on competition…. *State Oil Co. v. Khan*, 522 U.S. 3, 10, 118 S.Ct. 275, 139 L.Ed.2d 199 (1997). The

general issue is 'whether the restraint's anticompetitive effects substantially outweigh the procompetitive effects for which the restraint is reasonably necessary.'" *Atlantic Coast Airlines Holdings, Inc. v. Mesa Air Group, Inc.*, 295 F.Supp.2d 75, 94-95 (D.D.C. 2026) (quoting ABA Section of Antitrust Law, Antitrust Law Developments 53 (4th ed.1997).) Here, as alleged in the complaint, this Zionist criminal enterprise seeks to impose counterproductive restraints on trade that make the legal profession less competitive and more expensive. The national impact of this Zionist criminal enterprise has been to utterly destroy America's confidence in its legal institutions. (Dkt. 68-7.)

As stated above, because DC conspiracy law allows a conspiracy to be established through circumstantial evidence, the defendants' agreement, administered by the principles at the top of their criminal enterprise, to destroy Antonacci's legal career so that Zionist criminals may monopolize the legal markets in DC, Northern Virginia, and Chicago is plainly alleged in the complaint and Antonacci will refer the Court back to Section I, II, and VII *supra*. Antonacci asks this Court to take judicial notice of two publicly available documents:

1) The 2026 Law Firm Rates Report generated by the Thompson Reuters Institute, demonstrating the astronomical rise in law firm billing rates across the country, with law firm revenues rising from two to three times the rate of inflation over the past 20 years, despite the hours worked and demand remaining flat. (Dkt. 68-6.)

2) December 17, 2024 Gallup Report: "Americans Pass Judgment on the Courts: Sharp decline in confidence in judiciary is among the largest Gallup has ever measured." From 2020 to 2024, reported confidence in the U.S. judicial system dropped 24 percentage points, from 59% to 35%. "The decline in confidence in the U.S. judicial system not only means the U.S. ranks below other rich nations, it is also among the steepest declines Gallup has measured globally on this metric." (Dkt. 68-7.)

The results are in: The Zionists' impact on the legal system has profound anticompetitive impacts and no procompetitive impacts.

Americans should be proud of their justice system. These Zionists are destroying it. Their most recent attacks on Antonacci coincide with the steepest drop in perceived judicial fairness in Gallup's *global* reporting history. And shortly after Antonacci was sidelined from law firm legal practice, the industry saw a sustained rise in revenue that is many multiples of inflation, despite "working" the same number of hours. These defendants have created a racket administered by unscrupulous Zionists with an unacceptable percentage of compliant judges. This is exactly what the DC Antitrust Act was enacted to prevent and this Court should hold these defendants accountable.

Because all these defendants are accountable for the acts of their co-conspirators, none of the defendants is outside the four-year statute of limitations.[8]

Defendants do not cite any controlling precedent supporting their position. Their reliance on *Brunswick Corp. v. Pueblo Bowl-O-Mat, Inc.*, 429 U.S. 477 (1977) is misplaced because that case, arising out of the merger of bowling equipment manufacturers in New Jersey, implicated the federal Clayton Act, rather than D.C. Antitrust law. And unlike the plaintiff's in *Brunswick Corp.*, Antonacci's damages flow directly from the defendant's anticompetitive behavior as they seek to eliminate ethical attorneys who expose Zionist criminals masquerading as lawyers. And in *Atlantic Coast Airlines.*, 295 F.Supp.2d at 96 (D.D.C. 2020), cited above, this Court granted the plaintiff's preliminary injunction preventing the anticompetitive merger because "the public interest is served by ensuring no unreasonable restraints on competition." In this case, the public has spoken, and the result of the Zionists's anticompetitive racketeering is making the legal system inaccessible and perceptibly unfair, undermining the rule of law and putting our civil society at grave risk.

[8] The Lane Defendants incorrectly state that the applicable statute of limitations is three years. They are wrong.

IX. ANTONACCI HAS STATED A CLAIM UNDER 28 USC §1985(3) BECAUSE JOHNSON'S UNCONSTITUTIONAL PERSECUTION OF ANTONACCI IS A NATURAL CONSEQUENCE OF THE CONSPIRACY TO DESTROY ANTONACCI'S CAREER, WHICH ALL DEFENDANTS JOINED WILLFULLY, AND ANTONACCI WAS DENIED EQUAL PROTECTION FOR THOSE SIMILARLY SITUATED, SO HE IS A PROTECTED CLASS OF ONE

"The Constitution's guarantee of equal protection under the law is violated when government action treats someone 'differently from others similarly situated and ... there is no rational basis for the difference in treatment.' This type of so-called "class of one" claim may be brought under the Fourteenth Amendment when the alleged violation is committed by a state government actor…." *Perkins Coie,* 783 F. Supp. 3d at 166 (quoting *Vill. of Willowbrook v. Olech*, 528 U.S. 562, 564 (2000).) The plaintiff need not literally be the only one in the class because "the key is that the differential treatment is not based on 'membership in a protected class' but on arbitrary mistreatment or animus." *Id*. at 167 (quoting Perkins Coie's memorandum of law.)

An attorney's lawsuit against his or her former client, alleging the client's tortious misconduct directed at that attorney, cannot be deemed misconduct by the attorney. Va. Rule Prof. Cond. Rule 1.6(b)(2). If a bar complaint against an attorney "does not present an issue under the Disciplinary Rules, Bar Counsel must not open an Investigation, and **the Complaint must be dismissed**." Va. R. Sup. Ct. 13-10. Courts must use their own judgment to interpret laws, not defer to agencies' interpretation. *Loper Bright Enterprises v. Raimondo*, 144 S. Ct. 2244, 2263 (2024) (overruling *Chevron U.S.A. Inc. v. Natural Resources Defense Council, Inc.*, 467 U.S. 837 (1984)).

The constitutions of both the United States and Virginia guarantee due process of law for each of its citizens, which is intertwined with the right to free expression. U.S. Const. Amends. I, V and XIV; Va. Const. Art. I, Sections 11 and 12. Although the requirements of procedural due process are fluid and fact dependent, the point of procedural due process is to require procedural fairness and to prohibit the state from conducting unfair or arbitrary proceedings. *Johnson v.*

Morales, 946 F.3d 911 (6th Cir. 2020); U.S. Const. Amend. XIV; *see also* 16C C.J.S. Constitutional Law § 1884. "'[D]ue process is flexible and calls for such procedural protections as the particular situation demands.'" *Mathews v. Eldridge*, 424 U.S. 319, 334 (1976) (quoting *Morrissey v. Brewer*, 408 U.S. 471, 481 (1972)).

"On several levels, Article I, Section 11 parallels the procedural due-process protections in the Fifth and Fourteenth Amendments to the United States Constitution…. In this respect, we hold that the protections of Article I, Section 11 are at least as strong as the existing understanding of procedural due-process rights secured by the United States Constitution." *Vlaming v. W. Point Sch. Bd.*, 302 Va. 504, 573–76, 895 S.E.2d 705, 743 (2023). "Under settled procedural due-process principles, a government requirement "is unconstitutionally vague if persons of 'common intelligence must necessarily guess at [the] meaning [of the language] and differ as to its application.'" *Id*. at 743-44. (quoting *Tanner v. City of Va. Beach*, 277 Va. 432, 439, 674 S.E.2d 848 (2009).

If a provision of law does not have "ascertainable standards," then it does not give its citizens the "fair notice" required by the due process clause. *Id*. at 744. "This principle is particularly important when "vague language" implicates free-speech concerns because of the risk that individuals will self-censor "based on a fear that they may be violating an unclear law.'" *Id*. (quoting *Tanner*, 277 Va. at 439); *see also FCC v. Fox Television Stations, Inc.*, 567 U.S. 239, 253-54 (2012) (recognizing that the "requirement of clarity in regulation is essential to the protections provided by the Due Process Clause" and that "[w]hen speech is involved, rigorous adherence to [due-process] requirements is necessary to ensure that ambiguity does not chill protected speech").

"The constitutional prohibition against vagueness also protects citizens from the arbitrary and discriminatory enforcement of laws. A vague law invites such disparate treatment by impermissibly delegating policy considerations 'to policemen, judges, and juries for resolution on an ad hoc and subjective basis, with the attendant dangers of arbitrary and discriminatory application.'" *Tanner*, 277 Va. at 439 (quoting *Grayned v. City of Rockford*, 408 U.S. 104, 108-9 (1972).

As alleged in the complaint, Johnson and the Virginia State Bar brought a complaint against Antonacci for conduct that no reasonable attorney or layperson could deem professional misconduct under the Virginia rules. (Dkt. 1, ¶¶420-63, 547, 549, 651-66.) As alleged in the complaint, Antonacci was subject to this differential treatment based on arbitrary resentment or animus because he had exposed a criminal Zionist attorney early in his career, and further exercised his protected speech in identifying this criminal Zionist attorney in his 2024 complaint in the EDVA, and thus Antonacci has been denied equal protection under the law. *Perkins Coie LLP v. U.S. Dep't of Just.*, 783 F. Supp. at 166-67; *Olech*, 528 U.S. at 564; *Morales*, 946 F.3d 911; *Mathews*, 424 U.S. at 334; *Vlaming*, 302 Va. at 573–76; *Tanner*, 277 Va. at 439; *Fox,* 567 U.S. at 253-54; *Grayned*, 408 U.S. at 108-9. As a result of this denial of due process and equal protection of law, Antonacci was subject to forfeiture by this Zionist criminal enterprise. (Dkt. 1, ¶¶420-63, 547, 549, 651-66.)

As alleged in he complaint, all the defendants knowingly and willfully joined the conspiracy to destroy Antonacci's legal career, of which the Virginia State Bar and Johnson's unconstitutional persecution was expressly or impliedly agreed as a foreseeable consequence of such an agreement:

> 462. This again demonstrates that this Zionist criminal enterprise has no regard for the rule of law, but rather seeks to weaponize courts of law in

> order to attack and discredit anyone who criticizes their criminal conduct and irredeemable nature.
>
> 463. The Virginia State Bar's persecution of Antonacci violated the due process and free speech protections of the U.S. Constitution because no reasonably intelligent lawyer could deem disclosing client information in a lawsuit against that client to be a violation of the Virginia Rules of Professional Conduct, and because it was clearly retaliation for Antonacci's protected speech against the Zionist criminal enterprise associated with the Democratic National Committee and Rahm Israel Emanuel.
>
> 590. Defendants combined, agreed, mutually undertook, and concerted together, and with others, to effect preconceived plan and unity of design and purpose.
>
> 591. The purpose of this plan was unlawfully to destroy Antonacci's legal career so that he could not expose the criminal nature of this enterprise
>
> 663. All of these actions by the Virginia State Bar, Johnson, and Shaun So, were part of the ongoing conspiracy, detailed above and incorporated herein, to derail Antonacci's legal career ever since he exercised his free speech, on behalf of his client in the Eastern District of Virginia in 2009, where he alleged that the fraudulent scheme of a Zionist attorney, Gerald I. Katz, violated RICO. All acts leading up to the Virginia State Bar's blatant denial of Antonacci's constitutional rights are all part of the same conspiracy and all Defendants are therefore liable for the conspiratorial acts alleged herein.
>
> 664. All Defendants, including the Virginia State Bar, Johnson, Parrish, 9208 Lee and Parrish Law were fully aware of the conspiracy they agreed to join.
>
> 665. As a proximate result of these denials of due process of law, Antonacci has suffered professional injuries, to include suspension of his bar license, and the disgrace of being associated with a bar association, for over 20 years, that would deprive its member of right and privileges guaranteed under the U.S. Constitution, at the behest and for the benefit of, a Zionist criminal enterprise.

(Dkt. 1, as noted.) These defendants are liable for this unconstitutional persecution because it is a natural and foreseeable consequence of the criminal conspiracy they agreed to join. Similarly, the statute of limitations does not bar this claim against any member of this conspiracy because the forfeiture in question occurred less than one year ago.

X. ANTONACCI HAS STATED A CLAIM UNDER 10 U.S.C. §1030 BECAUSE HE NEVER GAVE STORIJ ANY ACCESS TO HIS PROTECTED COMPUTERS, AND THE CLAIM IS NOT BARRED BY THE STATUTE OF LIMITATIONS BECAUSE THE INFILTRATION MAY BE ONGOING AND THE LIMITATIONS PERIOD SHOULD BE EQUITABLY TOLLED IN ANY CASE

Richard Wheeler hacked Antonacci's protected computer systems so the enterprise could monitor Antonacci to determine his plans, strategy, and outlook on Lane's case throughout the AECOM Fraud. (Compl. ¶¶366-72, 523.h-j., 550.g., 612-13, 668-72.) Wheeler was not interviewed by VSB Investigator Graves, or called as a witness by Johnson, because he lives outside Antonacci's subpoena power and he is the only witness with personal knowledge of the illegal hacking he performed. (Compl. ¶¶440-44.)

This information gained from this illegal infiltration was disseminated to Firmender and David Mancini, counsel for AECOM, possibly through intermediaries in the enterprise. (Compl. ¶¶ 366-72, 523.h-j., 550.g., 612-13, 668-72.) Essentially the enterprise wanted to determine whether Antonacci knew he was being set up, and once he brought the damaging evidence to Firmender's attention, how he would proceed so that, having failed in getting an indictment or basis for legal malpractice, the enterprise could nonetheless defame Antonacci PLLC in order to prevent him from getting additional work. (Compl. ¶¶523.h-j.) Those are the injuries.

As for access, Storij has again made its circular argument that Antonacci's allegations are conclusory because they are conclusory, which does not merit discussion. Storij further argues that Antonacci's CFAA must fail because Antonacci does not allege the details of how Storij hacked into his computers. Antonacci is under no obligation to do so. Antonacci has alleged that Richard Wheeler has such expertise and the circumstances surrounding their hacks, which Storij will not even deny. Antonacci is not a hacker.

The caselaw on this issue is not helpful for Storij. The Supreme Court in *Van Buren* held that the threshold inquiry for CFAA cases is simply whether the defendant had lawful access to the data, irrespective of their motives. *Van Buren v. United States*, 593 U.S. 374, 381, 141 S. Ct. 1648, 1653–54 (2021) (holding that the "[l]iability under both clauses stems from a gates-up-or-down inquiry—one either can or cannot access a computer system, and one either can or cannot access certain areas within that system.").

Storij was never granted any access to Antonacci's computers, so its access was plainly without any authorization: the "gate" was always "down." There are no allegations even suggesting that Antonacci granted Storij any such access. And Storij's intent to defraud is well established throughout the complaint. Storij is therefore liable to Antonacci for damages resulting from its unauthorized access, pursuant to 18 U.S.C. §1030.

Finally, this claim is not time-barred because Antonacci has alleged that the infiltration is ongoing. As this Court has long held, discussed above, "because statute of limitations issues often depend on contested questions of fact, dismissal is appropriate only if the complaint on its face is conclusively time-barred." *Firestone*, 76 F.3d at 1209; *see also Medlantic Healthcare*, 753 A.2d at 945-46. In addition, the applicable limitations period should tolled as a result of Storij's fraudulent concealment of its nefarious activities. *Solomon,* 2023 WL 6065025, at *6. Finally, as the Supreme Court held in *Rotella*, 528 U.S. at 560-61, equitable tolling applies to all federal statutes where appropriate. To the extent this Court believes the limitations period has lapsed from the time Antonacci discovered the injury, Antonacci requests this Court equitably toll that period.

STATEMENT REQUESTING ORAL ARGUMENT

Antonacci requests oral argument.

CONCLUSION

WHEREFORE, for the reasons stated herein, and in his Opposition to Defendants' 12(b)(2) Motions to Dismiss, Plaintiff Louis B. Antonacci hereby requests this Court **DENY** the Motions to Dismiss the Complaint filed by Defendants Lane Construction Corp. and Seth T. Firmender's (dkt. 28), Perkins Coie LLP, Matthew J. Gehringer, Anita J. Ponder, and Seyfarth Shaw LLP (dkt. 51), Storij, Inc. d/b/a Driggs Research International d/b/a STOR Technologies d/b/a The So Company (dkt. 38), Holland & Knight LLP (dkt. 46), Rokk Solutions LLC (dkt. 49), Descrybe, LLC (dkt. 44), and 9208 Lee Avenue, LLC and Parrish Law Firm, PLLC (dkt. 41), and **ORDER** the Defendants to **ANSWER** the Complaint within fourteen (14) days.

Dated: March 30, 2026

Respectfully submitted

/s/ Louis Antonacci

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CERTIFICATE OF SERVICE

I hereby certify that I filed this Opposition with the Court's CM/ECF system, which caused it to be served on all counsel of record.

Dated: March 30, 2026

Respectfully submitted

/s/ Louis Antonacci

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