

punitive damages, based on The Coca-Cola Company's (herein "COCA-COLA") continuing deprivation of rights under the laws of the State of Georgia resulting from acts of officers, supervisors and/or managers of COCA-COLA that constitute the following causes of action: (1) racially hostile work environment; (2) negligent supervision; (3) negligent hiring and retention; (4) negligent infliction of emotional harm; (5) intentional infliction of emotional harm; (6) retaliation; (7) disparate treatment because of race and sex; (8) disparate impact affecting African Americans; (9) Slander and Defamation of Character; (10) Discrimination in violation of Section 1981 of the Civil Rights Act of 1871, as amended by the Civil Rights Action of 1991, 42 U.S.C. § 1981 ("Section 1981"), (11) Discrimination in violation of Title VII of the Civil Rights Act of 1964, as amended by the Civil Rights Act of 1991, 42 U.S.C. § 2000 et seq. ("Title VII").

June 14, 2000 Plaintiff Marietta Goodman retained the law firms of Gary, Williams, Parenti, Finney, Lewis, McManus, Watson & Sperando (herein as "Defendants") of Stuart, Florida and Cochran, Cherry, Givens, Smith & Sistrunk, P.C. of Atlanta, Georgia and Christopher D. Langley, P.C. of Norcross, Georgia to represent her in her individual interests against COCA-COLA.

March 19, 2001 Plaintiff Sharron Mangum retained the law firm of Gary, Williams, Parenti, Finney, Lewis, McManus, Watson & Sperando (herein as "Defendants") of Stuart, Florida to represent her in her individual interests against COCA-COLA.

During the course of Goodman and Mangum's litigation, and specifically from 2001 to present, Plaintiffs asserted that the Defendants were not acting in their best interests. They alleged that the Defendants in the above styled case, Civil Action File No. 1:03-CV-3387 (RWS), conspired with COCA-COLA to implement a fraudulent scheme to induce them and others to settle all their claims for less than they would have otherwise. The alleged scheme consisted of fraud in withholding from discovery, material scientific data and information and giving false testimony in other cases. Plaintiffs Goodman and Mangum brought this action on behalf of themselves and the class of all others similarly situated, pursuant to Rule 23 of the Federal Rules of Civil Procedure. The claims for relief asserted in the above styled case are based on violations of the Racketeering Influenced and Corrupt Organizations Act ("RICO"), 18 U.S.C. § 1961, et seq.

By July 2003, Plaintiffs Goodman and Mangum's legal counsel, the Defendants terminated their representative amid allegations of fraud and racketeering in a complaint submitted

to the Florida Bar Association (Hereto attached as Exhibit A).
Plaintiffs in Propria Persona filed this action against the
Defendants on November 7, 2003.
This case is currently pending before this Court.

Request to Charge

1. Pursuant to L.R. 30.1 of the Federal Criminal Procedure,
Plaintiffs Goodman and Mangum, appearing Propria Persona, hereby
Request to Charge the Defendants, WILLIE E. GARY, TRICIA P.
HOFFLER, F. SHIELDS MCMANUS, MARY ANN DIAZ, JEROME STONE, THE
LAW FIRM OF GARY, WILLIAMS, PARENTI, FINNEY, LEWIS, MCMANUS,
WATSON, AND SPERANDO, P.C., and MAJOR BROADCAST CABLE for
criminal actions arising in this civil action.

2. Plaintiffs Goodman and Mangum demand maximum prison term
on each count in the general population for individuals found
guilty and maximum fines imposed for each individual,
corporation and entity including an oversight committee.

3. Plaintiffs Goodman and Mangum reserve the right to amend
this indictment at any time.

II. PARTIES

A. The Plaintiff

4. Plaintiff, MARIETTA GOODMAN, is an African-American
adult citizen who resides in Atlanta, Georgia, and is a former
salaried employee of COCA-COLA.

5. At all times relevant to this lawsuit, Plaintiff Marietta Goodman was, until April 1999, employed by Defendant The Coca-Cola Company most recently as an Administrative Assistant, until being criminally and maliciously bullied into resigning.

6. At all relevant times, Plaintiff Marietta Goodman worked for Defendant Coca-Cola in Atlanta, Fulton County, Georgia. She spent approximately 4 years employed by the Defendant Coca-Cola.

7. Plaintiff, SHARRON MANGUM, is an African-American adult citizen who resides in Atlanta, Georgia, and is a former salaried employee of COCA-COLA.

8. At all times relevant to this lawsuit, Plaintiff Sharron Mangum was, until March 15, 2003, employed by Defendant The Coca-Cola Company most recently as a Human Resources Training Coordinator, until being criminally and maliciously fired.

9. At all relevant times, Plaintiff Sharron Mangum worked for Defendant Coca-Cola in Atlanta, Fulton County, Georgia. She spent 9.1 years employed by the Defendant Coca-Cola.

B. The Defendants

10. Upon information and belief, Defendant, Willie E. Gary, is a citizen of the state of Florida and is an attorney

who at all times relevant herein was practicing his profession through the law firm of Defendant, Gary, Williams, Parenti, Finney, Lewis, McManus, Watson & Sperando, P.C. (herein "The Gary Firm"), with a principal place of business in Stuart, Florida. Arrest warrant must be served through The Gary Firm at 221 East Osceola Street, Stuart, Florida 34994.

11. Upon information and belief, Defendant, Tricia P. Hoffler, is a citizen of the State of Florida and is an attorney who at all times relevant herein was practicing her profession through the law firm of Defendant, Gary, Williams, Parenti, Finney, Lewis, McManus, Watson & Sperando, P.C., with a principal place of business in Stuart, Florida. Arrest warrant must be served through The Gary Firm at 221 East Osceola Street, Stuart, Florida 34994.

12. Upon information and belief, Defendant, F. Shields McManus, is a citizen of the State of Florida and is an attorney who at all times relevant herein was practicing his profession through the law firm of Defendant, Gary, Williams, Parenti, Finney, Lewis, McManus, Watson & Sperando, P.C., with a principal place of business in Stuart, Florida. Arrest warrant must be served through The Gary Firm at 221 East Osceola Street, Stuart, Florida 34994.

13. Upon information and belief, Defendant, Mary Ann Diaz, is a citizen of the State of Florida and is an attorney who at all times relevant herein was practicing his profession through the law firm of Defendant, Gary, Williams, Parenti, Finney, Lewis, McManus, Watson & Sperando, P.C., with a principal place of business in Stuart, Florida. Arrest warrant must be served through The Gary Firm at 221 East Osceola Street, Stuart, Florida 34994.

14. Upon information and belief, Defendant, Jerome Stone, is a citizen of the State of Florida and is an attorney who at all times relevant herein was practicing his profession through the law firm of Defendant, Gary, Williams, Parenti, Finney, Lewis, McManus, Watson & Sperando, P.C., with a principal place of business in Stuart, Florida. Arrest warrant must be served through The Gary Firm at 221 East Osceola Street, Stuart, Florida 34994.

15. Upon information and belief, Defendant, Gary, Williams, Parenti, Finney, Lewis, McManus, Watson & Sperando, P.C., is a professional corporation incorporated under the laws of the State of Florida, with a principal place of business in the City of Stuart and at all times material to this indictment represented Plaintiffs Goodman and Mangum from March 2000 to

July 2003, and is also responsible for the criminal actions of its employees, counsels, legal representatives and/or agents.

16. Upon information and belief, Defendant, Major Broadcast Cable is a professional corporation incorporated under the laws of the State of Georgia, with a principal place of business in the City of Atlanta. At all times material herein, Willie E. Gary is a principal owner of Major Broadcast Cable and, as a practical matter, is controlled by Defendant Willie E. Gary.

III. VENUE

A. PLACE OF PROSECUTION AND TRIAL

17. Pursuant to L.R. 18 of Federal Rules of Criminal Procedure, venue is proper in this Court in that the criminal actions were committed against the United States Northern District Court. Venue is also proper under 18 U.S.C. § 1965(a) and (b) in that the DEFENDANTS reside in, are found, have an agent or transact their affairs in this district or the ends of justice require that DEFENDANTS be brought before this Court.

STATEMENT OF FACTS

Summary: The Defendants Racketeering Enterprise

18. The Defendants criminally colluded to and with malignancy used lies and extortionate intimidation, fear, coercion and bribery to ruin Plaintiffs', Goodman and Mangum's

career, destroy their professional reputation, eliminate any ability for them to earn an income, and punish them and their families emotionally and psychologically Ð all as part of the Defendants continued operation of The Gary Firm and its entities as a criminal enterprise through a pattern of racketeering activity.

IV. ALLEGATIONS OF PLAINTIFF

19. Approximately April 2000 Gregory Allen Clark requested the presence of over 100 class action members to be introduced to The Gary Firm at the Dekalb County Public Library on Church Street in Atlanta, Georgia. Mr. Gary and fifteen members of his firm marched into the Dekalb County Public Library uniformly like a scene from the movie on Malcom X. Mr. Gary, dramatically proclaimed that, "We gon sue the draws off Coke!" He held up the agreement that lead plaintiffs signed with Cyrus Mehri and referred to it as a, "slave contract." He asserted that, "The amount of money Cyrus is suing for is peanuts!"

20. May 2000, the Defendants implemented a scheme designed to compel The Coca-Cola Company to resolve the pending lawsuits on terms extremely advantageous to the Defendants, including instructing Gregory Allen Clark, a former lead plaintiff in the class action lawsuit, to secure other plaintiffs who were

similarly situated to him with respect to claims against The Coca-Cola Company as to enhance Defendants pool of claimants.

21. Upon information and belief, at Defendants urging, Gregory Allen Clark, thereafter assisted Defendants in securing attorney/client representation agreements with 16 additional individuals (which included Plaintiffs Marietta Goodman and Sharron Mangum) to pursue their individual claims against The Coca-Cola Company.

22. May 2000 in an article in the Miami Daily Business Review, Mr. Gary "insists there's nothing wrong with his owning a cable TV network that signed an advertising contract with Coca-Cola . . . on the eve of a court-ordered mediation after putting the MBC Network-Coke deal to bed." Mr. Gary further states, ". . . the clients consented" and "they were fully informed" of the Coke negotiations and deal before he took their cases (Hereto attached as Exhibit B).

23. Goodman and Mangum as well as The Gary Firm's other clients, were not advised of all the facts, risks and complications in this apparent conflict of interest. Neither were they informed in writing or otherwise, nor did they give consent in writing according to the American Bar Association "Ethics 2000" and Florida Bar "Model Rules of Professional Conduct."

24. June 2000 in an article in The Atlanta Journal-Constitution, Cyrus Mehri (lead attorney for the class) alleges that, "Gary has a "glaring conflict of interest that prevents him from representing the class." There can be no doubt that Mr. Gary's business dealings with Coca-Cola constitute a conflict of interest in any action he purports to prosecute against the company, Mehri contended in a motion. In the motion, Mehri's team accused Gary's firm of actually helping Coca-Cola by soliciting individual class members. That is allegedly because Coke stands a better chance of defeating individual claims than one involving an entire class of employees, the motion said. Indeed, the desire to pick off employees' claims one by one is the ream employers oppose class certification, the motion said."

25. October 2001 Willie E. Gary ("Gary") informed the clients during a meeting held at the Stuart, FL office that, "The things that scare them [defendant] are incidents of racial slurs, failure to act," and "things that you saw done to someone else." Gary further instructed clients to exaggerate the truth or lie, because "Coke will coach them [witnesses] to lie on you."

26. January 17, 2002 Elizabeth Finn Johnson had a discussion with F. Shields McManus and subsequently submitted a

letter (Hereto attached as Exhibit C) addressed to Mr. Gary, F. Shields McManus, and Tricia P. Hoffler acknowledging, "that their client Coca-Cola had been given the opportunity to review the settlement demand presented in a meeting between the above parties on December 3, 2001." Elizabeth states, "I write to confirm that conversation." She further acknowledges, "The possibility of settling these cases, and agree that resolution of these cases without further litigation is in the interest of all of our clients" based on a meeting in Atlanta December 2001.

27. From 2001 to 2002 Gary denied that any such meeting was held, and further stated that there were no settlement discussions with Coca-Cola.

28. During this same period clients were instructed by Gary and other members of The Gary Firm to steal confidential documents, and on March 23, 2002 in a secretly recorded conference call with their clients, F. Shields McManus is heard telling eleven (11) of their seventeen (17) Coca-Cola clients, "...Meanwhile, ahh thanks to Tinlyn Graham, I think we got the Ware Report (Hereto attached as Exhibit D).

29. In this same recording, F. Shields McManus instructs the Coca-Cola clients, "...You know we've been requesting all of you to send documents and if you have any other documents you haven't sent us even if you think they're insignificant, we need

to look at 'em and if they're too voluminous to have you send them then we need to come visit with you anyway. But, ahh, that's what we've been doing recently on all your cases. And, Tinlyn, among the documents she had, was a report to Douglas Ivester updated Carl Ware and several other persons ... ahh all... African Americans, ahh he would probably know, but that I think is what they talk about when they say the "Ware Report, because it talks about problems with the diversity program not being pushed and, and in fact there is a lot of, of inequality and, and discrimination going on at Coke."

30. September 2002 The Gary Firm contacted all seventeen of their clients to inform them that they had "frivolous claims." In fact, four of the seventeen clients contacted were former lead plaintiffs from the reported \$192.5 million dollar discrimination settlement--Motisola Abdalla, Ajibola Laosebikan, Gregory Clark and Wanda Williams. If these four had remained class action members would have settled with Coke for \$300, 000.

31. Client depositions were grossly neglected and clients were inadequately prepared for interrogation by Coca-Cola attorneys. In addition, the Gary Firm did not object to Coca-Cola's attorneys badgering clients about their personal lives, which had no bearing on the material facts in their allegations of discrimination. In fact, Goodman was deposed for 4 hours

about her personal life and Dana Allen was deposed 6 hours about her personal life. In both instances, less than 1 hour each was spent on their discrimination complaints.

32. Months later and without the knowledge and consent of Plaintiffs, upon information and belief, The Coca-Cola Company and Defendants secretly entered into an agreement through Major Broadcast Cable whereby Defendants would receive \$40 million dollars as part of a settlement package in exchange for Plaintiffs permanently dropping their claims against The Coca-Cola Company, and Defendants agreeing never to pursue litigation against The Coca-Cola Company again in the future. PLAINTIFFS were not to ever know about this scam, and in fact did not, receive any of these monies.

33. Plaintiffs were never told of this secret agreement, nor were they told of the \$40 million dollars Defendants were to, and upon information and belief did, receive.

34. September 2002, in furtherance of this fraudulent scheme, Defendants informed Plaintiffs that they did not have causes of action against The Coca-Cola Company, that they could never prevail against The Coca-Cola Company and that The Coca-Cola Company "would only offer what they would have gotten had they opted into the class-action discrimination settlement [Case No. 98-CV-3679], with Plaintiffs' potential claims. Defendants

insisted that Plaintiffs permanently dismiss their claims against The Coca-Cola Company without receiving any compensation.

35. Based strictly upon this intentionally false and erroneous advice, and the non-disclosure of the sums Defendants were to receive, thirteen of the seventeen Defendants clients signed various documents that purported to permanently dismiss and release their claims against The Coca-Cola Company.

36. The thirteen clients of the Defendants did not know about the \$40 million dollars at the time they signed documents to permanently dismiss and release their claims against The Coca-Cola Company.

37. Neither Plaintiffs' Marietta Goodman and Sharron Mangum nor the other Defendants' clients ever receive any of the \$40 million dollars.

38. Even if Defendants explanation were in fact true, which Plaintiffs' believes it is not, Defendants violated the Georgia Rules of Professional Conduct by entering into a blatant conflict of interest arrangement with The Coca-Cola Company for their own pecuniary advantage.

39. The Defendants and their co-conspirators, The Coca-Cola Company, conspired to commit and did commit mail and wire

fraud, and money laundering in furtherance of their scheme to cheat and defraud Plaintiffs.

40. The Defendants and their co-conspirators, The Coca-Cola Company, conspired to, did use, and continue to use extortion, including threats, intimidation, and fear, against PLAINTIFFS in furtherance of their illegal racketeering activities.

41. The Defendants and their co-conspirators The Coca-Cola Company conspired to obstruct, did obstruct, and continue to obstruct justice to conceal and cover-up the illegal racketeering activities to corruptly influence and threaten potential witnesses, to conceal the availability of information about such illegal activities from official proceedings, and to hinder and prevent the communication to law enforcement of information relating to the commission of these offenses.

42. Upon information and belief, the \$40 million dollars were monies The Coca-Cola Company were willing to pay to resolve Plaintiffs', and others' claims.

43. October 2003 Goodman discovered correspondence dated September 5, 2002 (Attached hereto as Exhibit E) addressed to Michael Johnston of King & Spalding and Elizabeth Finn Johnson of The Coca-Cola Company (both attorneys for Coca-Cola) from F. Shields McManus of The Gary Firm. In his letter to Mr. Johnston

and Ms. Johnson, Mr. McManus acknowledges that the Coca-Cola provided discovery evidence in which several Caucasian females similarly situated as Ms. Goodman made substantially higher salaries. Mr. McManus further states that, "In light of this new evidence, and after consultation with my client [Goodman], we have to decided to voluntarily withdraw her claims for damages based on Discrimination in Compensation and Promotion (Amended Complaint paragraph 20-24 and 44, (1) and (2) only), and also Disparate Impact in Evaluation and promotion (Count 3), and Disparate Impact in Promotion in Hiring Policy (Count 12). Accordingly, I will prepare a stipulation of partial voluntary dismissal (with prejudice) to which you have advised you will agree. I expect to have this drafted and faxed to you by tomorrow."

44. Goodman had no knowledge of said discovery evidence, nor did she have knowledge of said communication with Coca-Cola's counsel nor The Gary Firm's contractual obligation to Coca-Cola as evident by correspondence dated July 15, 2004 (Attached hereto as Exhibit F) from Ken Winkler of Elarbee, Thompson, Sapp & Wilson, The Gary Firm's counsel in Goodman and Mangum, et al. vs. Gary et al., Civil Action File No. 1:03-CV-3387-RWS.

THE SCAM

Civil Rights Activists Exploit Clients for Billions

45. Early as 2000 a corrupt organization of individuals began traveling across the country extorting hundreds of millions of dollars from major corporations under the guise of diversity initiatives to bridge gaps and drive corporate partnerships with minority owned businesses.

46. Johnnie Cochran and Defendant Willie E. Gary co-conspiring with other attorneys solicited unsuspecting individuals at major corporations who have compelling evidence of discriminatory practices. Upon initial engagement and during the course of litigation, these attorneys instruct plaintiffs to steal confidential and privilege company documents under the pretense the information will be used to enhance plaintiff's cases in a judicial system that is historically hard-to-sell on discrimination claims (See paragraph No. 27 above).

47. For an added measure of leverage, Jesse Jackson (Herein "Jackson"), and in some instances along with Al Sharpton, enter the picture with a forcible threat of a national boycott using Jackson's position as the founder of Rainbow Push and 1000 Churches Connected (<http://1000churchesconnected.com>)*. These threats in addition to the insurmountable evidence of systematic discriminatory practices are used to terrorize

company executives with threats of public exposure. Faced with the real potential of an Enron-styled fiasco or worse, these company executives surrender to these demands.

* 1000 Churches Connected is an organization founded by Jesse Jackson in 2001 masquerading as economic empowerment and equality for African Americans. In reality this organization of thousands of unsuspecting clergymen (male and female) across the U.S. and 4 International regions, is used as a racketeering and extortion ring to bilk millions from U.S. corporations. This organization is made up of some of the most influential pastors in this country servicing as many as 30,000 to 50,000 worshippers locally and hundreds of millions across the U.S. and internationally.

THE SCAM'S AFTERMATH

48. Once payment is secured, terms finalized, and a non-disclosure agreement has been reached between these corporations and the corrupt organization of individuals, the plaintiff's attorneys execute a methodical and heinous plot to force the unsuspecting plaintiffs to go away. These attorneys file fraudulent documents in court; provide false statements to plaintiffs' regarding the status of their claims; withhold key evidence in cases; and if they are still unable to force plaintiffs to abandon their claims, these individuals implement a deliberate maniacal plan including breaking in to plaintiffs' resident to steal evidence; participating in attempted vehicular homicide; and, issuing warnings and death threats.

49. Women and minority owned businesses that are suppose to be the real recipients of these corporate billion dollar diversity programs lose their corporate contracts to white-male business owners (willing participants in defrauding the government) who are illegally switching their businesses into their wives' name.

50. The government, the public, women and minority business owners and the plaintiffs are the true victims in this corruption and having no knowledge of this scam and are left with nothing. In fact, the plaintiffs' upon losing employment are faced with every attempt by this corrupt organization to wipe their existence from the earth. The women and minority owned businesses are left contract-less and disillusioned about the true purpose of these diversity programs.

CLOSING

51. This corrupt organization headed by Jesse Jackson, Johnnie Cochran and the Defendant Willie Gary never intended for people of color to ever benefit from these programs. This corrupt organization is only interested in fulfillment of their own selfish greed to gain enough power and influence to buy their way into political office including the presidency of the United States.

52. With malice and a contemptible betrayal to the American people, this organization of thieves, have wrangled close to a billion dollars from corporations such as Coca-Cola, Ford Motor, Visteon, Microsoft and many others. They have committed fraud against the government and innocent people victimized by the heinous discrimination practices of these corporations. They have made a mockery of the Civil Rights Movement by claiming to set the masses free, yet only to spit in their clients faces while simultaneously pouring salt in their wounds. And, they do this with contemptible pride all in the name of funding their lavish corruptive lifestyles while perpetrating that they love God.

Request to Charge

53. Plaintiffs files this "Request to Charge" to commence a criminal action based on facts outlined above and information communicated to this Court in the above styled case.

54. Plaintiff further files this "Request to Charge" to commence a criminal action based on failure of the United States Attorney's Office (herein U.S. Attorney's Office) to do so.

- a. April 2004, Plaintiffs were two of several individuals who contacted the United States Attorney's Office in Atlanta. Paul Monnin, Assistance U.S. Attorney,

requested the parties to file a joint complaint with his department. On April 8, 2004, the parties including the Plaintiffs submitted a joint criminal complaint to Paul Monnin (Attached hereto as Exhibit G).

- b. On April 14, 2004, Paul Monnin, told Plaintiffs that the claims stated were different than the current Coca-Cola financial criminal acts, and that Plaintiff should return to the Federal Bureau of Investigation's (herein "FBI") office to seek further assistance.
- c. On April 27, 2004, the parties including Plaintiffs met with Matthew J. Ross, F.B.I Special Agent, and were told by Mr. Ross that he would pass the information on to his superiors to determine next steps.
- d. On May 11, 2004, Plaintiffs with several others, met with Matthew Ross again and were told that the F.B.I. office could not proceed with an investigation since speaking with Paul Monnin who stated that the U.S. Attorney's Office would not launch an investigation into Plaintiffs allegations (Attached hereto as Exhibit H).

55. Pursuant to L.R. 30.1 of the Federal Criminal Procedure, Plaintiff files her "Request to Charge" only after service proper notice to the Defending parties (Attached hereto as Exhibit I).

56. Plaintiff has the right to initiate a "Request to Charge" for criminal indictment as a Pro Se Plaintiff according to the Federal Rules of Civil Procedure.

57. Additionally, pursuant to the provisions of Criminal Justice Act of 1964 (18 U.S.C. 3006A) as amended by the Act of October 14, 1970 (P.L. 91-447, 91st Cong., 84 Stat. 916), and by Title II of P.L. 98-473, 98 Stat. 1837, the Comprehensive Crime Control Act of 1984, the Judges of the United States District Court for the Northern District of Georgia have adopted, effective March 18, 1986, the following amended Plan for the adequate representation of any person, unable to obtain adequate representation:

- a. who is a person for whom the Sixth Amendment to the Constitution requires the appointment of counsel or for whom, in a case in which he faces loss of liberty, any Federal law requires the appointment of counsel. Representation shall include counsel and investigative, expert, and other services necessary for an adequate defense and may request such services

in an ex parte application submitted to a judge before whom the case is pending, or before a magistrate if the services are required in connection with a matter over which the magistrate has jurisdiction (or if the judge otherwise refers such application to a magistrate for findings and report).

58. Plaintiffs in this case are on the offense and have lost the liberty to their civil rights because of the criminal acts of the Defendants. Plaintiffs were not able to receive representation through the U.S. Attorney's office to prosecute Defendants for criminal acts.

59. Moreover, the Court has the judicial authority to enforce the law, to report criminal acts and to assist the Plaintiff in initiating the prosecution of the criminal acts contend in the "Request to Charge" for speedy trial.

60. Plaintiff "Request to Charge" cannot be rejected nor stricken from the Court for the following reason:

- a. Plaintiffs made known to the Court that the Defendants withheld documents and materials facts from the Court with intent to defraud the United States Northern District Court.
- b. Defendants, Gary, Williams, Parenti, Finney, Lewis, McManus, Watson & Sperando did not oppose Plaintiffs

claim of fraud upon submitting a Motion to Withdraw as their legal representation.

- c. Plaintiffs do not have any intention to prejudice the Court during pleadings but to seek justice for criminal acts within statute of limitation.

61. In conclusion for all the above reasons, Plaintiffs have shown good cause for this "Request to Charge" must be granted, and seeks the Court's assistance to bring a criminal indictment against all the Defendants, and to issue a Stay in the above styled case pending the outcome of a federal investigation.

Count One
Conspiracy To Obstruct Justice, Making False Statements, and
Committing Perjury In Violation Of Title 18, § 371.

62. At all times material facts to this indictment are available in Sharron Mangum vs. The Coca-Cola Company, Civil Action File Nos. 1:01-CV-2866 (RWS) and 1:03-CV-223 (RWS), Goodman and Mangum, et. al. vs. Gary, et. al. Civil Action File No. 1:03-CV-3387 (RWS), Goodman vs. The Coca-Cola Company, Civil Action File No. 1:00-CV-1774 (RWS) and Ajibola "Tai" Laosebikan vs. The Coca-Cola Company, Civil Action File No. 1:01-CV-3040 (RWS).

- a. Defendant, WILLIE E. GARY ("GARY"), with malice to obstruct justice; conspired to using and approving

documents submitted to defraud the Court and conceal evidence.

- b. Defendant, TRICIA P. HOFFLER ("HOFFLER"), with malice to obstruct justice; conspired to using and approving documents submitted to defraud the Court and conceal evidence.
- c. Defendant, F. SHIELDS MCMANUS ("MCMANUS"), with malice to obstruct justice; conspired to using and approving documents submitted to defraud the Court and conceal evidence.
- d. Defendant, MARY ANN DIAZ ("DIAZ"), with malice to obstruct justice; conspired to creating and using false documents; making false statements; and committing perjury in a federal case.
- e. Defendant, JEROME STONE ("STONE"), with malice to obstruct justice; conspired to creating and using false documents; making false statements to a federal agent; and committing perjury in a federal case.
- f. Defendants, THE GARY FIRM'S Attorneys and its entities conspired with KING & SPALDING LLP. Attorneys, to maliciously and feloniously obstruct justice; conceal evidence; withhold evidence from the Court;

misrepresent material facts presented to the Court and participate in bribery to conceal its crimes.

- g. Defendants, GARY, WILLIAM, PARENTI, FINNEY, LEWIS, McMANUS, WATSON & SPERANDO, P.C conspired with THE COCA-COLA COMPANY to maliciously obstruct justice by; concealing or withholding evidences from the United States Northern District Court; concealing or withholding material facts from the United States Northern District Court; misrepresenting material facts presented to the United States Northern District Court; filing fraudulent motions; giving and accepting bribes to conceal its fraud upon the Court and Plaintiff.

COUNT TWO
MAKING FALSE STATEMENTS TO THE UNITED STATES NORTHERN DISTRICT
COURT IN VIOLATION OF TITLE 18, § 1002

63. At all times material facts to this indictment are available in Sharron Mangum vs. The Coca-Cola Company, Civil Action File Nos. 1:01-CV-2866 (RWS) and 1:03-CV-223 (RWS), Goodman and Mangum, et. al. vs. Gary, et. al. Civil Action File No. 1:03-CV-3387 (RWS), Goodman vs. The Coca-Cola Company, Civil Action File No. 1:00-CV-1774 (RWS) and Ajibola ÔTaiÓ Laosebikan vs. The Coca-Cola Company, Civil Action File No. 1:01-CV-3040 (RWS).

- a. Defendants, THE GARY FIRM'S Attorneys and its entities conspired with KING & SPALDING LLP. Attorneys, to maliciously and feloniously obstruct justice; conceal evidence; withhold evidence from the Court; misrepresent material facts presented to the Court and participate in bribery to conceal its crimes.
- b. Defendants, GARY, WILLIAM, PARENTI, FINNEY, LEWIS, McMANUS, WATSON & SPERANDO, P.C. conspired with THE COCA-COLA COMPANY to maliciously obstruct justice by; concealing or withholding evidences from the United States Northern District Court; concealing or withholding material facts from the United States Northern District Court; misrepresenting material facts presented to the United States Northern District Court; filing fraudulent motions; giving and accepting bribes to conceal its fraud upon the Court and Plaintiff.

**COUNT THREE
CREATING AND USING FALSE DOCUMENTS IN VIOLATION OF TITLE
18, § 1028**

64. At all times material facts to this indictment are available in Sharron Mangum vs. The Coca-Cola Company, Civil Action File Nos. 1:01-CV-2866 (RWS) and 1:03-CV-223 (RWS), Wallace and Mangum vs. The Coca-Cola Company, Civil Action File

No. 1:03-CV-2739 (RWS), Goodman and Mangum, et. al. vs. Gary, et. al. Civil Action File No. 1:03-CV-3387 (RWS), Goodman vs. The Coca-Cola Company, Civil Action File No. 1:00-CV-1774 (RWS) and Ajibola "Tai" Laosebikan vs. The Coca-Cola Company, Civil Action File No. 1:01-CV-3040 (RWS).

- a. Defendant, WILLIE E. GARY ("GARY"), with malice to obstruct justice; conspired to using and approving documents submitted to defraud the Court and conceal evidence.
- b. Defendant, TRICIA P. HOFFLER ("HOFFLER"), with malice to obstruct justice; conspired to using and approving documents submitted to defraud the Court and conceal evidence.
- c. Defendant, F. SHIELDS MCMANUS ("MCMANUS"), with malice to obstruct justice; conspired to using and approving documents submitted to defraud the Court and conceal evidence.
- d. Defendant, MARY ANN DIAZ ("DIAZ"), with malice to obstruct justice; conspired to creating and using false documents; making false statements; and committing perjury in a federal case.
- e. Defendant, JEROME STONE ("STONE"), with malice to obstruct justice; conspired to creating and using

false documents; making false statements to a federal agent; and committing perjury in a federal case.

f. Defendants, THE GARY FIRM'S Attorneys and its entities conspired with KING & SPALDING LLP. Attorneys, to maliciously and feloniously obstruct justice; conceal evidence; withhold evidence from the Court; misrepresent material facts presented to the Court and participate in bribery to conceal its crimes.

g. Defendants, GARY, WILLIAM, PARENTI, FINNEY, LEWIS, McMANUS, WATSON & SPERANDO, P.C conspired with THE COCA-COLA COMPANY to maliciously obstruct justice by; concealing or withholding evidences from the United States Northern District Court; concealing or withholding material facts from the United States Northern District Court; misrepresenting material facts presented to the United States Northern District Court; filing fraudulent motions; giving and accepting bribes to conceal its fraud upon the Court and Plaintiff.

COUNT FOUR
PERJURY IN VIOLATION OF TITLE 18, § 1621, § 1622 & § 1623

65. At all times material facts to this indictment are available in Sharron Mangum vs. The Coca-Cola Company, Civil

Action File Nos. 1:01-CV-2866 (RWS) and 1:03-CV-223 (RWS), Goodman and Mangum, et. al. vs. Gary, et. al. Civil Action File No. 1:03-CV-3387 (RWS), Goodman vs. The Coca-Cola Company, Civil Action File No. 1:00-CV-1774 (RWS) and Ajibola "Tai" Laosebikan vs. The Coca-Cola Company, Civil Action File No. 1:01-CV-3040 (RWS).

- a. Defendant, WILLIE E. GARY ("GARY"), with malice to obstruct justice; conspired to creating and using false documents; making false statements; and committing perjury in a federal case.
- b. Defendant, TRICIA P. HOFFER ("HOFFLER"), with malice to obstruct justice; conspired to creating and using false documents; making false statements to a federal agent; and committing perjury in a federal case.
- c. Defendant, F. SHIELDS MCMANUS ("MCMANUS"), with malice to obstruct justice; conspired to creating and using false documents; making false statements; and committing perjury in a federal case.
- d. Defendant, MARY ANN DIAZ ("DIAZ"), with malice to obstruct justice; conspired to creating and using false documents; making false statements; and committing perjury in a federal case.

- e. Defendant, JEROME STONE ("STONE"), with malice to obstruct justice; conspired to creating and using false documents; making false statements; and committing perjury in a federal case.

COUNT FIVE

OBSTRUCTION OF JUSTICE IN VIOLATION OF TITLE 18, § 1506 & § 1509

66. At all times material facts to this indictment are available in Sharron Mangum vs. The Coca-Cola Company, Civil Action File Nos. 1:01-CV-2866 (RWS) and 1:03-CV-223 (RWS), Goodman and Mangum, et. al. vs. Gary, et. al. Civil Action File No. 1:03-CV-3387 (RWS), Goodman vs. The Coca-Cola Company, Civil Action File No. 1:00-CV-1774 (RWS) and Ajibola "Tai" Laosebikan vs. The Coca-Cola Company, Civil Action File No. 1:01-CV-3040 (RWS).

- a. Defendant, WILLIE E. GARY ("GARY"), with malice to obstruct justice; conspired to using and approving documents submitted to defraud the Court and conceal evidence.
- b. Defendant, TRICIA P. HOFFLER ("HOFFLER"), with malice to obstruct justice; conspired to using and approving documents submitted to defraud the Court and conceal evidence.

- c. Defendant, F. SHIELDS MCMANUS ("MCMANUS"), with malice to obstruct justice; conspired to using and approving documents submitted to defraud the Court and conceal evidence.
- d. Defendant, MARY ANN DIAZ ("DIAZ"), with malice to obstruct justice; conspired to creating and using false documents; making false statements; and committing perjury in a federal case.
- e. Defendant, JEROME STONE ("STONE"), with malice to obstruct justice; conspired to creating and using false documents; making false statements to a federal agent; and committing perjury in a federal case.
- f. Defendants, THE GARY FIRM Attorneys and its entities conspired with KING & SPALDING LLP Attorneys, to maliciously and feloniously obstruct justice; conceal evidence; withhold evidence from the Court; misrepresent material facts presented to the Court and participate in bribery to conceal its crimes.
- g. Defendants, GARY, WILLIAM, PARENTI, FINNEY, LEWIS, MCMANUS, WATSON & SPERANDO, P.C. conspired with THE COCA-COLA COMPANY to maliciously obstruct justice by; concealing or withholding evidences from the United States Northern District Court; concealing or

withholding material facts from the United States Northern District Court; misrepresenting material facts presented to the United States Northern District Court; filing fraudulent motions; giving and accepting bribes to conceal its fraud upon the Court and Plaintiff.

COUNT SIX
FRAUD IN VIOLATION OF TITLE 18, § 1031

67. At all times material facts to this indictment are available in Sharron Mangum vs. The Coca-Cola Company, Civil Action File Nos. 1:01-CV-2866 (RWS) and 1:03-CV-223 (RWS), Goodman and Mangum, et. al. vs. Gary, et. al. Civil Action File No. 1:03-CV-3387 (RWS), Goodman vs. The Coca-Cola Company, Civil Action File No. 1:00-CV-1774 (RWS) and Ajibola "Tai" Laosebikan vs. The Coca-Cola Company, Civil Action File No. 1:01-CV-3040 (RWS).

- a. Defendant, WILLIE E. GARY ("GARY"), with malice to obstruct justice; conspired to using and approving documents submitted to defraud the Court and conceal evidence.
- b. Defendant, TRICIA P. HOFFLER ("HOFFLER"), with malice to obstruct justice; conspired to using and approving

documents submitted to defraud the Court and conceal evidence.

- c. Defendant, F. SHIELDS MCMANUS ("McMANUS"), with malice to obstruct justice; conspired to using and approving documents submitted to defraud the Court and conceal evidence.
- d. Defendants, THE GARY FIRM Attorneys and its entities conspired with KING & SPALDING LLP Attorneys, to maliciously and feloniously obstruct justice; conceal evidence; withhold evidence from the Court; misrepresent material facts presented to the Court and participate in bribery to conceal its crimes.
- e. Defendants, GARY, WILLIAM, PARENTI, FINNEY, LEWIS, McMANUS, WATSON & SPERANDO, P.C. conspired with THE COCA-COLA COMPANY to maliciously obstruct justice by; concealing or withholding evidences from the United States Northern District Court; concealing or withholding material facts from the United States Northern District Court; misrepresenting material facts presented to the United States Northern District Court; filing fraudulent motions; giving and accepting bribes to conceal its fraud upon the Court and Plaintiff.

COUNT SEVEN
OBSTRUCTION OF JUSTICE IN VIOLATION OF TITLE 18, § 1512

68. At all times material facts to this indictment are available in Sharron Mangum vs. The Coca-Cola Company, Civil Action File Nos. 1:01-CV-2866 (RWS) and 1:03-CV-223 (RWS), Goodman and Mangum, et. al. vs. Gary, et. al. Civil Action File No. 1:03-CV-3387 (RWS), Goodman vs. The Coca-Cola Company, Civil Action File No. 1:00-CV-1774 (RWS) and Ajibola "Tai" Laosebikan vs. The Coca-Cola Company, Civil Action File No. 1:01-CV-3040 (RWS).a. Defendant, WILLIE E. GARY ("GARY"), with malice to obstruct justice; conspired to using and approving documents submitted to defraud the Court and conceal evidence.

a. Defendant, TRICIA P. HOFFLER ("HOFFLER"), with malice to obstruct justice; conspired to using and approving documents submitted to defraud the Court and conceal evidence.

b. Defendant, F. SHIELDS MCMANUS ("MCMANUS"), with malice to obstruct justice; conspired to using and approving documents submitted to defraud the Court and conceal evidence.

c. Defendant, MARY ANN DIAZ ("DIAZ"), with malice to obstruct justice; conspired to creating and using

false documents; making false statements; and committing perjury in a federal case.

- d. Defendant, JEROME STONE ("STONE"), with malice to obstruct justice; conspired to creating and using false documents; making false statements to a federal agent; and committing perjury in a federal case.
- e. Defendants, THE GARY FIRM Attorneys and its entities conspired with KING & SPALDING LLP Attorneys, to maliciously and feloniously obstruct justice; conceal evidence; withhold evidence from the Court; misrepresent material facts presented to the Court and participate in bribery to conceal its crimes.
- f. Defendants, GARY, WILLIAM, PARENTI, FINNEY, LEWIS, McMANUS, WATSON & SPERANDO, P.C. conspired with THE COCA-COLA COMPANY to maliciously obstruct justice by; concealing or withholding evidences from the United States Northern District Court; concealing or withholding material facts from the United States Northern District Court; misrepresenting material facts presented to the United States Northern District Court; filing fraudulent motions; giving and accepting bribes to conceal its fraud upon the Court and Plaintiff.

COUNT EIGHT
OBSTRUCTION OF JUSTICE IN VIOLATION OF TITLE 18, § 1513

69. At all times material facts to this indictment are available in Sharron Mangum vs. The Coca-Cola Company, Civil Action File Nos. 1:01-CV-2866 (RWS) and 1:03-CV-223 (RWS), Goodman and Mangum, et. al. vs. Gary, et. al. Civil Action File No. 1:03-CV-3387 (RWS), Goodman vs. The Coca-Cola Company, Civil Action File No. 1:00-CV-1774 (RWS) and Ajibola "Tai" Laosebikan vs. The Coca-Cola Company, Civil Action File No. 1:01-CV-3040 (RWS).

- a. Defendant, WILLIE E. GARY ("GARY"), with malice to obstruct justice; conspired to using and approving documents submitted to defraud the Court and conceal evidence.
- b. Defendant, TRICIA P. HOFFLER ("HOFFLER"), with malice to obstruct justice; conspired to using and approving documents submitted to defraud the Court and conceal evidence.
- c. Defendant, F. SHIELDS McMANUS ("MCMANUS"), with malice to obstruct justice; conspired to using and approving documents submitted to defraud the Court and conceal evidence.

- d. Defendant, MARY ANN DIAZ ("DIAZ"), with malice to obstruct justice; conspired to creating and using false documents; making false statements; and committing perjury in a federal case.
- e. Defendant, JEROME STONE ("STONE"), with malice to obstruct justice; conspired to creating and using false documents; making false statements to a federal agent; and committing perjury in a federal case.
- f. Defendants, THE GARY FIRM Attorneys and it entities conspired with KING & SPALDING LLP. Attorneys, to maliciously and feloniously obstruct justice; conceal evidence; withhold evidence from the Court; misrepresent material facts presented to the Court and participate in bribery to conceal its crimes.
- g. Defendants, GARY, WILLIAM, PARENTI, FINNEY, LEWIS, McMANUS, WATSON & SPERANDO, P.C. conspired with THE COCA-COLA COMPANY to maliciously obstruct justice by; concealing or withholding evidences from the United States Northern District Court; concealing or withholding material facts from the United States Northern District Court; misrepresenting material facts presented to the United States Northern District Court; filing fraudulent motions; giving and accepting

bribes to conceal its fraud upon the Court and Plaintiff.

COUNT NINE
RACKETEERING INFLUENCED AND CORRUPT ORGANIZATION (RICO) IN
VIOLATION OF GEORGIA RICO STATUTE OCGA OCGA § 16-14-4(a), (b),
and (c)

70. At all times material facts to this indictment are available in Sharron Mangum vs. The Coca-Cola Company, Civil Action File Nos. 1:01-CV-2866 (RWS) and 1:03-CV-223 (RWS), Goodman and Mangum, et. al. vs. Gary, et. al. Civil Action File No. 1:03-CV-3387 (RWS), Goodman vs. The Coca-Cola Company, Civil Action File No. 1:00-CV-1774 (RWS) and Ajibola "Tai" Laosebikan vs. The Coca-Cola Company, Civil Action File No. 1:01-CV-3040 (RWS).

- a. Defendants, THE GARY FIRM Attorneys and its entities conspired with KING & SPALDING LLP. Attorneys, to maliciously and feloniously obstruct justice; conceal evidence; withhold evidence from the Court; misrepresent material facts presented to the Court and participate in bribery to conceal its crimes.
- b. Defendants, GARY, WILLIAM, PARENTI, FINNEY, LEWIS, McMANUS, WATSON & SPERANDO, P.C. conspired with THE COCA-COLA COMPANY to maliciously obstruct justice by; concealing or withholding evidences from the United

States Northern District Court; concealing or
withholding material facts from the United States
Northern District Court; misrepresenting material
facts presented to the United States Northern District
Court; filing fraudulent motions; giving and accepting
bribes to conceal its fraud upon the Court and
Plaintiff.

Respectfully submitted this the ____ day of February 2005.

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PLAINTIFFS IN PROPRIA PERSONA

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

MARIETTA GOODMAN AND
SHARRON MANGUM on behalf of
themselves and all others similarly
situated,

Plaintiffs

Vs.

WILLIE E. GARY, TRICIA P. HOFFLER,
F. SHIELDS MCMANUS,
MARY ANN DIAZ, JEROME STONE,
GARY, WILLIAMS, PARENTI,
FINNEY, LEWIS, MCMANUS,
WATSON, AND SPERANDO, P.C.,
MAJOR BROADCAST CABLE

Defendants.

COMPLAINT - CLASS ACTION

NO. 1:03-CV-3387- RWS

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the within and foregoing **REQUEST TO CHARGE** by depositing same in the United States Mail with sufficient postage thereon and addressed as follows:

Brent L. Wilson, Esq.
Elarbee, Thompson, Sapp & Wilson, LLP
800 International Tower
229 Peachtree Street, N.E.
Atlanta, Georgia 30303

F. Shields McManus
Gary, Williams, Parenti, Finney, Lewis, et al.
221 East Osceola Street
Stuart, FL 34994

Respectfully submitted this the ____ day of February 2005.

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PLAINTIFFS IN PROPRIA PERSONA