

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF FLORIDA
~~Pensacola~~ Pensacola DIVISION

Amended

CIVIL RIGHTS COMPLAINT FORM
TO BE USED BY PRO SE (NON-PRISONER) LITIGANTS IN ACTIONS
UNDER 28 U.S.C. § 1331 or § 1346 OR 42 U.S.C. § 1983

Mark Reed Rohlman

(Enter full name of Plaintiff(s))

vs.



CASE NO: 3:08cv182MCR/MD
(To be assigned by Clerk)

State of Florida

Santa Rosa County Board of County Commissioners
Santa Rosa County Planning and zoning department
Santa Rosa County local Planning board
Santa Rosa County Bldg Inspection department

(Enter name and title of each Defendant.)

If additional space is required, use the
blank area below and directly to the right.)

See attached pages for complete list

ANSWER ALL QUESTIONS ON THE FOLLOWING PAGES:

U.S. DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
2008 JUN 16 PM 12:21
tg

I. PLAINTIFF:

State your full name and full mailing address in the lines below.

Name of Plaintiff: Mark Bohman
Mailing address: 18981 NW 76th Avenue
Alachua FL 32615-7590

II. DEFENDANT(S):

State the name of the Defendant in the first line, official position in the second line, place of employment in the third line, and mailing address. Do the same for every Defendant:

- (1) Defendant's name: State of Florida
Official position: Governor
Employed at: See Attached
Mailing address: documentation
Tallahassee FL
- (2) Defendant's name: Santa Rosa County Board of County Commissioners
Official position: Commissioners
Employed at: Santa Rosa County & State of FL
Mailing address: See Attached
documentation
- (3) Defendant's name: Santa Rosa County planning and zoning department
Official position: Director
Employed at: Santa Rosa County
Mailing address: See Attached
Documentation
- (4) Defendant's name: Santa Rosa County Local Planning Board
Official position: Government Agency
Employed at: Santa Rosa County Government
Mailing address: See Attached
Documentation

ATTACH ADDITIONAL PAGES HERE TO NAME ADDITIONAL DEFENDANTS

See Attached ² pages for complete list

III. STATEMENT OF FACTS:

State briefly the FACTS of this case. Describe how each Defendant was involved and what each person did or did not do which gives rise to your claim. In describing what happened, state the names of persons involved, dates, and places. Do not make any legal arguments or cite to any cases or statutes. You must set forth separate factual allegations in separately numbered paragraphs. You may make copies of this page if necessary to supply all the facts. Barring extraordinary circumstances, no more than five (5) additional pages should be attached. (If there are facts which are not related to this same basic incident or issue, they must be addressed in a separate civil rights complaint.)

the same transaction, occurrence or series of transactions or occurrences.

(see attached documents)

On JANUARY 25, 2007 Plaintiff appeared before Santa Rosa County, County Commissioners during a regularly scheduled rezoning meeting. Plaintiff paid all the necessary fees and filed all the documents required by the State of Florida and Santa Rosa County to apply for a small scale rezoning from Residential (R-1) to Highway Commercial Zoning (HCD) zoning on the piece of property located at 2580 East Bay Blvd, Navarre FL 32566. Santa Rosa County parcel ID # 12-25-27-0000-01319-0000. - Plaintiff is a U.S. citizen that lived in Santa Rosa County Florida from 1989-2008. Plaintiff purchased discussed property in 2005 with the intention of rezoning it to HCD zoning in order to build a hurricane proof solar powered health food store that served solar cooked foods thru a drive thru window & Delivery - Discussed property is on a highway CR-399 -

3 see attached complaint

IV. STATEMENT OF CLAIMS:

State what rights under the Constitution, laws, or treaties of the United States you claim have been violated. Be specific. Number each separate claim and relate it to the facts alleged in Section III. If claims are not related to the same basic incident or issue, they must be addressed in a separate civil rights complaint.

the Federally protected Rights to
1) Equal protection under 14C
2) Right to Liberty
3) DUE process
Along with various torts

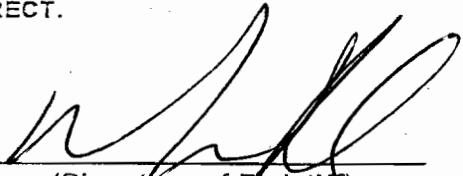
V. RELIEF REQUESTED:

State briefly what relief you seek from the Court. Do not make legal arguments or cite to cases/ statutes.

1) Legal Relief
2) Equitable relief
3) injunctive relief

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING STATEMENTS OF FACT, INCLUDING ALL CONTINUATION PAGES, ARE TRUE AND CORRECT.

6/11/08
(Date)


(Signature of Plaintiff)

Amended Complaint
UNITED STATES FEDERAL COURT
FLORIDA NORTHERN District,
ELEVENTH CIRCUIT
PENSACOLA DIVISION

This is a civil action by

Plaintiff;

MARK ROHLMAN against

Defendants;

(1) STATE OF FLORIDA;

(1a) SANTA ROSA COUNTY FLORIDA

(1a-1) SANTA ROSA COUNTY BOARD OF COUNTY COMMISSIONERS;

(1a-2) SANTA ROSA COUNTY PLANNING AND ZONING DEPT;

(1a-3) SANTA ROSA COUNTY LOCAL PLANNING BOARD;

(1a-4) SANTA ROSA COUNTY AVIATION ADVISORY COUNCIL;

(1a-5) THE CIRCUIT COURT OF THE 1ST JUDICIAL CIRCUIT OF FLORIDA;

(1a-6) SANTA ROSA COUNTY ATTORNEY;

(1a-7) SANTA ROSA COUNTY ADMINISTRATIVE DEPARTMENT

(2) HOLLEY NAVARRE WATER SYSTEM INC.;

(3) BAY POINTE HOMES INC.;

(4) UNITED STATES OF AMERICA;

(4a) THE DEPARTMENT OF JUSTICE

(4a-1) FEDERAL BUREAU OF INVESTIGATION

(4b) THE U.S. DEPARTMENT OF DEFENSE

(4b-1) U.S. HOMELAND SECURITY DEPARTMENT

(4b-2) UNITED STATES DEPARTMENT OF NAVY

(5) STATE OF GEORGIA;

(5a) CLAYTON COUNTY GEORGIA SHERRIF

(5b) GWINNET COUNTY GEORGIA SHERRIF

(6) THE FLORIDA BAR ASSOCIATION

(7) STATE OF NEW MEXICO

(7a) NEW MEXICO STATE PARKS DIVISION, ENERGY, MINERALS &
NATURAL RESOURCES DEPARTMENT

Plaintiff,

MARK ROHLMAN, (Pro Se), sues jointly and severally the following defendants for multiple violations of U.S.C. 42 section 1983, conspiracy to violate U.S.C. 42 section 1983 and associated torts. Jurisdiction is governed by 28 U.S.C. section 1331 granting Federal District Court original jurisdiction.

Defendants;

(1) STATE OF FLORIDA; For actual damages of three (3) million dollars (\$3,000,000.00) and punitive damages of one hundred million dollars (\$100,000,000.00). Along with, and due to the illegal activities of the following agents of defendant **(1)** State of Florida as Respondent Superior;

(1a) SANTA ROSA COUNTY FLORIDA; for actual damages of three million dollars (\$3,000,000.00) and punitive damages of fifty million dollars (\$50,000,000.00) along with, and due to the illegal activities of the following agents of Santa Rosa County as Respondent Superior;

(1a-1) SANTA ROSA COUNTY FLORIDA BOARD OF COUNTY COMMISSIONERS; for equitable remedy of granting plaintiff HCD zoning, actual damages of three million dollars (\$3,000,000.00) and punitive damages of twenty-five million dollars (\$25,000,000.00) The following persons operating under the color of law are responsible for and/or participated in the alleged torts.

(1a-1a) JOHN BROXSON; for actual damages of three million dollars (\$3,000,000.00) and punitive damages of ten million dollars (\$10,000,000.00).

(1a-1b) TOM STEWART for actual damages of three million dollars (\$3,000,000.00) and punitive damages of ten million dollars (\$10,000,000.00).

(1a-1c) GORDON (Tub) GOODIN for actual damages of three million dollars (\$3,000,000.00) and punitive damages of one hundred million dollars (\$100,000,000.00).

(1a-1d) ROBERT A. (Bob) COLE for actual damages of three million dollars (\$3,000,000.00) and punitive damages of ten million dollars (\$10,000,000.00).

(1a-1e) W.D. (Don) SALTER for actual damages of three million dollars (\$3,000,000.00) and punitive damages of ten million dollars (\$10,000,000.00).

(1a-2) SANTA ROSA COUNTY FLORIDA PLANNING AND ZONING DEPARTMENT; for actual damages of three million dollars (\$3,000,000.00) and punitive damages of ten million dollars (\$10,000,000.00). The following persons were responsible for and/or involved in the alleged torts.

(1a-2a) Betty Faulkenberry

(1a-2b) Shawn Ward

(1a-3) SANTA ROSA COUNTY FLORIDA LOCAL PLANNING BOARD; for actual damages of three million dollars (\$3,000,000.00) and punitive damages of five million dollars (\$5,000,000.00). The following persons were responsible for and/or involved in the alleged torts.

(1a-3a) Ferdinand Salomon

(1a-3b) Donald Norris

(1a-3c) Jim Waite

(1c-3d) Bill Seelmann

(1c-3e) Louis Cassida

(1c-3f) Jack Bonney

(1c-3g) Randy Allen

(1c-3h) Tina Monie

(1c-3i) William Merrill

(1c-3j) Ken Naylor

(1a-4) SANTA ROSA COUNTY FLORIDA AVIATION ADVISORY COUNCIL; for actual damages of three million dollars (\$3,000,000.00) and punitive damages of five million dollars (\$5,000,000.00). The following persons were responsible for and/or involved in the alleged torts.

(1a-4a) Marty Martin

(1a-5) THE CIRCUIT COURT OF THE 1ST JUDICIAL CIRCUIT OF FLORIDA; for punitive damages of fifty million dollars (\$50,000,000.00).

The following persons were responsible for and/or involved in the alleged torts.

(1a-5a) Magistrate Judge Gary Bergosh

(1a-5b) Judicial Assistant Krista Adams

(1a-6) SANTA ROSA COUNTY FLORIDA ATTORNEY THOMAS DANNHEISSER; for actual damages of three million dollars (\$3,000,000.00) and punitive damages of fifty million dollars (\$50,000,000.00).

(1a-7) SANTA ROSA COUNTY ADMINISTRATIVE SERVICES DEPARTMENT; for actual damages of three million dollars (\$3,000,000.00) and punitive damages of one hundred million dollars (\$100,000,000.00).

(2) HOLLEY NAVARRE WATER SYSTEM INC.;

for equitable remedy of moving plaintiffs water tap and sewer tap to where plaintiff prefers it to have been put in the first place, actual damages of three million dollars (\$3,000,000.00) and punitive damages of ten million dollars (\$10,000,000.00)

The following persons were responsible for and/or involved in the alleged torts.

- (2a) Ken Walker
- (2b) Tammy Beotch
- (2c) installer (a)
- (2d) installer (b)

(3) BAY POINTE HOMES CORPORATION;

for actual damages of three million dollars (\$3,000,000.00), punitive damages of ten million dollars (\$10,000,000.00), and the equitable remedy of estoppels on any further residential development in Harvell's Crossing Subdivision and the condemnation of every house in Harvell's Crossing Subdivision.

The following persons were responsible for or involved in the alleged torts.

- (3a) Mike Stovall CEO and Executive Director Bay Pointe Homes Inc.

(4) UNITED STATES OF AMERICA;

along with, and due to the illegal activities of the following agents of defendant (4) United States Of America for actual damages of three million dollars (\$3,000,000.00) and punitive damages of one hundred million dollars (\$100,000,000.00). The following agents of defendant (4) were responsible for and/or involved in alleged torts.

(4a) THE DEPARTMENT OF JUSTICE for punitive damages of twenty five million dollars (\$25,000,000.00). The following agents/offices of The Department of Justice were responsible for or involved in alleged torts.

(4a-1) THE FEDERAL BUREAU OF INVESTIGATION;

for punitive damages of twenty five million dollars (\$25,000,000.00). The following agents/offices of the FBI were responsible for or involved in alleged torts.

- (4a-1a) Washington DC phone agent
- (4a-1b) Washington DC desk agent
- (4a-1c) Washington DC Emergency e-mail system Chain of Command
- (4a-1d) Agent Phillip Bonadonna

PENSACOLA FLORIDA FBI OFFICE;

- (4a-1e) Pensacola phone agent
- (4a-1f) Pensacola desk investigator/agent

JACKSONVILLE FLORIDA FBI OFFICE;

- (4a-2g) Jacksonville phone agent
- (4a-1h) Jacksonville desk investigator/agent

(4b) U.S. DEPARTMENT OF DEFENSE;

for punitive damages of fifty million dollars (\$50,000,000.00).

(4b-1) U.S. HOMELAND SECURITY DEPARTMENT;

for punitive damages of twenty five million dollars (\$25,000,000.00).

(4b-2) UNITED STATES DEPARTMENT OF NAVY;
for punitive damages of twenty five million dollars (\$25,000,000.00).

(5) STATE OF GEORGIA;

Along with, and due to the illegal activities of the following agents of defendant **(5)** State of Georgia for punitive damages of twenty five million dollars (\$25,000,000.00). The following agents of defendant **(5)** were responsible for and/or involved with alleged torts.

(5a) CLAYTON COUNTY GEORGIA SHERRIF;
for punitive damages of twenty five million dollars (\$25,000,000.00). The following agents of defendant **(5a)** were responsible for and/or involved in the alleged torts.

- (5a-1) Responding deputy A
- (5a-2) Responding deputy B
- (5a-3) Clayton County GA 911 operator

(5b) GWINNET COUNTY GEORGIA SHERRIF;
for punitive damages of twenty five million dollars (\$25,000,000.00). The following agents of defendant **(5b)** were responsible for and/or involved with the alleged torts.

- (5b-1) Responding deputy A
- (5b-2) Responding deputy B
- (5b-3) Gwinnett County GA 911 operator

(6) THE FLORIDA BAR ASSOCIATION;

For punitive damages of twenty five million dollars (\$25,000,000.00). The following agents of defendant **(6)** were responsible for and/or involved with the alleged torts
defendant **(1a-6)** Florida First Circuit Judge Gary Bergosh
defendant **(1a-5)** County Attorney Thomas Dannheisser

(7) STATE OF NEW MEXICO;

For punitive damages of fifty thousand dollars (\$50,000.00)

(7a) NEW MEXICO STATE PARKS DIVISION, ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

For punitive damages of fifty thousand dollars (\$50,000.00).The following agent of defendant **(7a)** were responsible for and/or involved with the alleged torts

- (7a-1) Elephant Butte State Park gate agent

LIST OF CHARGES AND COUNT TOTALS;

CHARGE #1: VIOLATION OF THE CONSITUTIONAL RIGHT TO EQUAL PROTECTION UNDER THE LAW - 3 COUNTS

CHARGE #2: VIOLATION OF THE CONSTITUTIONAL RIGHT OF DUE PROCESS – 7 COUNTS

CHARGE #3: VIOLATION OF THE CONSTITUTIONAL RIGHT TO LIBERTY – 1 COUNT

CHARGE #6: DESTRUCTION OF EVIDENCE - 3 COUNTS

CHARGE #4: CONSPIRACY TO VIOLATE CONSTITUTIONAL RIGHT TO EQUAL PROTECTION UNDER THE LAW - 6 COUNTS

CHARGE #5: CONSPIRACY TO VIOLATE THE CONSTITUTIONAL RIGHT OF DUE PROCESS - 8 COUNTS

CHARGE #6: CONSPIRACY TO VIOLATE THE CONSTITUTIONAL RIGHT TO LIBERTY - 6 COUNTS

CHARGE #7: MALFEASANCE - 6 COUNTS

CHARGE #8: DESTRUCTION OF EVIDENCE - 3 COUNTS

CHARGE #9: CONSPIRACY TO DESTROY EVIDENCE - 4 COUNTS

CHARGE #10: NEGLIGENCE - EIGHT NINE (91) COUNTS

CHARGE #11: VIOLATION OF UNITED STATES OF AMERICA FEDERAL ZONING STATUTE - 4 COUNTS

CHARGE #12: VIOLATION OF SANTA ROSA COUNTY FLORIDA ZONING ORDINANCE - 4 COUNTS

CHARGE #13: EXTORTION - 2 COUNTS

CHARGE #14: WITNESS INTIMIDATION - 3 COUNTS

CHARGE #15: CONSPIRACY TO INTIMIDATE A WITNESS - 4 COUNTS

CHARGE #16: PROSECUTORIAL MISCONDUCT 4 COUNTS COUNTS

CHARGE #17: RECKLESS PUBLIC ENDANGERMENT 3 COUNTS

CHARGE #18 OBSTRUCTION OF JUSTICE 4 COUNTS

CHARGE # 19 CONSPIRACY TO OBSTRUCT JUSTICE – 8 COUNTS

CHARGE # 20 ATTEMPTED MURDER – 1 COUNT

CHARGE #21 CONSPIRACY TO ATTEMPT MURDER – 4 COUNTS

Distributed as follows;

CHARGE ONE (CH1)*: VIOLATION OF THE CONSTITUTIONAL RIGHT TO EQUAL PROTECTION UNDER LAW - THREE (3) COUNTS

[Paragraph 1] (CH1)*- **COUNT ONE:** Plaintiff, Mark Rohlman, charges defendant (1a-1) Santa Rosa County Board of County Commissioners with violation of federally protected Constitutional Right to Equal Protection under Law. *The offense was committed when defendant (1a-1) adjudicated denial of plaintiff's request for HCD zoning at the public zoning hearing held*

on January 25th, 2007. Plaintiff contends that according to United States Constitution as well as Florida statutes defendant (1a-1) was obligated to provide a fair, judicious, and rational administrative process as well as official guidance to protect the welfare of the community from abusive or dangerous changes made to zoning classifications. Due to the potential for damaging a neighbors property value or quality of life, State of Florida laws mandate defendant (1a-1) provide a quasi-judicial level of scrutiny as well as defendant (1) State of Florida's express approval of any changes to Future Land Use zoning. Plaintiff contends that contrary to defendant (1) State of Florida's approval of Plaintiff's request for HCD zoning and the overwhelming facts/evidence supporting adjudication favoring R-1 to HCD rezoning approval, defendant (1a-1) made a decision that was unpredictable, lacked a rational basis, and improperly, severely damaged plaintiff. Plaintiff's request for HCD zoning was arbitrarily and capriciously denied by a clear error in judgment by defendant (1a-1). The effect of this official decision, made under the color of law, on plaintiff is a violation of the Constitutional Right to Equal Protection under Law according to 42 U.S.C.1983. Defendant (1a-1) relied on Florida Statutes and county ordinances to permit other citizens in the same circumstance as plaintiff, i.e. request by property owning citizen on this section of highway to have R-1 to HCD rezoning approved by defendant (1a-1). These same statutes were used by defendant (1a-1) to capriciously, arbitrarily, and maliciously deny approval of plaintiff's request for R-1 to HCD rezoning. Currently plaintiff is "one and only"(arbitrary and capricious) property to have NC zoning restrictions among over 100 HCD zoned properties on the same stretch of highway. Based on above mentioned facts plaintiff contends his constitutional right to Equal Protection under law was abridged by defendant (1a-1).

[Paragraph 2] (CH1)*- **COUNT TWO:** Plaintiff, Mark Rohlman, charges defendant (5a) Clayton County Georgia Sheriff with violation of his federally protected Constitutional right to Equal Protection under Law. *Plaintiff contends the offense occurred on February 1, 2008 when plaintiff called defendant (5a) for assistance. Plaintiff, clearly and in detail, expressed a fear for his life and reported an attempt on his life the previous night (name, date, time, place). Defendant (5a) acted aggressively toward plaintiff and then denied any and all assistance requested by plaintiff. Defendant (5a) then put plaintiff back on the road to fend*

for himself at his greatest time of need of law enforcement's protection and investigative powers. Plaintiff further contends that Equal Protection under the Law means if other citizens who call for help in a similar situation mandate a report be generated by the officer's proper normal procedure's then by definition the plaintiff was not treated with Equal Protection under Law. If a citizen expresses a fear for their life and reports an attempt on their life there is a legal obligation by the law enforcement officer to generate a report for possible further investigation by the officer involved and/or for use by the plaintiff in a judicial proceeding. Plaintiff contends he did not call 911 to request a deputy's assistance as a form of whining or to casually mention a mild, passing, unimportant offense. Plaintiff reported attempted murder to the deputies and received nothing more than harassment, attempts to verbally pacify plaintiff and no report.

[Paragraph 3] (CH1)* - COUNT THREE: Plaintiff, Mark Rohlman, charges the defendant (5b) Gwinnett County Georgia Sheriff with violation of his federally protected Constitutional Right to Equal Protection under Law. *Plaintiff contends that on February 1, 2008 when he called defendant (5b) for assistance he clearly and in detail, expressed a fear for his life and reported an attempt on his life the previous night (name, date, time, place), defendant (5b) acted aggressively toward plaintiff and then denied any and all assistance requested by the plaintiff, and put plaintiff back on the road to fend for himself at his greatest time of need of law Enforcement's protection and investigative powers. Plaintiff further contends that Equal Protection under the Law means if American citizens who call for help in a similar situation mandate a report be generated by the officer's proper normal procedure's then by definition the plaintiff was not treated with Equal Protection under Law. If a citizen expresses a fear for their life and reports an attempt on their life there is a legal obligation by the law enforcement officer to generate a report for possible further investigation by the officer involved and/or for use by the plaintiff in a judicial proceeding. Plaintiff contends he did not call 911 to request a deputy's assistance as a form of whining or to casually mention a mild, passing, unimportant offense. Plaintiff reported attempted murder to the deputies and received nothing more than harassment, attempts to verbally pacify plaintiff and no report.*

CHARGE TWO (CH2)*: VIOLATION OF THE CONSITUTIONAL RIGHT OF DUE PROCESS - FIVE (5) COUNTS

[Paragraph 4] (CH2)*- **COUNT ONE:** Plaintiff, Mark Rohlman, charges the defendant (1a-1) Santa Rosa County Board of County Commissioners with violation of his federally protected Constitutional Right of Due Process. *The offense was committed when defendant (1a-1) adjudicated denial of HCD zoning at the quasi-judicial public zoning hearing on January 25th, 2007. Plaintiff contends that he was denied the right of due process when defendant (1a-1c) County Commissioner Gordon Goodin was permitted by the remaining four defendant County Commissioners, defendants 1a-1a thru 1a-1e, to reduce the statutory requirement for a five (5) person adjudication process down to a one (1) person referendum. This one person [defendant (1a-1c) Gordon Goodin] decided against HCD approval on whim of cabal mandate. The decision to deny HCD zoning by defendant (1a-1) was obviously made prior to the public hearing on January 25th, 2007, therefore, by definition plaintiff's due process was abridged.*

[Paragraph 5] (CH2)*- **COUNT TWO:** Plaintiff, Mark Rohlman, charges defendant (1a-1) Santa Rosa County Florida Board of County Commissioners with violation of the federally protected Constitutional Right of Due Process. *The offense was committed when defendant (1a-1) adjudicated denial of HCD zoning at the quasi-judicial public zoning hearing on January 25th, 2007. Plaintiff contends that he was denied the right of due process when defendant (1a-1) ignored any and all evidence in favor of HCD zoning and provided no legitimate reason for denial of HCD zoning and yet defendant (1a-1) adjudicated a decision to deny HCD zoning based on whim. Due Process requires defendant (1a-1) to vote after deliberative discussion on the facts and evidence presented to defendant (1a-1). Plaintiff's right to do process was abridged because the deliberative discussion of pertinent evidence never occurred during the hearing The decision to deny HCD zoning by defendant (1a-1) was obviously made prior to the hearing, therefore by definition plaintiff's due process was abridged.*

[Paragraph 6] (CH2)*- **COUNT THREE:** Plaintiff, Mark Rohlman, charges defendant (1a-1) Santa Rosa County Florida Board of County Commissioners with violation of the federally protected Constitutional Right of Due Process. *The offense was committed when*

defendant (1a-1) destroyed interrogatories submitted by plaintiff and served properly to defendants (1a-1a thru 1a-1e) on October 5, 2007. Defendant (1a-1) as a group either lied to or colluded with defendant (1a-6) Circuit Court of the First Judicial Circuit of Florida as defendant (1a-1) claimed they never received the interrogatories from plaintiff. Plaintiff contends his Constitutional Right of Due Process was abridged by the acts of defendant (1a-1).

[Paragraph 7] (CH2)*- **COUNT FOUR:** Plaintiff, Mark Rohlman, charges defendant (1a-6) Circuit Court of the 1st Judicial Circuit of Florida with violation of the federally protected Constitutional Right of Due Process. *The offense was committed when defendant (1a-6) allowed defendant (1a-1) Santa Rosa County Florida Board of County Commissioners to ignore then lie about interrogatories properly submitted by the plaintiff for use in CIRCUIT COURT OF THE FIRST JUDICIAL CIRCUIT IN AND FOR SANTA ROSA COUNTY, FLORIDA Case No.2007-1044-CA before defendant (1a-6). Plaintiff contends his Constitutional Right of Due Process was abridged by the acts of defendant (1a-6).*

[Paragraph 8] (CH2)*- **COUNT FIVE:** Plaintiff, Mark Rohlman, charges defendant (1a-5) Circuit Court of the 1st Judicial Circuit of Florida with violation of federally protected Constitutional Right of Due Process. *The offense was committed when defendant (1a-5) claimed to have "lost" the package of evidence submitted by the plaintiff in support of his motion for summary judgment on January 16, 2008 that was before defendant (1a-5) . Plaintiff contends his Constitutional Right of Due Process was abridged by the acts of defendant (1a-5).*

CHARGE THREE (3)*: VIOLATION OF THE CONSITUTIONAL RIGHT TO LIBERTY - ONE (1) COUNT

[Paragraph 9] (CH3)*- **COUNT ONE:** Plaintiff, Mark Rohlman, charges defendant (a-1) Santa Rosa County Florida Board of County Commissioners with violation of the federally protected Right to Liberty. The offense was committed when defendant (1a-1) adjudicated denial of HCD zoning at the public zoning hearing on January 25th, 2007. *Plaintiff contends that contrary to overwhelming facts/evidence supporting and favoring R-1 to HCD rezoning decision, defendant made a decision that was unpredictable and lacked a rational basis. Plaintiff's request for HCD zoning was arbitrarily and capriciously denied by a clear*

error in judgment by defendant. The effect of this aberrant official decision, made under color of law, on plaintiff is a violation of plaintiff's federally protected Constitutional Right to Liberty. Plaintiff bought discussed property with intent and rightful expectation of making it into his dream business. When defendant (1a-1) improperly denied HCD zoning, the plaintiff was improperly denied of his liberty to make a living at the legal business of his choice. The plaintiff has been forced by an improper zoning adjudication by defendant (1a-1) to leave behind the opportunity for retiring into his dream business.

CHARGE FOUR (4)*: CONSPIRACY TO VIOLATE THE CONSTITUTIONAL RIGHT TO EQUAL PROTECTION UNDER THE LAW - SIX (6) COUNTS

[Paragraph 10] (CH4)*- **COUNT ONE:** Plaintiff, Mark Rohlman, charges defendant (1) State of Florida with conspiracy to violate the Constitutional Right to Equal Protection under Law. *Plaintiff alleges that the defendant (1) was aware of and complicit in the longstanding history of improper activity that has been taking place in Santa Rosa County government for decades and conspired with other defendants to pursue the continuation of the cabal that currently operates the entire county government. This wrongheaded decision to deny citizen's of Santa Rosa County Florida Equal Protection under the Law was agreed to amongst various defendants that were fully aware of the evidence clearly supporting an adjudication in favor of HCD approval. The evidence shows and common sense says that this many educated people in key regulatory positions of government would not make so many improper decisions in unison unless the fear of justice has been removed. They did it because they have been conspiring blatantly and successfully for years with no oversight or consequences.*

[Paragraph 11] (CH4)*- **COUNT TWO:** Plaintiff, Mark Rohlman, charges defendant (1a-1) Santa Rosa County Florida Board of County Commissioners with conspiracy to violate the Constitutional Right to Equal Protection Under Law. *Plaintiff alleges defendant (1a-1) conspired with various other defendants to orchestrate a conspiracy to violate the plaintiff's Constitutional Right to Equal Protection Under the Law. Plaintiff contends that the unsupported arbitrary and capricious decision to adjudicate denial of HCD zoning was made and agreed to by multiple defendants before the public zoning hearing on January 25,*

2007 started. This improper decision was agreed to amongst various defendants that were fully aware of the evidence clearly supporting adjudication in favor of HCD approval. The evidence shows and common sense says that this many educated people in key regulatory positions of government would not make so many improper decisions in unison unless the fear of justice has removed. They did it because they have been conspiring successfully for years with no oversight or consequences.

[Paragraph 12] **(CH4)*- COUNT THREE:** Plaintiff, Mark Rohlman, charges defendant **(1a-2)** Santa Rosa County Planning and Zoning Department with conspiracy to violate plaintiff's federally protected Constitutional Right to Equal Protection Under the Law. *Plaintiff alleges that defendant (1a-2) conspired with various other defendants to orchestrate a conspiracy to violate plaintiff's Constitutional Right to Equal Protection Under the Law. Plaintiff contends that the unsupported arbitrary and capricious decision to adjudicate denial of HCD zoning was made and agreed to by multiple defendants prior to the start of the public zoning hearing on January 25, 2007. These improper decisions were agreed to amongst various defendants whom were fully aware of the evidence clearly supporting adjudication in favor of HCD zoning approval. The evidence shows and common sense says that this many educated people in key regulatory positions of government would not make so many improper decisions in unison unless the fear of justice has been removed. They did it because they have been conspiring successfully for years with no oversight or consequences.*

[Paragraph 13] **(CH4)*- COUNT FOUR:** Plaintiff, Mark Rohlman, charges the defendant **(1a-3)** Santa Rosa County Local Planning Board with conspiracy to violate plaintiff's Constitutional Right to Equal Protection Under Law. *Plaintiff alleges that defendant (1a-3) conspired with various other defendants to orchestrate a conspiracy to violate the plaintiff's Constitutional Right to Equal Protection Under the Law. Plaintiff contends that the unsupported arbitrary and capricious decision to adjudicate denial of HCD zoning was made and agreed to by multiple defendants prior to the start of the Local Planning Board's public zoning hearing on February 1, 2007. These improper decisions were agreed to amongst various defendants whom were fully aware of the evidence clearly supporting adjudication in favor of HCD zoning approval. The evidence shows and common sense says that this many educated*

people in key regulatory positions of government would not make so many improper decisions in unison unless the fear of justice is removed. They did it because they have been conspiring successfully for years with no oversight or consequences.

[Paragraph 14] **(CH4)*- COUNT FIVE:** Plaintiff, Mark Rohlman, charges the defendant **(1a-4)** Santa Rosa County Aviation Advisory Council with conspiracy to violate plaintiff's Constitutional Right to Equal Protection under Law. *Plaintiff alleges that defendant (1a-4) conspired with various other defendants to orchestrate a conspiracy to violate the plaintiff's federally protected Constitutional Right to Equal Protection under Law. Plaintiff contends that the unsupported, arbitrary and capricious decision to adjudicate against HCD zoning was made and agreed to by multiple defendants prior to the start of the public zoning hearing on February 1, 2007. These improper decisions were agreed to amongst various defendants whom were fully aware of the evidence clearly supporting adjudication in favor of HCD zoning approval. The evidence shows and common sense says that this many educated people in key regulatory positions of government would not make so many improper decisions in unison unless the fear of justice is removed. They did it because they have been conspiring successfully for years with no oversight or consequences.*

[Paragraph 15] **(CH4)*- COUNT SIX:** Plaintiff, Mark Rohlman, charges defendant **(1a-6)** Santa Rosa County Florida attorney with conspiracy to violate the federally protected Constitutional Right to Equal Protection under the Law. *Plaintiff alleges that defendant (1a-6) conspired with various other defendants to orchestrate a conspiracy to violate the plaintiff's Constitutional Right to Equal Protection under Law. Plaintiff contends that the unsupported arbitrary and capricious decision to adjudicate against HCD approval was made and agreed to by multiple defendants prior to the start of public zoning hearing on January 25, 2007. These improper decisions were agreed to amongst various defendants that were fully aware of the evidence clearly supporting an adjudication in favor of HCD approval. The evidence shows and common sense says that this many educated people in key regulatory positions of government would not make so many improper decisions in unison unless the fear of justice has removed. They did it because they have been conspiring for years with no oversight.*

CHARGE FIVE (5)*: CONSPIRACY TO VIOLATE THE CONSTITUTIONAL RIGHT OF DUE PROCESS - EIGHT (8) COUNTS

[Paragraph 16] (CH5)*- **COUNT ONE:** Plaintiff, Mark Rohlman, charges defendant (1) State of Florida with conspiracy to violate the plaintiff's Constitutional Right of Due Process. *Plaintiff alleges that defendant (1) was aware of the longstanding historical Lack of Due Process taking place in Santa Rosa County government for decades and conspired with various of the defendants to allow the continuation and preservation of the cabal that currently operates the entire county government. The county cabal worked to benefit Florida's political machine at the state so it was ignored.*

[Paragraph 17] (CH5)*- **COUNT TWO:** Plaintiff, Mark Rohlman, charges defendant (1a-1) Santa Rosa County Florida Board of County Commissioners with conspiracy to violate plaintiff's Constitutional Right of Due Process. *Plaintiff alleges that defendant (1a-1) conspired with various other defendants to orchestrate a conspiracy to violate the plaintiff's Constitutional Right of Due Process. The conspirators agreed on the outcome of the January 25th, 2007 public zoning meeting before the meeting started, therefore, by definition the plaintiff's right of Due Process was taken away completely by the conspirator's.*

[Paragraph 18] (CH5)*- **COUNT THREE:** Plaintiff, Mark Rohlman, charges defendant (1a-2) Santa Rosa County Planning and Zoning Department with conspiracy to violate the plaintiff's federally protected Constitutional Right of Due Process. *Plaintiff alleges defendant (1a-2) conspired with various other defendants to orchestrate a conspiracy to violate plaintiff's Constitutional Right of Due Process. The conspirators agreed on the outcome of the January 25th, 2007 public meeting before the meeting started, therefore plaintiff's right of Due Process was taken away completely by the conspirator's.*

[Paragraph 19] (CH5)*- **COUNT FOUR:** Plaintiff, Mark Rohlman, charges defendant (1a-3) Santa Rosa County Local Planning Board with conspiracy to violate plaintiff's Constitutional Right of Due Process. *Plaintiff alleges that defendant (1a-3) conspired with various other defendants to orchestrate a conspiracy to violate plaintiff's Constitutional Right of Due Process. Plaintiff contends the conspirators agreed on the outcome*

of the January 25th, 2007 public meeting before the meeting even started, therefore by definition the Plaintiff's right of Due Process was taken away completely by the conspirator's.

[Paragraph 20] **(CH5)*- COUNT FIVE:** Plaintiff, Mark Rohlman, charges defendant **(1a-4)** Santa Rosa County Aviation Advisory Council with conspiracy to violate plaintiff's Constitutional Right of Due Process. *Plaintiff alleges that defendant (1a-4) conspired with various other defendants to orchestrate a conspiracy to violate plaintiff's Constitutional Right of Due Process. Plaintiff contends the conspirators agreed on the outcome of the February 1, 2007 public zoning meeting before the meeting even started, therefore by definition, the plaintiff's right of Due Process was denied completely by the conspirator's.*

[Paragraph 21] **(CH5)*- COUNT SIX:** Plaintiff, Mark Rohlman, charges the defendant **(1a-5)** Circuit Court of the 1st Judicial Circuit of Florida with conspiracy to violate the plaintiff's Constitutional Right of Due Process. *Plaintiff alleges the offense was committed when defendant (1a-5) allowed defendant (1a-1) Santa Rosa County Florida Board of County Commissioners to ignore, then lie about interrogatories properly submitted by plaintiff for use in action before defendant (1a-5). Plaintiff alleges defendant (1a-5) conspired with various defendants to orchestrate a conspiracy to violate plaintiff's Constitutional Right of Due Process..*

[Paragraph 22] **(CH5)*- COUNT SEVEN:** Plaintiff, Mark Rohlman, charges the defendant **(1a-6)** Santa Rosa County Florida attorney with conspiracy to violate plaintiff's Constitutional Right of Due Process. *Plaintiff alleges the offense was committed when defendants (1a-1a thru 1a-1e) conspired with defendant (1a-6) to destroy interrogatories. Defendant (1a-6) then proceeded to lie to or scheme with defendant (1a-5) Circuit Court of the First Judicial Circuit of Florida by claiming they never received the interrogatories from the plaintiff. Defendant (1a-6) conspired with various defendants to orchestrate a conspiracy to violate the plaintiff's Constitutional Right of Due Process. Plaintiff contends the conspirators agreed on the strategy of the hearing on January 16, 2007 before the hearing started, therefore by definition, plaintiff's right of Due Process was taken away completely by the conspirator's.*

[Paragraph 23] **(CH5)*- COUNT EIGHT:** Plaintiff, Mark Rohlman, charges defendant **(1a-5)** *Circuit Court of the 1st Judicial Circuit of Florida* and with conspiracy to violate the plaintiff's Constitutional Right of Due Process. *Plaintiff alleges that defendant (1a-5a) Florida First Circuit Court Judge Gary Bergosh conspired with defendant (1a-6) Thomas Dannheisser to "both lose" package of evidence plaintiff properly served to both defendants (1a-5) and (1a-6). The conspirator's motivation to "lose" the documents was to negate plaintiff's Due Process.*

CHARGE SIX (6)*: CONSPIRACY TO VIOLATE THE CONSTITUTIONAL RIGHT TO LIBERTY - SIX (6) COUNTS

[Paragraph 24] **(CH6)*- COUNT ONE:** Plaintiff, Mark Rohlman, charges defendant **(1)** State of Florida with conspiracy to violate plaintiff's Constitutional Right to Liberty. *Plaintiff alleges that defendant (1) was aware of the longstanding violations of Liberty taking place in Santa Rosa County government for decades and conspired with various defendants to allow the continuation of the cabal that currently operates the entire county government. The county cabal worked to the benefit of Florida's state government political machine so it was overlooked.*

[Paragraph 25] **(CH6)*- COUNT TWO:** Plaintiff, Mark Rohlman, charges defendant **(1a-1)** Santa Rosa County Florida Board of County Commissioners with conspiracy to violate the plaintiff's Constitutional Right to Liberty. *Plaintiff alleges that defendant (1a-1) conspired with various other defendants to orchestrate a conspiracy to violate plaintiff's Constitutional Right to Liberty. The motive was to prevent a successful business owner (interloper) from living within the cabal's thief Dom and also nipping in the bud any potential for the future necessity of potential political power sharing. Plaintiff contends that depriving the plaintiff of his Liberty to be the most powerful motivating force driving the cabal to act in such a brutal manner towards the plaintiff. The cabal was making sure plaintiff was "kept in his place" and to "let the plaintiff know that the cabal has unchecked control of the county and that the cabal can do as they please because all branches of local government and all agencies of the county including law enforcement are 'in on the act" and "for the plaintiff not to be confused*

about it".

[Paragraph 26] **(CH6)*- COUNT THREE:** Plaintiff, Mark Rohlman, charges defendant **(1a-2)** Santa Rosa County Planning and Zoning Department with conspiracy to violate the plaintiff's Constitutional Right to Liberty. *Plaintiff alleges that defendant (1a-2) conspired with various other defendants to orchestrate a conspiracy to violate plaintiff's Constitutional Right to Liberty. The motive was to prevent a successful business owner (interloper) from living within the cabal's thief Dom and also nipping in the bud any potential for the future necessity of potential political power sharing. Plaintiff contends that depriving the plaintiff of his Liberty to be the most powerful motivating force driving the cabal to act in such a brutal manner towards the plaintiff. The cabal was making sure the plaintiff was "kept in his place" and to "let the plaintiff know from that the cabal has unchecked control of the county and that the cabal can do as they please because all branches of local government and all agencies of the county including law enforcement are 'in on the act" and "for the plaintiff not to be confused about it".*

[Paragraph 27] **(CH6)*- COUNT FOUR:** Plaintiff, Mark Rohlman, charges defendant **(1a-3)** Santa Rosa County Local Planning Board with conspiracy to violate the plaintiff's Constitutional Right to Liberty. *The motive was to prevent a successful business owner (interloper) from living within the cabal's thief Dom and also nipping in the bud any potential for the future necessity of potential political power sharing. Plaintiff contends that depriving the plaintiff of his Liberty to be the most powerful motivating force driving the cabal to act in such a brutal manner towards the plaintiff. Plaintiff alleges that defendant (1a-3) conspired with various other defendants to orchestrate a conspiracy to violate the plaintiff's Constitutional Right to Liberty. The cabal was making sure the plaintiff was "kept in his place" and to "let the plaintiff know from day one that the cabal has unchecked control of the county and that the cabal can do as they please because all branches of local government and all agencies of the county including law enforcement are 'in on the act" and "for the plaintiff not to be confused about it".*

[Paragraph 28] **(CH6)*- COUNT FIVE:** Plaintiff, Mark Rohlman, charges the defendant **(1a-6)** Circuit Court of the 1st Judicial Circuit of Florida with conspiracy to violate the plaintiff's Constitutional Right to Liberty. *The motive was to prevent a successful business*

owner (interloper) from living within the cabal's thief Dom and also nipping in the bud any potential for the future necessity of potential political or judicial power sharing. Plaintiff contends that depriving the plaintiff of his Liberty to be the most powerful motivating force driving the cabal to act in such a brutal manner towards the plaintiff. Plaintiff alleges that defendant (1a-6) conspired with various defendants to orchestrate a conspiracy to violate the plaintiff's Constitutional Right to Liberty. The cabal was making sure the plaintiff was "kept in his place" and to "let the plaintiff know from day one that the cabal has unchecked control of the county and that the cabal can do as they please because all branches of local government and all agencies of the county including law enforcement are 'in on the act" and "for the plaintiff not to be confused about it".

[Paragraph 29] **(CH6)*- COUNT SIX:** Plaintiff, Mark Rohlman, charges the defendant **(1a-5)** Circuit Court of the 1st Judicial Circuit of Florida with conspiracy to violate the federally protected Constitutional Right to Liberty. *The motive was to prevent a successful business owner (interloper) from living within their thief Dom and also nipping in the bud any potential for the future necessity of potential political power sharing. Plaintiff contends that depriving the plaintiff of his Liberty to be the most powerful motivating force driving the cabal to act in such a brutal manner towards the plaintiff. Plaintiff alleges that defendant (1a-5) conspired with various other defendants to orchestrate a conspiracy to violate the plaintiff's Constitutional Right to Liberty. The cabal was making sure the plaintiff was "kept in his place" and to "let the plaintiff know that the cabal has unchecked control of the county and that the cabal can do as they please because all branches of local government and all agencies of the county including law enforcement are 'in on the act" and "for the plaintiff not to be confused".*

CHARGE SEVEN (7)*: MALFEASANCE – SIX (6) COUNTS:

[Paragraph 30] **(CH7)*- COUNT ONE:** Plaintiff, Mark Rohlman, charges defendant **(1a-3)** Santa Rosa County Local Planning Board with malfeasance. The offense was committed when defendant **(1a-3)** adjudicated denial of HCD zoning at the Local Planning Board's public zoning hearing on January 11, 2007. *Plaintiff contends that contrary to the*

overwhelming facts and evidence supporting and favoring a R-1 to HCD rezoning approval, defendant (1a-3) made a recommendation that was unpredictable and lacked a rational basis. Plaintiff's request for HCD zoning was arbitrarily and capriciously denied by a clear error in judgment by government agent defendant (1a-3). This bad decision by defendant (1a-3) damaged plaintiff severely.

[Paragraph 31] (CH7)*- **COUNT TWO:** Plaintiff, Mark Rohlman, charges defendant (1a-4) Santa Rosa County Aviation Advisory Council with malfeasance. The offense was committed when defendant (1a-4) advised defendant (1a-3) Santa Rosa County Local Planning Board that the Federally mandated APZ Clear Zone surrounding United States Navy's Holley Field *had no bearing on the decision before defendant (1a-3) on January 11, 2007. This bad decision by government agent, defendant (1a-4), damaged the plaintiff severely.*

[Paragraph 32] (CH7)*- **COUNT THREE:** Plaintiff, Mark Rohlman, charges defendant (4a) The Federal Bureau Of Investigation Headquarters with malfeasance. *Plaintiff contends the offense was committed when defendant (4a) made repeated improper decisions to ignore plaintiff's calls for help via telephone and internet from January 28th thru January 31, 2007. These improper decisions by government agent, defendant (4a), damaged the plaintiff severely.*

[Paragraph 33] (CH7)*- **COUNT FOUR:** Plaintiff, Mark Rohlman, charges defendant (5a) Clayton County Georgia Sheriff with malfeasance. *Plaintiff contends the offense was committed when defendant (5a) made repeated improper decisions to ignore the plaintiff's call for help on January 31, 2007. These improper decisions by government agent defendant (5a) damaged plaintiff severely.*

[Paragraph 34] (CH7)*- **COUNT FIVE:** Plaintiff, Mark Rohlman, charges defendant (5b) Gwinnett County Georgia Sheriff with malfeasance. *Plaintiff contends the offense was committed when defendant (5b) made repeated improper decisions by repeatedly ignoring the plaintiff's calls for help on January 31, 2007. These improper decisions by defendant (5b) damaged plaintiff severely.*

[Paragraph 35] **(CH7)*- COUNT SIX:** Plaintiff, Mark Rohlman, charges defendant **(4b-2)** *United States Navy* with malfeasance. Plaintiff contends the offense occurred when defendant **(4b-2)** received notice from defendant **(1a)** *Santa Rosa County commissioners* via the required public notification process done through defendant **(1b)** *Santa Rosa County Planning and Zoning Department* in reference to planned construction by defendant **(3)** *Bay Pointe Homes Inc.* to build *Harvell's Crossing Subdivision* in a federally mandated *Airport Clear Zone* at the end of the *United States Navy's Holley Air Field*. Defendant **(4b-2)** made the improper decision not to protest this proposed project at the obligatory preliminary approval stages statutorily mandated by defendants **(1)** *State of Florida*, **(4)** *United States of America* or their agents. The improper decision by defendant **(4b-2)** to not dispute the construction of *Harvell's Crossing Subdivision* in a *Airport Clear Zone* has damaged the plaintiff severely. Plaintiff contends that if plans for *Harvell's Crossing Subdivision* were properly denied that we would not be in court today because the family cabal would not feel compelled to protect their lovely high-end runwayfront residential development from that "unsightly commercial stuff". These improper decisions by defendant **(4b-2)** damaged the plaintiff severely.

CHARGE EIGHT (8)*: DESTRUCTION OF EVIDENCE - THREE (3) COUNTS

[Paragraph 36] **(CH8)*- COUNT ONE:** Plaintiff, Mark Rohlman, charges the defendant **(1a-1)** *Santa Rosa County Florida Board of County Commissioners* with destruction of evidence. The offense was committed when defendant **(1a-1)** destroyed interrogatories submitted by plaintiff and served properly to defendant **(1a-1)** on October 8, 2007. These legal and properly served interrogatories (five copies – one per commissioner) were destroyed by defendant **(1a-1)**. Defendant **(1a-1)** then lied to defendant **(1a-6)** *Circuit Court of the 1st Judicial Circuit of Florida* in an official court proceeding by claiming to defendant **(1a-6)** they never received interrogatories from plaintiff.

[Paragraph 37] **(CH8)*- COUNT TWO:** Plaintiff, Mark Rohlman, charges defendant **(1a-5)** *Circuit Court of the 1st Judicial Circuit of Florida* with destruction of evidence. The offense was committed when defendant **(1a-5)** "lost" the package of evidence submitted by

the plaintiff in support of his motion for summary judgment at the hearing that took place on January 16, 2008 before defendant (1a-5). These acts by defendant (1a-5) damaged the plaintiff.

[Paragraph 38] (CH8)*- **COUNT THREE:** Plaintiff, Mark Rohlman, charges the defendant (1a-7) Santa Rosa County Administration Department with destruction of evidence. The offense was committed when defendant (1a-7) improperly manipulated the DVD copies of multiple public meetings to benefit the cabal in litigation. Plaintiff asserts this was done on many occasions. These acts by defendant (1a-7) damaged the plaintiff.

CHARGE NINE (9)*: CONSPIRACY TO DESTROY EVIDENCE - FOUR (4) COUNTS

[Paragraph 39] (CH9)*- **COUNT ONE:** Plaintiff, Mark Rohlman, charges defendant (1a-1) Santa Rosa County Florida Board of County Commissioners with conspiracy to destroy evidence. The offense was committed when defendant (1a-1) conspired to destroy interrogatories submitted by the plaintiff and served properly to defendant (1a-1). Defendant (1a-1) then proceeded to conspire with defendant (1a-6) *Santa Rosa County Florida attorney* and defendant (1a-5) Circuit Court of the 1st Judicial Circuit of Florida by claiming that they never received interrogatories from plaintiff. All five (5) defendants (1a-1 thru 1a-5) lied in unison with no consequences. Conspiratorial conversation preceded and led to these acts to destroy evidence by these defendants and damaged plaintiff severely.

[Paragraph 40] (CH9)*- **COUNT TWO:** Plaintiff, Mark Rohlman, charges defendant (1a-6) *Santa Rosa County Florida attorney* with conspiracy to destroy evidence. The offense was committed when defendant (1a-6) conspired with defendant (1a-1) Santa Rosa County Florida Board of County Commissioners by claiming to have never received interrogatories from plaintiff. Defendant (1a-6) conspired with all five (5) defendants (1a-1a thru 1a-1e) to lie in unison with no consequences. Conspiratorial conversation preceded and led to the acts of these defendants which were prejudicial and damaged plaintiff.

[Paragraph 41] (CH9)*- **COUNT THREE:** Plaintiff, Mark Rohlman, charges defendant (1a-5) Circuit Court of the 1st Judicial Circuit of Florida with conspiracy to destroy evidence. The offense was committed when defendant (1a-5a) Judge Gary Bergosh and defendant (1a-5b) judicial assistant Krista Adams conspired to intentionally "lose" the package

of evidence submitted by plaintiff in support of his motion for summary judgment that was before defendant **(1a-5a)**. Conspiratorial conversation preceded and led to the acts of these defendants.

[Paragraph 42] **(CH9)*- COUNT FOUR:** Plaintiff, Mark Rohlman, charges defendant **(1a-7)** Santa Rosa County Administration Department with destruction of evidence. The offense was committed when defendant **(1a-7)** improperly manipulated the DVD copies of multiple public meetings to benefit the cabal in potential or actual future litigation. Plaintiff asserts this act was done on many occasions at the direction of or with the consent of various other conspirators. These acts by defendant **(1a-7)** damaged the plaintiff.

CHARGE TEN (10)*: NEGLIGENCE –EIGHT NINE (89) COUNTS

[Paragraph 43] **(CH10)*- COUNT ONE:** Plaintiff, Mark Rohlman, charges defendant **(1)** State of Florida with 44 counts of negligence. These charges are brought forth because defendant **(1)** was negligent in fulfilling it's statutory obligation of oversight of it's agents in this action.

[Paragraph 44] **(CH10)*- COUNT TWO:** Plaintiff, Mark Rohlman, charges defendant **(5)** State of Georgia with 6 counts of negligence. These charges are brought forth because defendant **(5)** was negligent in fulfilling it's statutory obligation of oversight of it's agents in this action.

[Paragraph 45] **(CH10)*- COUNT FOUR:** Plaintiff, Mark Rohlman, charges defendant **(4)** United States of America with 7 counts of negligence. These charges are brought forth because defendant **(4)** was negligent in fulfilling it's statutory obligation of oversight of it's agents in this action.

[Paragraph 46] **(CH10)*- COUNT FIVE :** Plaintiff, Mark Rohlman, charges defendant **(4a)** United States Department of Justice with 2 counts of negligence. These charges are brought forth because defendant **(4)** was negligent in fulfilling it's statutory obligation of oversight of it's agents in this action.

[Paragraph 48] **(CH10)*- COUNT SIX:** Plaintiff, Mark Rohlman, charges defendant **(4b)** United States Department of Defense with 2 counts of negligence.

These charges are brought forth because defendant **(4b)** was negligent in fulfilling its statutory obligation of oversight of its agents in this action.

[Paragraph 49] **(CH10)*- COUNT SEVEN:** Mark Rohlman, charges the defendant **(6)** The Florida Bar Association 24 counts of negligence. These charges are brought forth because defendant **(6)** was negligent in fulfilling statutory obligation of oversight of its agents.

[Paragraph 50] **(CH10)*- COUNT EIGHT:** Mark Rohlman, charges the defendant **(7)** State of New Mexico with 1 count of negligence. These charges are brought forth because defendant **(6)** was negligent in fulfilling its statutory obligation of oversight of its agents in this action.

[Paragraph 51] **(CH10)*- COUNT NINE:** Mark Rohlman, charges the defendant **(1a)** Santa Rosa County with 17 counts of negligence. These charges are brought forth because defendant **(1a)** was negligent in fulfilling its statutory obligation of oversight of its agents in this action.

CHARGE ELEVEN (11)*: VIOLATION OF THE UNITED STATES OF AMERICA FEDERAL ZONING LAW - FOUR (4) COUNTS

[Paragraph 52] **(CH11)*- COUNT ONE:** Plaintiff, Mark Rohlman, charges defendant **(1)** State of Florida with violation of United States of America federal zoning law. Plaintiff contends that the offense was committed when defendant **(1)** approved the Harvell's Crossing subdivision plans to be constructed in a federally mandated Clear Zone at end of the United States Navy's Holly Field runway. The defendant's improper approval of a residential subdivision in Airport Clear Zone has damaged plaintiff severely. Plaintiff contends that if Harvell's Crossing had not been built we would not be in court.

[Paragraph 53] **(CH11)*- COUNT TWO:** Plaintiff, Mark Rohlman, charges defendant **(1a-1)** Santa Rosa County Florida Board of County Commissioners with violation of United States of America federal zoning law. Plaintiff contends that the offense was committed when defendant **(1a-1)** approved plan for Harvell's Crossing Subdivision to be constructed in a federally

mandated Airport Clear Zone at end of the United States Navy Holly Field runway. The defendant's improper acts has damaged plaintiff severely. Plaintiff contends that if Harvell's Crossing had not been built we would not be in court.

[Paragraph 54] **(CH11)*- COUNT THREE:** Plaintiff, Mark Rohlman, charges defendant **(1a-2)** Santa Rosa County Planning and Zoning Department with violation of United States of America federal zoning law. Plaintiff contends that the offense was committed when defendant **(1a-2)** approved Harvell's Crossing Subdivision plans to be constructed in a federally mandated Clear Zone at end of United States Navy's Holly Field runway. Plaintiff contends that if Harvell's Crossing had not been built we would not be in court.

[Paragraph 55]**(CH11)*- COUNT FOUR:** Plaintiff, Mark Rohlman, charges defendant **(3)** Bay Pointe Homes Company with violation of United States of America federal zoning law. Plaintiff contends the offense was committed when defendant **(3)** built Harvell's Crossing Subdivision in a federally mandated Airport Clear Zone at end of United States Navy Holly Field runway. Plaintiff contends that if Harvell's Crossing had not been built we would not be in court.

CHARGE TWELVE (12)*: VIOLATION OF SANTA ROSA COUNTY FLORIDA ZONING LAW - FOUR (4) COUNTS

[Paragraph 56] **(CH12)*- COUNT ONE:** Plaintiff, Mark Rohlman, charges defendant **(1)** State of Florida with violation of Santa Rosa County Florida zoning law. Plaintiff contends that the offense was committed when defendant **(1)** approved the Harvell's Crossing subdivision plans to be constructed in a federally mandated Clear Zone at end of the United States Navy's Holly Field runway.

[Paragraph 57] **(CH12)*- COUNT TWO:** Plaintiff, Mark Rohlman, charges defendant **(1a-1)** Santa Rosa County Florida Board of County Commissioners with violation of Santa Rosa County Florida zoning law. Plaintiff contends that the offense was committed when defendant **(1a-1)** approved the Harvell's Landing subdivision plans to be constructed in a federally mandated Airport Clear Zone at end of United States Navy's Holly Field runway.

[Paragraph 58] **(CH12)*- COUNT THREE:** Plaintiff, Mark Rohlman, charges defendant **(1a-2)** Santa Rosa County Planning and Zoning Department with violation of Santa Rosa County Florida zoning law. Plaintiff contends that the offense was committed when defendant **(1a-2)** approved the Harvell's Crossing subdivision plans to be constructed in a federally mandated Airport Clear Zone at end of the United States Navy's Holly Field runway.

[Paragraph 59] **(CH12)*- COUNT FOUR:** Plaintiff, Mark Rohlman, charges defendant **(3)** Bay Pointe Homes Company with violation of Santa Rosa County Florida zoning law. Plaintiff contends that the offense was committed when defendant **(3)** built Harvell's Landing subdivision in a federally mandated Airport Clear Zone at end of the United States Navy's Holly Field runway.

CHARGE THIRTEEN (13)*: EXTORTION – TWO (2) COUNTS

[Paragraph 60] **(CH13)*- COUNT ONE:** Plaintiff, Mark Rohlman, charges defendant **(2)** Holley Navarre Water System Inc. with extortion. Plaintiff alleges the offense occurred when defendant **(2)** charged plaintiff for sewage fees that were never accrued by plaintiff as he was never hooked to the sewer line. The only way that the plaintiff could keep his water on was to pay the extortion of what ever sewerage fee defendant **(2)** felt compelled to charge the plaintiff as a payoff necessary for the privilege of continued water service. Plaintiff contends these acts by defendant **(2)** were part of the cabal's conspiracy to abridge plaintiff's Liberty. Plaintiff was damaged by these acts.

[Paragraph 61] **(CH13)*- COUNT TWO:** Plaintiff, Mark Rohlman, charges defendant **(2)** Holley Navarre Water System Inc. with extortion. Plaintiff alleges the offense occurred when defendant **(2)** demanded plaintiff pay a "service charge" to move his brand new water and sewer tap after defendant **(2)** intentionally placed them in the most unusable place on the property. The only way plaintiff could get his taps placed correctly was to pay what ever extortion "service charge" that defendant **(2)** felt compelled to extort the plaintiff as necessary for the privilege of a usable functional water and sewer tap that the plaintiff just paid \$3,500.00 for. Plaintiff contends these acts by defendant **(2)** were part of the cabal's conspiracy to abridge plaintiff's Liberty. Plaintiff was damaged.

CHARGE FOURTEEN (14)*: WITNESS INTIMIDATION - THREE (3) COUNTS

[Paragraph 62] (CH14)*- **COUNT ONE:** Plaintiff, Mark Rohlman, charges defendant (1a-1) Santa Rosa County Florida Board of County Commissioners with witness intimidation. Plaintiff asserts that the offense occurred on the morning of February 1, 2008 in Montgomery Alabama when defendant (1a-1c) Tub Goodin attempted to physically take plaintiff's evidence (tapes) and then frighten away or kill plaintiff. Fortunately plaintiff woke up before defendant (1a-1c) was able to get the benefit of surprise on him. Plaintiff was in Alabama sleeping in his car while on the run from the cabal.

[Paragraph 63] (CH14)*- **COUNT TWO:** Plaintiff, Mark Rohlman, charges defendant (1a-5) Circuit Court of the 1st Judicial Circuit of Florida with witness intimidation. Plaintiff asserts that the offense occurred on January 16, 2008 when defendant (1a-5a) Magistrate Judge Bergosh sat shoulder to shoulder and "shared documents" with defendant (1a-6) Santa Rosa County Attorney during the plaintiff's hearing on motion for summary judgment. Judge Bergosh's reason for this unusual procedure was that "his judicial assistant Krista Adams called in sick" and "defendant (1a-5a) could not find any of the court's proceedings so we could either cancel the hearing or he could share paperwork with the county attorney" It was the cabal's subtle way of telling the plaintiff that " we (the cabal) are all together against you"

[Paragraph 64] (CH14)*- **COUNT THREE:** Plaintiff, Mark Rohlman, charges defendant (4b-1) Homeland Security Department with witness intimidation. The offense occurred when defendant (4b-1) notified cabal of plaintiff's exact location. This information was gathered by defendant (4b-1) at a homeland security checkpoint in New Mexico and the information was provided to cabal so they could have one last opportunity to mousetrap plaintiff before he reached California.

CHARGE FIFTEEN (15)*: CONSPIRACY TO INTIMIDATE WITNESS - FOUR (4) COUNTS

[Paragraph 65] (CH15)*- **COUNT ONE:** Plaintiff, Mark Rohlman, charges defendant (1a-1) Santa Rosa County Florida Board of County Commissioners with conspiracy to intimidate a witness. Plaintiff asserts that the offense occurred on the morning of February 1, 2008 in Montgomery Alabama when defendant (1a-3) Tub Goodin attempted to physically take plaintiff's

evidence (tapes) and then kill plaintiff. Fortunately plaintiff woke up before defendant **(1a-1c)** Tub Goodin was able to get the jump on him. Plaintiff was sleeping in his car while on the run from the cabal. Plaintiff asserts that the cabal forced defendant (1a-3) Tub Goodin to "fix the problem he started before the entire cabal is taken into Federal Court".

[Paragraph 66] **(CH15)*- COUNT TWO:** Plaintiff, Mark Rohlman, charges defendant **(1a-1)** Santa Rosa County Florida Board of County Commissioners with conspiracy to intimidate a witness. Plaintiff asserts that the offense occurred at Lion's Beach Campground at Elephant Butte State Park in New Mexico. A stooge bully of **(1a-1)** attempted to physically prevent the plaintiff from having his day in court. It occurred on February 7, 2008 while the plaintiff was on his way to California and once again on the run from the cabal. In New Mexico the plaintiff was forced thru a homeland security checkpoint in middle America. When the plaintiff stopped for gas shortly thereafter a stooge bully walked up to the plaintiff in the parking lot and after 15 minutes of conversation that hit all the plaintiffs hot buttons (environmentalist) the stooge bully convinced the plaintiff to go to Lion's Beach where the stooge bully drained the oil from the plaintiff's truck motor in the middle of the night. By definition this offense qualifies as a conspiracy due to the number of people required to pull this mousetrap together.

[Paragraph 67] **(CH15)*- COUNT THREE:** Plaintiff, Mark Rohlman, charges defendant **(7a)** Elephant Butte State Park with conspiracy to intimidate a witness. Plaintiff asserts that the offense occurred on the night of February 7, 2007 at Lion's Beach Campground at Elephant Butte State Park in New Mexico. A stooge of **(7a)** attempted to physically prevent plaintiff from having his day in court. It occurred while the plaintiff was on his way to California and once again on the run from the cabal. In New Mexico the plaintiff was forced thru a homeland security checkpoint on interstate highway in middle America. When the plaintiff stopped for gas shortly thereafter a stooge bully walked up to the plaintiff in the parking lot and after 15 minutes of conversation that hit all the plaintiffs hot buttons (environmentalist) the stooge bully convinced the plaintiff to go to Elephant Butte State Park where the stooge bully drained the oil from the plaintiff's truck motor in the middle of the night. By definition this offense qualifies as a conspiracy due to the number of people required to pull this mousetrap together.

[Paragraph 68] **(CH15)*- COUNT FOUR:** Plaintiff, Mark Rohlman, charges defendant **(4b-1)** Homeland Security Department with conspiracy to intimidate a witness. The offense occurred on February 7, 2007 when defendant **(4b-1)** notified the cabal of plaintiff's exact location. This information was provided to the cabal so they could have one last opportunity to mousetrap the plaintiff. It occurred while the plaintiff was on his way to California and once again on the run from the cabal. In New Mexico the plaintiff was forced thru a homeland security checkpoint on interstate highway in middle America. When the plaintiff stopped for gas shortly thereafter a stooge bully walked up to the plaintiff in the parking lot and after 15 minutes of conversation that hit all the plaintiff's hot buttons (environmentalist) the stooge bully convinced the plaintiff to go to Elephant Butte State Park where the stooge bully drained the oil from the plaintiff's truck motor in the middle of the night. By definition this offense qualifies as a conspiracy due to the number of people required to pull this mousetrap together.

[Paragraph 69] **(CH15)*- COUNT FIVE:** Plaintiff, Mark Rohlman, charges defendant **(1a-5)** Circuit Court of the 1st Judicial Circuit of Florida and with conspiracy to intimidate a witness. Plaintiff asserts that the offense occurred when defendant **(1a-5a)** Judge Bergosh sat shoulder to shoulder and shared documents with the Santa Rosa County Attorney during the Plaintiff's motion for summary judgment on January 16, 2008. Judge Bergosh's reason for this unusual (prejudicial) act that goes against all rules of Due Process was "his judicial assistant Krista Adams called in sick" and "he could not find any of the court's proceedings so we could either cancel the hearing or he could share paperwork with the county attorney". It was obviously the cabal's subtle way of telling the plaintiff that "we are all together against you". Plaintiff asserts that defendant **(1a-6)** Santa Rosa County Attorney Thomas Dannheisser and defendant **(1a-5a)** Judge Gary Bergosh planned this intimidation routine before the hearing for summary judgment ever started.

CHARGE SIXTEEN (16)*: PROSECUTORIAL MISCONDUCT- FOUR (4) COUNTS

[Paragraph 70] **(CH16)*- COUNT ONE :** Plaintiff, Mark Rohlman, charges defendant **(1a-6)** Santa Rosa County Florida attorney with prosecutorial misconduct. The offense was committed when defendant **(1a-6)** lied about interrogatories submitted by the plaintiff and served properly to his clients, defendants **(1a-1a thru 1a-1e)** Santa Rosa County

Florida Board of County Commissioners, on October 8, 2007. Defendant **(1a-6)** then proceeded to lie to plaintiff and to defendant **(1a-5)** Circuit Court of the 1st Judicial Circuit by claiming his clients never received interrogatories from plaintiff.

[Paragraph 71] **(CH16)*- COUNT TWO:** Plaintiff, Mark Rohlman, charges defendant **(1a-5a)** Judge Bergosh with prosecutorial misconduct. The offense was committed when defendant **(1a-5a)** conspired with defendant **(1a-6)** *Santa Rosa County Florida attorney to ignore interrogatories properly served on defendants (1a-1a thru 1a-1e)* on October 8, 2007.

[Paragraph 72] **(CH16)*- COUNT THREE:** Plaintiff, Mark Rohlman, charges defendant **(1a-6)** *Santa Rosa County Florida attorney* with prosecutorial misconduct. The offense was committed when defendant **(1a-6)** *"lost" and then lied about* package of evidence properly submitted by plaintiff to be used on January 16, 2008 in a "hearing" for summary judgment.

[Paragraph 73] **(CH16)*- COUNT FOUR:** Plaintiff, Mark Rohlman, charges defendant **(1a-5a)** Judge Bergosh with prosecutorial misconduct. The offense was committed when defendant **(1a-5a)** conspired with defendant **(1a-5b)** judicial assistant Krista Adams to intentionally "lose" the package of evidence submitted by plaintiff in support of his motion for summary judgment that was before defendant **(1a-5a)** at a hearing on January 16, 2008.

CHARGE SEVENTEEN (17)*: RECKLESS PUBLIC ENDANGERMENT – THREE (3) COUNTS

[Paragraph 74] **(CH17)*- COUNT ONE:** Plaintiff, Mark Rohlman, charges defendant **(1a-2)** Santa Rosa County Planning and Zoning Department with reckless public endangerment. The offense was committed when defendant **(1a-2)** approved plans to build Harvell's Crossing Subdivision in an Airport Clear Zone. *The improper official recommendation by defendant (1a-2) to approve Harvell's Crossing Subdivision has recklessly endangered every Harvell's Crossing homeowner's safety as well as plaintiff's opportunity for a non-prejudicial adjudication by defendant (1a-1) Santa Rosa County Board of County Commissioners on January 25, 2007.*

[Paragraph 75] **(CH17)*- COUNT TWO:** Plaintiff, Mark Rohlman, charges defendant **(1a-4)** Santa Rosa County Aviation Advisory Council with reckless public endangerment. The offense was committed when defendant **(1a-4)** decided to recommend approval of plans to build Harvell's Crossing Subdivision in a federally mandated Airport Clear Zone. *Defendant (1a-4) has recklessly endangered every Harvell's Crossing homeowner's safety as well as plaintiff's opportunity for a non-prejudicial adjudication by defendant (1a-1) Santa Rosa County Board of County Commissioners on January 25, 2007. The improper official recommendation by defendant (1a-4) to approve Harvell's Crossing Subdivision.*

[Paragraph 76] **(CH17)*- COUNT THREE:** Plaintiff, Mark Rohlman, charges the defendant **(1a-1)** Santa Rosa County Florida Board of County Commissioners with reckless public endangerment. The offense was committed when defendant **(1a-1)** decided to recommend approval of plans to build Harvell's Crossing Subdivision in a federally mandated Airport Clear Zone. *This bad decision by defendant (1a-1) damaged plaintiff severely. The improper official decision by defendant (1a-1) to approve Harvell's Crossing Subdivision has recklessly endangered every Harvell's Crossing homeowner's safety as well as plaintiff's opportunity for a non-prejudicial adjudication by defendant (1a-1) Santa Rosa County Board of County Commissioners on January 25, 2007.*

CHARGE EIGHTEEN (18)*: OBSTRUCTION OF JUSTICE-FOUR (4) COUNTS

[Paragraph 77] **(CH18)*- COUNT ONE:** Plaintiff, Mark Rohlman, charges defendant **(4a)** The Federal Bureau Of Investigation with obstruction of justice. *Plaintiff contends the offense was committed when defendant (4a) made repeated improper decisions to ignore plaintiff's calls for help via the telephone and internet from January 28th thru February 1st 2007. These bad decisions by defendant (4a) obstructed justice and damaged plaintiff severely.*

[Paragraph 78] **(CH18)*- COUNT TWO:** Plaintiff, Mark Rohlman, charges defendant **(1a-7)** Santa Rosa County Administration Department with obstruction of justice. The offense was committed when defendant **(1a-7)** improperly manipulated the DVD copies of multiple public meetings to benefit the cabal in litigation. Plaintiff asserts this act was done on many

occasions. These acts by defendant **(1a-7)** damaged plaintiff.

[Paragraph 79] **(CH18)*- COUNT THREE:** Plaintiff, Mark Rohlman, charges defendant **(1a-6)** *Santa Rosa County Florida attorney* with obstruction of justice. The offense was committed when defendant **(1a-6)** lied about interrogatories submitted by the plaintiff and served properly to defendants **(1a-1a thru 1a-1e)**. Defendant **(1a-6)** then proceeded to lie to or conspire with defendant **(1a-5)** Circuit Court of the 1st Judicial Circuit of Florida by claiming that his clients, defendants **(1a-1a thru 1a-1e)**, never received interrogatories from plaintiff. Defendant **(1a-6)** lied along with all five (5) defendants **(1a-1a thru 1a-1e)** in unison. These acts by defendant **(1a-6)** damaged plaintiff.

[Paragraph 80] **(CH18)*- COUNT FOUR:** Plaintiff, Mark Rohlman, charges defendant **(1a-5)** Circuit Court of the 1st Judicial Circuit of Florida with obstruction of justice . The offense was committed when conspiracy between defendant **(1a-5a)** Magistrate Judge Gary Bergosh and **(1a-5b)** judicial assistant Krista Adams to intentionally lose package of evidence submitted by plaintiff in support of his motion for summary judgment that was before defendant **(1a-5a)**. These acts by defendant **(1a-5)** damaged plaintiff.

CHARGE NINETEEN (19)*: CONSPIRACY TO OBSTRUCT JUSTICE – EIGHT (8) COUNTS

[Paragraph 81] **(CH19)*- COUNT ONE:** Plaintiff, Mark Rohlman, charges defendant **(1a-4)** Santa Rosa County Aviation Advisory Council with conspiracy to obstruct justice. The offense was committed when defendant **(1a-4)** advised defendant **(1a-3)** Santa Rosa County Local Planning Board that the federally mandated APZ zoning around the United States Navy's Holley Field *had no bearing on the decision before defendant (1a-4)* at the zoning on *January 5, 2007. Defendant (1a-4) damaged plaintiff severely.*

[Paragraph 82] **(CH19)*- COUNT TWO:** Plaintiff, Mark Rohlman, charges defendant **(4a)** The Federal Bureau Of Investigation with conspiracy to obstruct justice. *Plaintiff contends the offense was committed when defendant (4a) made repeated improper decisions to ignore the plaintiff's calls for help via the telephone and internet from January 28th thru February 1st 2007. These multiple bad decisions by defendant (4a) and it's agents*

obstructed justice and could only have occurred through collusion.

[Paragraph 83] **(CH19)*- COUNT THREE:** Plaintiff, Mark Rohlman, charges the defendant **(1a-7)** Santa Rosa County Administration Department with conspiracy to obstruct justice. The offense was committed when defendant **(1a-7)** improperly manipulated the DVD copies of multiple public meetings to benefit the cabal in litigation. Plaintiff asserts these acts were an obstruction of justice and could only have been accomplished via collusion. These acts by defendant **(1a-7)** damaged plaintiff.

[Paragraph 84] **(CH19)*- COUNT FOUR:** Plaintiff, Mark Rohlman, charges the defendant **(1a-1)** Santa Rosa County Florida Board of County Commissioners with conspiracy to obstruct justice. The offense was committed when defendant **(1a-1)** participated in the improper manipulation of the DVD copies of multiple public meetings to benefit the cabal in litigation. Plaintiff asserts this act was done on many occasions. Plaintiff asserts these acts were an obstruction of justice and could only have been accomplished via collusion These improper acts by defendant **(1a-1)** damaged plaintiff.

[Paragraph 85] **(CH19)*- COUNT FIVE:** Plaintiff, Mark Rohlman, charges defendant **(1a-1)** Santa Rosa County Florida Board of County Commissioners with conspiracy to obstruct justice. The offense was committed when defendant **(1a-1)** destroyed interrogatories submitted by plaintiff and served properly to defendants **(1a-1a** thru **1a-1e)**. Defendant **(1a-1)** then proceeded to lie to defendant **(1a-5)** Circuit Court of the 1st Judicial Circuit of Florida by claiming that they never received interrogatories from plaintiff. All five (5) defendants (1a-1 thru 1a-5) lied in unison. Plaintiff asserts these acts were an obstruction of justice and could only have been accomplished via collusion These acts by defendant **(1a-1)** damaged plaintiff.

[Paragraph 86] **(CH19)*- COUNT SIX:** Plaintiff, Mark Rohlman, charges defendant **(1a-6)** *Santa Rosa County Florida attorney* with conspiracy to obstruct justice. The offense was committed when defendant **(1a-6)** lied about interrogatories submitted by plaintiff and served properly to defendants **(1a-1a** thru **1a-1e)**. Defendant **(1a-6)** then proceeded to lie to defendant **(1a-5)** Circuit Court of the 1st Judicial Circuit of Florida by claiming that his clients never received interrogatories from plaintiff. Defendant **(1a-6)** lied along with all five (5)

defendants **(1a-1a thru 1a-1e)** in unison. Plaintiff asserts these acts were an obstruction of justice and could only have been accomplished via collusion. These improper acts by defendant **(1a-5)** damaged plaintiff.

[Paragraph 87] **(CH19)*- COUNT SEVEN:** Plaintiff, Mark Rohlman, charges defendant **(1a-5)** Circuit Court of the 1st Judicial Circuit of Florida with conspiracy to obstruct justice. The offense was committed when defendants **(1a-5a)** Magistrate Judge Bergosh and **(1a-5b)** judicial assistant Krista Adams intentionally lost the package of evidence submitted by plaintiff in support of his motion for summary judgment that was before defendant **(1a-5a)**. Plaintiff asserts these improper acts were an obstruction of justice and could only have been accomplished via collusion These acts by defendant **(1a-5)** damaged plaintiff.

[Paragraph 88] **(CH19)*- COUNT EIGHT:** Plaintiff, Mark Rohlman, charges defendant **(1a-6)** *Santa Rosa County Florida Attorney* with conspiracy to obstruct justice. The offense was committed when defendant **(1a-6)** lost package of evidence submitted by plaintiff and served properly to defendant **(1a-6)** to be used in a hearing for summary judgment on January 16, 2008. Defendant **(1a-6)** pre-approved this move with defendant **(1a-5)** Circuit Court of the 1st Judicial Circuit of Florida because both in unison claimed that they either lost or never received the package of evidence from plaintiff. Plaintiff asserts these acts were an obstruction of justice and could only have been accomplished via collusion These improper acts by defendant **(1a-6)** damaged plaintiff.

CHARGE TWENTY (20)*: ATTEMPTED MURDER - ONE (1) COUNT

[Paragraph 89] **(CH20)*- COUNT ONE:** Plaintiff, Mark Rohlman, charges defendant **(1a-1c)** with attempted murder. Plaintiff asserts that the offense occurred on the morning of February 1, 2008 at 4:30 a.m. in Montgomery Alabama when defendant **(1a-1c)** Tub Goodin attempted to physically take plaintiff's evidence (tapes) and then kill plaintiff. Fortunately plaintiff woke up before defendant **(1a-1c)** Tub Goodin was able to get the jump on plaintiff. Plaintiff was sleeping in his car while on the run from the cabal. Plaintiff asserts that cabal forced defendant **(1a-1c)** Tub Goodin to "fix the problem he started before the entire cabal is taken into Federal Court".

**CHARGE TWENTY- ONE (21)*: CONSPIRACY TO ATTEMPT MURDER
– FOUR (4) COUNTS**

[Paragraph 90] (CH21)*- **COUNT ONE:** Plaintiff, Mark Rohlman, charges defendant (4a) The Federal Bureau Of Investigation with conspiracy to attempt murder. *Plaintiff contends the offense was committed when defendant (4a) made repeated improper decisions to ignore the plaintiff's calls for help via the telephone and internet from January 28th thru February 1st 2008. Plaintiff attempted to get assistance seven times only to be ignored and then intimidated by defendant (4a). These improper decisions and actions by defendant (4a) damaged plaintiff severely*

[Paragraph 91] (CH21)*- **COUNT TWO:** Plaintiff, Mark Rohlman, charges defendant (1a-1) Santa Rosa County Florida Board of County Commissioners with conspiracy to attempt murder. Plaintiff asserts that the offense occurred on the morning of February 1, 2008 at 4:30 a.m. in Montgomery Alabama when defendant (1a-1c) Tub Goodin attempted to physically take plaintiff's evidence (tapes) and then kill plaintiff. Fortunately plaintiff woke up before defendant (1a-1c) Tub Goodin was able to get the jump on plaintiff. Plaintiff was sleeping in his car while on the run from the cabal. Plaintiff asserts that the cabal forced defendant (1a-3) Tub Goodin to "fix the problem he started before the entire cabal is taken into Federal Court".

[Paragraph 92] (CH21)*- **COUNT THREE:** Plaintiff, Mark Rohlman, charges defendant (5a) Clayton County Georgia Sheriff with conspiracy to attempt murder. *Plaintiff contends that on February 1, 2008 he called defendant (5a) for assistance and expressed a fear for his life and reported an attempt on his life the previous night. Defendant (5a) acted aggressively toward the plaintiff and then denied any and all assistance requested by plaintiff and put plaintiff back on the road to fend for himself at his greatest time of need of law enforcement protection and investigative powers. Plaintiff further contends that Equal Protection under Law means that if other citizens who call for help in similar situation mandate a report be generated by officer's proper normal procedure's then by definition plaintiff was not treated with Equal Protection under Law. If a citizen expresses a fear for their life and reports an attempt on their life there is a legal obligation by the officer to generate*

a report for possible further investigation by the officer involved and/or for use by plaintiff in a judicial proceeding. These incidents could only have occurred via collusion.

[Paragraph 93] (CH21)*- **COUNT FOUR:**Plaintiff, Mark Rohlman, charges defendant (5b) Gwinnett County Georgia Sheriff with conspiracy to commit murder. *Plaintiff contends that on February 1, 2008 he called defendant (5b) for assistance. Plaintiff reported an attempt on his life that morning (in detail) and expressed a fear for his life. Defendant (5b) acted aggressively toward plaintiff and then denied any and all assistance requested by the plaintiff and put the plaintiff back on the road to fend for himself at his greatest time of need of law enforcement protection and investigative powers. Plaintiff further contends that Equal Protection under Law means that if other citizens who call for help in a similar situation mandate a report be generated by the officer's proper normal procedure's then by definition the plaintiff was not treated with Equal Protection under the Law. . If a citizen expresses a fear for their life and reports an attempt on their life there is a legal obligation by the officer to generate a report for possible further investigation by the officer involved and/or for use by the plaintiff in a judicial proceeding.*

Plaintiff resides in his truck and is constantly on the move with no electronic signals (no phone, credit cards, debit cards, or internet), physical address and operating on cash. Plaintiff has been living under these conditions since January 28, 2008 as a direct result of the cabals multiple attempts to bully the plaintiff off the case. Plaintiff's legal documents are to be sent to the plaintiff's family at: 18981 NW 76th Avenue, Alachua FL 32615-7590. Plaintiff's family will then drop ship them to wherever the plaintiff is at the moment. The quickest communication route for contacting plaintiff is via e-mail: greenbacksolar@yahoo.com as the plaintiff can check e-mail at any public library or coffee shop anywhere in the country.

Defendants reside at:

DEFENDANT (1) State of Florida - resides at the Office of the Attorney General Florida, State of Florida The Capitol PL-01, Tallahassee, FL 31399-1050 Phone: 850-414-3300 fax: 850-488-4872

DEFENDANTS (1a-1) Santa Rosa Board of County Commissioners - resides at Administrative Center, 6495 Caroline Street, Suite M, Milton Fl 32570 phone 850-983-1877 fax:850-983-1856

DEFENDANTS: (1a-2) Santa Rosa County Planning and Zoning Department, phone:850-981-7075 fax:850-983-9874, **(1a-3)** Santa Rosa County Local Planning Board, phone:981-7075 fax:983-9874, **(1a-4)** Santa Rosa County Aviation Advisory Council, all reside at 6051 Old Bagdad Hwy, Milton FL 32583

DEFENDANT (1a-5) The Circuit Court of the 1ST Judicial Circuit of Florida resides at; Santa Rosa County Courthouse, 6865 Caroline Street, Milton FL 32570 phone:850-981-5540 fax:850-626-4268

DEFENDANT (1a-6) Santa Rosa County Florida Attorney resides at Administrative Center, 6495 Caroline Street, Suite C, Milton Fl 32570 phone 850-983-1857 fax:850-983-1856

DEFENDANT (1a) Santa Rosa County Court resides at Santa Rosa County Clerk of the Court, P.O. Box 472, Milton FL 32572

DEFENDANT (1a-7) Santa Rosa County Administrative Services Dept. resides at Administrative Center, 6495 Caroline Street, Suite M, Milton Fl 32570 phone 850-983-1877 fax:850-983-1856

DEFENDANT (2) Holley Navarre Water System, Inc. resides at 8574 Turkey Bluff Road, Navarre, FL 32566, ph:850-939-2427 fax:850-939-9541

DEFENDANT (3) Bay Pointe Homes Inc. resides at 1764 Sea Lark Lane, Navarre FL 32566 ph:850-939-2371 fax:850-939-3334 e-mail: bphnavfl@aol.com

DEFENDANT (4) The United States of America resides at The Office of the Attorney General of the United States of America, U.S. Department of Justice, 950 Pennsylvania Avenue NW, Washington DC 20530-0001 ph:202-514-2000 fax:AskDOJ@usdoj.gov ph:202-514-2000

DEFENDANT (4a) The U.S. Department of Justice resides at The Office of the Attorney General of the United States of America, U.S. Department of Justice, 950 Pennsylvania Avenue NW, Washington DC 20530-0001 ph:202-514-2000 fax:AskDOJ@usdoj.gov ph:202-514-2000

DEFENDANT (4a) The Federal Bureau Of Investigation Headquarters resides at FBI Headquarters, J. Edgar Hoover Building, 935 Pennsylvania Avenue NW, Washington DC, 20535-0001 phone:

DEFENDANT (4a-1) The Federal Bureau Of Investigation Pensacola resides at FBI Pensacola, 1 Pensacola Plaza, Pensacola FL 32501 ph:850-432-3476

DEFENDANT (4a-2) The Federal Bureau Of Investigation Jacksonville Fl resides at FBI Jacksonville, suite 200, 7820 Arlington Expressway, Jacksonville FL 32211-7499 ph:904-721-1211

DEFENDANT (4b) United States Department of Defense resides at The Office of the Attorney General of the United States of America, U.S. Department of Justice, 950 Pennsylvania Avenue NW, Washington DC 20530-0001 ph:202-514-2000 fax:AskDOJ@usdoj.gov ph:202-514-2000

DEFENDANT (4b-1) Homeland Security Department resides at The Office of the Attorney General of the United States of America, U.S. Department of Justice, 950 Pennsylvania Avenue NW, Washington DC 20530-0001 ph:202-514-2000 fax:AskDOJ@usdoj.gov ph:202-514-2000

DEFENDANT (4b-2) U.S. Navy resides at The Office of the Attorney General of the United States of America, U.S. Department of Justice, 950 Pennsylvania Avenue NW, Washington DC 20530-0001 ph:202-514-2000 fax:AskDOJ@usdoj.gov ph:202-514-2000 U.S.Navy

DEFENDANT (5) The State of Georgia resides at Office of the Attorney General, 40 Capital Square SW, Atlanta GA ph:404-656-3300 fax:404-657-8733

DEFENDANT (5a) Clayton County Georgia Sheriff resides at 9157 Tara Blvd., Jonesboro, GA 30236 ph:770-471-1122 fax:770-479-5358

DEFENDANT (5b) Gwinnett County Georgia Sheriff resides at 2900 University Pkwy. NE, Lawrenceville GA 30043 ph: 770-619-6500 e-mail:butch.conway@gwinnettcounty.com

DEFENDANT (6) The Florida Bar Association resides at 651 E. Jefferson Street, Tallahassee, FL 32399-230 ph:850-561-5600 fax:850-561-5827

DEFENDANT (7) State of New Mexico resides at Office of the Attorney General, 408 Galsteo Street, Villagra Building, Santa Fe NM 87501. phone:505-827-6000 fax:05-827-5826

DEFENDANT (7a) New Mexico State Parks Division, Energy, Minerals & Natural Resources Department and Elephant Butte Lake State Park reside at P.O. Box 13, Elephant Butte, NM 87935 phone:505-744-5421

On January 25, 2007 plaintiff appeared before defendant **(1a-1)** during a regularly scheduled rezoning meeting. Plaintiff paid all the necessary fees and filed all the documents required by the State Of Florida and Santa Rosa County to apply for a "Small Scale Re-zone" from Residential (R-1) zoning to Highway Commercial Development (HCD)) zoning on the piece of property located at 7580 East Bay Boulevard, Navarre FL 32566. Santa Rosa County parcel ID# 12-2S-27-0000-01319-0000. Plaintiff is a U.S. citizen that lived in Santa Rosa County, Florida from 1989 - 2008. Plaintiff purchased discussed property in 2001 with the intention of rezoning it to Highway Commercial District (HCD) zoning in order to build a solar powered health food store that served solar cooked foods w/drive thru window service. Discussed property is located on a county highway, (CR-399), which has a posted 45 mph speed limit. The average car traveling on this section of CR -399 is going 50-55 mph and this section of CR-399 is scheduled to be a four-lane highway in the future. Plaintiff's property lies in the midst of predominantly HCD zoning, Industrial zoning, restricted residential zoning and woods. *Plaintiff claims that contrary to the overwhelming facts/evidence supporting and favoring a HCD re-zoning decision, the defendant made a decision that was unpredictable and lacked a rational basis. Plaintiff's request for HCD zoning was arbitrarily and capriciously denied by a clear error in judgment by defendant (1a).* Plaintiff settled for Neighborhood Commercial (NC)

zoning under duress of complete denial of his re-zone application by defendant (1a). It is at this juncture that the plaintiff realized that a cabal is firmly in place in Santa Rosa County and that it had repeatedly violated the Plaintiff's Civil Rights.

Plaintiff's request for HCD zoning is not asking for anything that has not been given to other Citizens of Santa Rosa County. Public records show there have been four (4) requests exactly like the Plaintiff's request that have been approved by defendant (1a). Three out of the four approved requests sit on the same half mile of Highway 399 as that of the Plaintiff's property. One of the R1 to HCD re-zone requests was approved two years prior and another R-1 to HCD approval on this same highway was recently approved in March of 2008 (since denying the plaintiff in January of 2007)).

In November, 2004, plaintiff attended the defendant (1a) Santa Rosa County Florida Board of County Commissioners' zoning meeting that approved a "small scale re-zone" request for R-1 to HCD for the Martin Reilly/Don Plank's property where the defendant (1a) approved HCD zoning on three (3) R-1 zoned lots (one (1) R-1 zoned lot not even abutting Highway 399 (parcel 12-2s-0000-01606-0000-2801). Plaintiff attended this and other meetings in order to learn the process and procedure for his upcoming application. Plaintiff researched the other two other R-1 to HCD approvals within one-half mile of his property before purchasing discussed property. All four of these approved re-zone requests from R1 to HCD took place during the time the Plaintiff was actively investigating commercial property for purchase or since Plaintiff has owned the discussed property. Three of the R-1 to HCD re-zoning approvals by defendant (1a) are within sight distance from discussed property. Plaintiff's parcel is now the **"ONE AND ONLY" (definition of capricious) piece of NC zoned** property among **"over 100 HCD zoned"** lots on the entire highway. Plaintiff asks the court to apply the "substantial evidence" test to defendant (1a)'s adjudication on January 25th, 2007 in regards to Plaintiff's original request for HCD zoning.

Plaintiff will prove that:

- 1) That defendant (1a)'s procedures reduced the Plaintiff's Right of Due Process of a "five member board voting process" to that of a "one man referendum".
- 2) The defendant's decision is arbitrary and capricious and should be overturned if the underlying rationale or factual assertions are deemed unreasonable. The inconsistent application of zoning

ordinances is remedied in the Administrative Procedure Act. Section 706 (2) (A) “instructs courts reviewing regulation to invalidate any agency action found to be capricious and arbitrary, an abuse of discretion or otherwise not in accordance with the law”.

Plaintiff is entitled to injunctive and declaratory relief from the defendants under the above facts on the basis of the effect of the defendant’s “illegal” procedures and “arbitrary and capricious” official decisions. The defendant’s acts have taken away the Plaintiff’s right to a fair administrative procedure. The defendant’s act of arbitrarily and capriciously imposing the limitations of NC zoning on the Plaintiff’s property have put unfair and over-restrictive governmental control over the property. Defendant (1a) abridged the Plaintiff’s “privileges” and/or “right to liberty” under the 14th Amendment. This illegal act by the defendant has damaged the Plaintiff’s property value (property damages) and unlawfully restricted the property use. Plaintiff has been illegally deprived of a fair administrative hearing from defendant (1a). Plaintiff has been grievously harmed.

Plaintiff motions THE UNITED STATES FEDERAL COURT, FLORIDA NORTHERN DISTRICT, ELEVENTH CIRCUIT to send a notice to all the defendants demanding they call off the Bullies that have attempted to intimidate and scare the Plaintiff off the case and/or physically prevent the Plaintiff from having his day in court. Two (2) attempts to prevent the Plaintiff from pursuing this case have failed and the phone calls and hang-ups are not intimidating. The first physical attempt occurred when the Plaintiff was on his way to FBI headquarters in Atlanta Georgia.. Defendant (1a-1c) Tub Goodin is the person that started this mess. At 4:30a.m.on January 31, 2008 in a parking lot in Montgomery Alabama defendant (1a-1c) Tub Goodin attempted to physically take the Plaintiff’s evidence (tapes) and frighten the Plaintiff away or kill the Plaintiff (Headline "Tourist robbed - no evidence"). Fortunately for the Plaintiff, he woke up before defendant Tub Goodin was able to get the jump on him. Plaintiff was sleeping in his car while on the run from the cabal. Fortunately for defendant (1a-1c) Tub Goodin, the plaintiff did not awaken ten (10) seconds sooner and that defendant (1a-1c) Tub Goodin ran away or he might have met his demise that night. The defendant’s second attempt to physically prevent the plaintiff from having his day in court occurred while the plaintiff was on his way to California and once again on the run from the cabal. In New Mexico the Plaintiff was forced thru a Homeland Security checkpoint on Interstate highway ? in middle America. When the plaintiff stopped for gas shortly thereafter a stooge bully walked up to the

plaintiff in the parking lot and after 15 minutes of conversation that hit all the plaintiff's hot buttons (environmentalist) the stooge bully convinced the plaintiff to go to Lion's Beach where someone drained the oil from the plaintiff's truck motor in the middle of the night. The plaintiff is fully prepared and capable of protecting himself from the bullies at all times and is not going to take another attempt lying down. Plaintiff is very concerned that the defendant's repeated attempts to settle this case in the middle of the night on the street will force the Plaintiff to injure or kill someone in self-defense. The defendants should also be aware that the plaintiff has five (5) aggressive, astute brothers who are very well informed on the details of this case and in possession of multiple copies of the legal documents and evidence. The Plaintiff's family is not only extremely concerned about the ill treatment heaped upon their brother up till now by the defendants but also looking forward to the justice and the payment of damages to come. They are fully prepared and able to carry on this case in the event the Plaintiff dies in a "robbery with no evidence" or "an accident", as the damages will be paid to the estate of the now dead Plaintiff. The defendants should also be aware of the publicity about to be generated by this case as the Plaintiff has been in conversation with and forwarded copies of the evidence and legal documents to the New York Times, The Washington Post, The Wall Street Journal, multiple United States Senators.

Plaintiff, Mark Rohlman, demands a jury trial in Tallahassee Florida instead of Pensacola, Florida for the above-entitled action. Plaintiff is demanding the trial be held in Tallahassee for many reasons. Plaintiff asserts that due to the nature of the defendant's (power hungry, greedy, politically connected, ruthless bullies) and the extensive number of deeply connected generations of defendants along with the families, friends, political cronies, families of political cronies etc.) makes 1) finding an objective jury in the Pensacola area a difficult and an unnecessary high burden for the plaintiff to overcome and an advantage to the defendants when it comes to jury selection, 2) The plaintiff's concern for his physical security is a legitimate concern because the trial could last for months and the plaintiff feels physically at risk in Escambia County because it is too close to the cabal that is trying to protect its interests at any cost. This civil case will surely at some point lead to criminal charges. Many of the defendants hold powerful government positions and may not only lose their careers but these same well-known upstanding citizens (wolves in sheep clothing) may end up with long prison

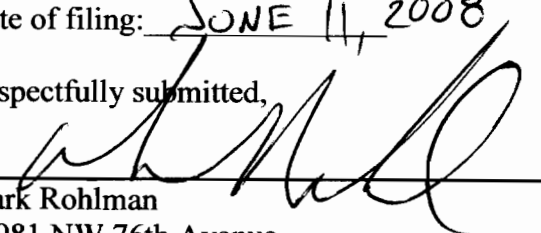
sentences. The defendant's history of bullying in this case demands that the Plaintiff's security be a top priority of THE UNITED STATES FEDERAL COURT, FLORIDA NORTHERN DISTRICT, ELEVENTH CIRCUIT. 3) Plaintiff feels that Pensacola's close physical proximity and the subsequent friendships and political connections that always come from close proximity will work behind the scenes at the political (secret) level and may affect the trial. In the event the Plaintiff's demand on THE UNITED STATES FEDERAL COURT, FLORIDA NORTHERN DISTRICT, ELEVENTH CIRCUIT to have trial in Tallahassee rather than Pensacola is denied, the Plaintiff will be forced to appeal the case on this issue before the trial starts.

Plaintiff contends this is an open and shut case in which every defendant should attempt to reach settlement with the Plaintiff in order to prevent the embarrassment of and tax-payer funded cost of a federal trial when it is obvious to any objective layman that the plaintiff is right and the defendants are wrong in each and every count. Plaintiff contends that he made every possible attempt to settle these disputes amicably but at every step along the way the defendants denied simple fairness to the Plaintiff as well as the Constitutional Rights of the Plaintiff.

Plaintiff will allow each defendant fourteen (14) business days from the date of service of Notice to allow time to review the options available and make contact with plaintiff in an effort to start a movement toward settlement and closure under the following terms. Plaintiff will settle with any defendant that makes contact within fourteen (14) business days from date of service of notice for thirty-five percent (35%) of damages. After the above mentioned fourteen (14) day limit, plaintiff's settlement amount goes to sixty percent (60%) of damages and once the jury goes into deliberation the settlement amount is eighty-five percent (85%) of damages. This settlement schedule applies to each and every named defendant and is non-negotiable.

Date of filing: JUNE 11, 2008

Respectfully submitted,



Mark Rohlman
18981 NW 76th Avenue
Alachua FL 32615-7590
850-496-6120