

Wasserberg vs you tube legal motion to amend Wasserberg v. United States et al. - Amended
Complaint with Motion to Amend

U.S. District Court for the District of Arizona

800 N. Cherry Ave., Tucson, AZ 85701

Case Title: Tommie Jayne Wasserberg dba Real Things Artisans Cooperative v. United States, National Security Agency (NSA), Central Intelligence Agency (CIA), Defense

Intelligence Agency (DIA), Federal Bureau of Investigation (FBI), National Institute of Mental Health (NIMH), Adalid Zethon Claire Jr., Col. Tom Medar (USAF), Thomas Butler (NIMH),

City of South Tucson, 911 Emergency Services, South Tucson Police Department (STPD),

Jason Winsky (TPD-MHST), Kerry Witherspoon (Tucson FBI), El Rio Community Health

Center (BH Dept.), Sonora Behavioral Health Hospital, Dr. X, COPE Behavioral Services,

Community Bridges, Inc., Sasha Robert Cohen, AMB Holdings (Marcelo Claire, Kevin

Hoffman, Michael Medara), Another Message Board (AMB), Total Choice Hosting, Kiwi Farms

(Joshua Connor Moon/LOLCOW, LLC), Sneasel, Lurker Xavier, YouTube Legal, Unofficial

Rainbow Family of Living Light (curated by Cornell, Garrick Beck), Rob Savoye

(welcomehome.org), Gary Stubbs (dba Rainbow Crystal Kitchen), and John Does 1-10

Case No.: [Existing case number from Wasserberg v. YouTube Legal]

Plaintiff:

Tommie Jayne Wasserberg

dba Real Things Artisans Cooperative

2607 S. 7th Ave., South Tucson, Pima, AZ 85713

Motion to Amend Complaint and Amended Complaint in Response to Order to Show Cause
Motion to Amend

Plaintiff Tommie Jayne Wasserberg, proceeding pro se, moves to amend the existing
Complaint in Wasserberg v. YouTube Legal under FRCP 15(a)(2) to include additional
defendants and claims, in response to the Court's order to show cause dated [assumed date
prior to May 20, 2025].

1. This amendment consolidates claims from Wasserberg v. Juarez (Pima County Superior Court Case No. C20252977) and Wasserberg v. Cohen/Cohen v. Wasserberg (Pima County Superior Court Case No. [Unknown]), which are the subject of a pending Motion to Consolidate and Change Venue in Pima County Superior Court.
2. The amendment adds federal and local government defendants, as well as private entities, involved in a 40-year conspiracy targeting Plaintiff, and includes a potential class action for thousands of targeted individuals.
3. Amendment is in the interest of justice, as it addresses the full scope of the conspiracy and ensures all related claims are adjudicated in one forum.

Amended Complaint: Institutionalized Discrimination and Politically Motivated, Gender-Based Targeted Harassment of an LGBTQ+ Identified Dissident Content Creator by Federal Agencies, Local Governments, and Private Entities in Violation of RICO and Civil Rights Laws
Procedural History

1. Plaintiff filed Wasserberg v. Juarez in Pima County Superior Court (Case No. C20252977), alleging misconduct by local officials related to unlawful detentions, false reporting, and systemic discrimination.

2. Plaintiff filed Wasserberg v. Cohen and responded to Cohen v. Wasserberg in Pima County Superior Court (Case No. [Unknown]), alleging defamation per se, harassment, and RICO violations by Cohen and related actors (e.g., AMB Holdings, Kiwi Farms).
3. Plaintiff has moved to consolidate these cases and change venue to this Court, with the motion pending in Pima County Superior Court.
4. This Amended Complaint responds to the Court's order to show cause, expanding the scope of Wasserberg v. YouTube Legal to include all defendants and claims.

Jurisdiction and Venue

1. This Court has jurisdiction under 28 U.S.C. § 1331 (federal question: RICO, 18 U.S.C. § 1964(c); civil rights, 42 U.S.C. § 1983) and 28 U.S.C. § 1332 (diversity for some defendants).
2. Venue is proper in Tucson, where Plaintiff resides and many events occurred, pending the change of venue from Pima County Superior Court.

Parties

1. Plaintiff is a Jewish intersex gender queer human rights activist operating Real Things Artisans Cooperative (trademark registered in Arizona).
2. Defendants include federal agencies (U.S., NSA, CIA, DIA, FBI, NIMH), Claire (CIA asset, Florida), Medar (USAF), Butler (NIMH), City of South Tucson (represented by Pierce Coleman PLLC), 911, STPD, Winsky (TPD-MHST), Witherspoon (Tucson FBI), El Rio Community Health Center (BH Dept.), Sonora Behavioral Health Hospital, Dr. X, COPE, Community Bridges, Cohen, AMB Holdings, AMB (hosted by Total Choice Hosting), Kiwi Farms (Joshua Moon/LOLCOW, LLC, represented by Matthew Daniel Hardin), Sneasel, Lurker Xavier, YouTube Legal, Unofficial Rainbow Family of Living Light, Savoye (welcomehome.org), Stubbs (Rainbow Crystal Kitchen), and John Does 1-10.

Statement of Facts

1. Plaintiff alleges a 40-year conspiracy (1985–2025) of institutionalized discrimination and targeted harassment as a Jewish intersex gender queer dissident content creator, rooted in their high IQ (>150), knowledge harmful to the war-based economy, and peace activism since 1963.
2. Online harassment since 1999 (26 years), with a specific campaign by AMB since 2011 (14 years), includes defamation per se falsely branding Plaintiff as a pedophile, statutory rapist, and dogfucker, causing 30 psychiatric episodes, 100+ misdemeanors, and \$100,000 in lost business (2019 Gem & Lapidary show ban).
3. Cohen initiated contact on Threads, followed Plaintiff to Facebook, contacted Plaintiff's friends to spread defamatory claims, and escalated harassment by posting on Kiwi Farms, AMB, and the kjhoffman1969 Facebook page, motivated by Plaintiff's anti-Israel activism.

Causes of Action

1. RICO Violations (18 U.S.C. § 1962) against all Defendants for a racketeering enterprise.
2. Civil Rights Violations (42 U.S.C. § 1983, § 1985) against government Defendants.

3. Defamation Per Se and IIED against Cohen, AMB Holdings, and Kiwi Farms.

Prayer for Relief

Plaintiff requests treble damages under RICO, compensatory and punitive damages, injunctive relief, and class certification.

Declaration

I, Tommie Jayne Wasserberg, declare under penalty of perjury that the foregoing is true and correct.

Dated: May 20, 2025

/s/ Tommie Jayne Wasserberg

Certificate of Service

On May 20, 2025, this Amended Complaint was served via first-class mail to all parties, including Pierce Coleman PLLC and Matthew Daniel Hardin.

/s/ Tommie Jayne Wasserberg

Tommie Jayne Wasserberg
5/20/2025