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ROWE ENTERTAINMENT et al., :

Plaintiffs, :

-against- :

WILLIAM MORRIS AGENCY, et al. :

Defendants. :

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Affidavit of Leonard Rowe in support of $100,000,000 Commercial Lien against attorney Willie E. Gary for fraud and conspiracy

A Security (15 USC)
Commercial Affidavit

STATE OF GEORGIA)
) SS.:
COUNTY OF FULTON)

NAME AND ADDRESS OF LIEN DEBTOR

Willie E. Gary
36 Rio Vista Dr.
Stuart, Florida 34996

Willie E. Gary
3786 NW Deer Oak Dr.
Jensen Beach, FL 34957

I, LEONARD ROWE, Being duly sworn, hereby depose and states: I am not an enemy of the United States or of a corporation created under law in the United States.

This commercial lien and affidavit is being filed against Willie E. Gary and his co-conspirators for the illegal possession, theft and concealment of property that rightfully belongs to me, the affiant, Leonard Rowe, as well as for fraud and conspiracy. This property, for which I paid the entire cost to obtain ($200,000.00), consists of the hundreds of emails that contain the usage of the despicable word "nigger" AND OTHER DEROGATORY TERMS which were extracted from the email files of executives at The William Morris AGENCY and Creative Artist Agency -- Defendants in a seven hundred and fifty million dollar ($750,000,000.00) antitrust AND human rights case (See "Exhibit A"). This illegal theft and concealment of property that rightfully belongs to me, has caused me and my family insurmountable harm and a substantial financial loss of over 1 billion dollars, which I truly feel would have been awarded by AN IMPARTIAL jury if not for

this illegal concealment and theft of SMOKING GUN EVIDENCE by these corrupt individuals, companies and law firms that engaged in this heinous conspiracy, which is still ongoing.

This action is taken in accordance with New York Judicial Law 487: NY code – section 487 misconduct by attorneys and fraud upon the court. An attorney or counselor who: Is guilty of any deceit or collusion or consents to any deceits or collusion with intent to deceive the court or any party or willfully delays his clients suit with a view to his own gain; or, willfully receives any money or allowance for or on account of any money which he has not laid out, or becomes answerable for, is guilty of a misdemeanor, or in addition to the punishment prescribed therefore by the penal law, he forfeits to the party injured treble damages, to be recovered in a Civil Action.

1. I, Leonard Rowe do solemnly swear and depose that I am competent to state the matters set fourth herein. That I have complete and personal knowledge of the facts stated herein. That all the facts stated herein are true, correct and certain and if called to testify as a witness, I will be glad to testify to their veracity.

   The Maxims principles of commercial law are:

   a. A workman is worthy of his hire
   b. All are equal under the law
   c. In commerce truth is sovereign
   d. Truth is expressed in the form of a affidavit
   e. An unrebutted affidavit stands as truth in commerce
   f. An unrebutted affidavit becomes the judgment in commerce
   g. In commerce all matters must be expressed to be resolved
   h. He who leaves the battlefield first loses by default
   i. Sacrifice is the measure of credibility
   j. A lien or claim can only be satisfied through an affidavit by a point for point rebuttal, settlement or by a jury.
   k. Fraud vitiates all agreements and judgments
   l. Thou shall not steal
   m. Do unto others as you would have others do unto you
   n. Truth will out
   o. Notice to the agent is notice to the principle, and notice to the principle is notice to the agent.

2. **The law firm of SNR/Dentons LLP and The Willie Gary Law Firm, which was the former law firms of the plaintiffs in the above captioned case, engaged in fraud upon**

the court and conspired with defendants and their law firms as well as the court in this landmark $750,000,000 antitrust discrimination law suit, Rowe Entertainment Inc. vs. The William Morris Agency et. al. (98-CIV-8272). They defrauded their own clients, which include the affiant, for the sole purpose of enriching themselves.

3. I, Leonard Rowe, truthfully submit this affidavit in support of invoking a commercial lien against Willie E. Gary and all parties that have conspired to deprive my family and I of our rights to life, liberty, and happiness and violate our constitutional and human rights. This lien will be publically advertised and filed in various cities throughout America and select countries around the world.

4. No judge, or court or any agencies thereof, or any third parties can abrogate anyone's affidavit of truth and only a party affected by this affidavit can speak and act for himself and is solely responsible for responding with his own affidavit of truth, which no one else may do for him.

GENERAL BACKGROUND

5. I have worked in the entertainment industry for over 30 years and during those years, I have dealt with practically all major talent agencies that represent performing musical entertainers of all kinds. I also served as president of the Black Promoters Association (BPA) from 1996 to 2006. I have toured entertainers all over America and abroad, such as Michael Jackson, The Jacksons, Prince, R. Kelly, and many others. During my entire career in the music industry, I have dealt with the William Morris Agency, Creative Artist Agency, and other major agencies in the Entertainment Industry on an on-going basis and have first-hand knowledge of the racist and discriminatory principles, policies and practices of that industry.

6. In 1998, I – along with three other African American concert promoters – brought an action against the William Morris Agency and 32 other defendants alleging various causes of action including, but not limited to, anti-trust violations, civil rights violations under 42 U.S.C. § 1981 and other claims for relief. After incriminating evidence was revealed during discovery, 28 of the defendants decided to settle. Three years after extensive discovery, pre-trial motion practice, and oral argument for summary judgment, Judge Robert P. Patterson of the Southern District of New York granted summary judgment to the remaining five defendants. The court's opinion made only a small footnote mention of the derogatory utilization of the terms "nigger" (which were found in the William Morris Agency and Creative Artist Agency's email records some **349 times**), **"nigga"**, **"spook," "coon," "monkey,"** and other blatant evidence contained in "Exhibit 31/A" which undeniably established that racism in Hollywood is not a myth or a figment of one's imagination. The William Morris Agency, Creative Artist Agency and Hollywood collectively have been, and continue to operate with a

deep animus directed towards persons of African descent and other historically disadvantaged groups. Additionally, Judge Patterson's opinion did not mention substantial documentary evidence that was presented. This evidence contained over 2,600 contracts which showed systemic disparities in contracting between African Americans, who are members of a protected class, versus white promoters who were given more favorable terms and conditions (e.g. 0 - 10% deposits for whites and 50% deposits for blacks) — a clear violation of 42 USC § 1981. He also did not mention that the William Morris Agency could not produce one contract showing that they have allowed an African American promoter to engage in a contract with one of the white artists on their roster for a concert in their over one hundred plus year history of doing business. Not one. Judge Patterson also made no mention in his opinion that a hand written note that was discovered where an agent stated, "Do not divulge guarantee to black promoters," and hundreds of other pieces of damaging evidence showing discrimination and violation of the anti-trust laws by WMA and CAA. It is extremely important to note that while Judge Patterson weighed certain evidence during the summary judgment phase of our case, he did not consider "Exhibit 31/A" or the underlying emails because of the criminal actions and ethical misconduct of my former attorneys, at Dentons LLP, and Defendant's law firm Loeb & Loeb LLP, the William Morris Agency, Creative Artist Agency and others that were involved in this heinous conspiracy. In short, the underlying emails to "Exhibit 31/A" were improperly and illegally concealed from me and the court. Given that the Willie Gary Firm was not involved in electronic discovery, they cannot be held responsible for violating the protocol of Judge James C. Francis. However, one question that I have been frequently asked is why didn't Attorney Willie Gary pursue the actual emails after "Exhibit 31/A" was faxed to him by SNR showing the derogatory words being used. The answer to this question is very simple. After reviewing his actions and reviewing the evidence, I truly believe in retrospect that he was also a part of the conspiracy. I believe that he also was compensated by the defendants to do the bare minimum in having these documents produced and just walk away quietly after judgment was made against us. Mr. Gary could have easily filed a motion alleging fraud against his clients by our former attorneys at SNR/Dentons LLP, but he didn't. The main reason for my beliefs is that Mr. Gary worked on a contingency basis and allowed this type of fraud to take place against his clients. Not only were we defrauded as Plaintiffs, but if he were not involved in this conspiracy, he and his firm would have been defrauded as well. However, he allowed this fraud to be perpetrated against us, threw us under the bus, and hasn't said a word about the injustices that have transpired in this case since. His silence speaks volumes.

ELECTRONIC DISCOVERY IN ROWE VS. THE WILLIAM MORRIS AGENCY: HOW I DISCOVERED "EXHIBIT 31" AND WHY THE UNDERLYING EMAILS CONTAINING THE WORD "NIGGER" WERE CONCEALED BY MY OWN ATTORNEYS AT SNR/DENTONS LLP AND THE WILLIE GARY FIRM

7. As our case proceeded and evidence was being discovered, I was unaware of the depth and extent of corruption and collusion that was developing between my former attorneys at Sonnenschein Nath & Rosenthal LLP ("SNR") (formerly known as RubinBaum and now known as Dentons US LLP) – Martin Gold, Raymond Heslin, Richard Primoff, and Christine Lepera – The Willie Gary Firm and attorney Willie Gary - and attorneys for the Defendants, including Michael P. Zweig and Helen Gavaris of Loeb & Loeb LLP and Creative Artist Agency and their law firm Weil Gotshal and Manges and its attorneys Jeffrey Klein and Jeffrey Kessler. They all were involved in this heinous conspiracy to conceal this evidence from the court and me.

8. I asked my attorneys during discovery of our case to file a motion to retrieve the emails of the William Morris Agency and Creative Artist Agency. After our motion was granted by Magistrate Judge James C. Francis, my attorneys at SNR informed me that it would cost approximately $200,000.00 to retrieve the emails from the William Morris Agency and CAA for discovery purposes in our on-going litigation, in which I agreed to pay. We continued to use the services of Electronic Evidence Discovery (now known as Discovery Technology, Inc.) – a company from Seattle, Washington – to perform the duty of retrieving the emails. I was then asked by Mr. Martin Gold and Richard Primoff at SNR to provide the names of agent's emails that we wanted EED to search. For the William Morris Agency, I provided the names of the following music agents: Cara Lewis, Jeff Frasco, and Shelly Shultz as well as the heads of the Music Department, Richard Rosenberg and Peter Grosslight. I also provided the names of agents whose emails were to be searched at CAA. I was then asked by my attorneys at SNR to provide derogatory words to be searched for, which I also provided and are found on "Exhibit 31/A."

9. On the day I was told that the results would be in, I began calling SNR early that morning. I was unable to reach anyone at SNR…no one would pick up my call. There were five attorneys working on our case at SNR and I found this to be highly unusual because this had never happened before. At 6pm that afternoon, knowing that it was time for everyone to go home for the day, I decided to make one final attempt to reach attorney Richard Primoff. He was the attorney that was overseeing email discovery in our case. Mr. Primoff finally answered my call. I then asked him about the emails and had the results returned. He informed me that they had returned and nothing of substantiality was found as a result of the email search. He then stated that I had lost my $200,000.00 and that it was wasted. When this was being told to me, I could tell that he was not being truthful, but at the time I had no proof of this. I later asked for SNR to send all of the email search results and findings, as well as all documents, to me in Georgia. I received the non-privileged emails about one week later at my home in Atlanta. After carefully examining each document that my former attorneys at SNR provided to me, I found nothing of use that would help us in proving our claims against

the William Morris Agency or CAA. Having worked in that industry for over 25 years at the time and experiencing the racism that I and other African Americans had to endure from the William Morris Agency and Creative Artist Agency, I found this to be totally impossible to believe.

10. A few weeks later, I was called to the office of SNR in New York for a meeting with another attorney that was working on our case by the name of Raymond Heslin. While waiting outside of Mr. Heslin's office for him to finish a phone conversation he was having, I overheard him on the phone with someone discussing a meeting that they had with opposing counsel in my case, a few days prior. This was very alarming to me because I, nor any of the other Plaintiffs, had been informed of this meeting. After he finished his call, I went into his office and as I was sitting down, he received another phone call. He then turned his back to me for privacy. I happened to glance down on his desk and I saw a small stack of papers. On the cover page of that stack, was the heading 'Rowe Entertainment vs. The William Morris Agency Email Results'. It was then that I observed that the word "nigger" was lined down the entire first page of the report. When Attorney Heslin finished his call, I asked him "What is that?" pointing to the email results report on his desk. Mr. Heslin then turned the report over in my face and told me that I was not supposed to see that. I then asked "Why?" since it pertained to my case. Heslin then got very angry and argumentative with me. I immediately left out of his office and called our co-counsel in Florida, Mr. Willie Gary of the Gary Law Firm, and told him about what I saw on attorney Heslin's desk. Mr. Gary then called SNR and asked that the email report, now known as "Exhibit 31/A," be faxed to him immediately. This is how and why the report shows the fax ID of SNR at the top of each page of the report. They only sent the email results summary report to the Gary Firm. This is how the Gary Firm eventually gained possession of "Exhibit 31/A." I truly believe God intended for me to see that document. Before "Exhibit 31/A" was faxed on October 15, 2002, my attorneys at the Willie Gary Firm said that they had no knowledge that this document existed.

11. "Exhibit 31/A" was introduced to the court some time after I discovered the document on the desk of Mr. Raymond Heslin. Discovery in our case was closed at the time in which I discovered it. My attorneys at the Gary Firm argued to have "Exhibit 31/A" admitted into the record as evidence. At oral argument on the motion, no one from Loeb & Loeb LLP or any of the other defendants claimed that "Exhibit 31/A" was unauthentic. They claimed the e-discovery protocol had been violated and suggested that my former counsel "surreptitiously conducted searches of mailbox users without CAA's or WMA's prior knowledge or consent." Therefore, they argued, "Exhibit 31/A" couldn't be "authenticated" and was "inadmissible." Additionally, they argued that discovery was now closed and this document could represent the lyrics from rap music or movie scripts. During that hearing, there was never any mention that this document was fraudulent. The fax ID at the top of each page of the document clearly shows that it was faxed from New York office of SNR. SNR has never

disputed this fact. It's mind boggling what these attorneys and judges have done in order to ensure that racism and racial inequality throughout this industry and America persists. The level of fraud that has been perpetrated upon the court in this case is beyond the level of criminal prosecution.

12. When I was in Florida at the Willie Gary Firm helping my attorneys prepare our reply to the Defendants' summary judgment motion in April 2003, I personally saw "Exhibit 31/A" in its entirety. It contained all pages, including 1 and 17, which are now mysteriously missing. At that time, it contained the word "nigger" 349 times, but now, the document submitted to the court reflects a drastically lower number: 76. This is when I believe The Willie Gary firm entered this conspiracy. Like other situations in my case, fraud has occurred somewhere with this document. It is very difficult for me to believe that a qualified attorney such as Mr. Bill Campbell – who received an undergraduate degree from Vanderbilt University and a law degree from Duke University, was also a former US prosecutor, as well as the former two-term mayor of Atlanta, Georgia – could make a mathematical error of this magnitude. His accounting of the word being used was off some 273 times, and I find this very hard to believe knowing Mr. Campbell, and how detailed and thorough he is when engaging in his work.

13. Michael Zweig, Loeb & Loeb and their co-conspirators have made many excuses for the email result findings. Their first excuse, when first discussed in open court, on the record, was "this evidence could be the results of rap lyrics or from movie scripts." This excuse is laughable because if that were true, why are the emails being concealed? There would be no harm in bringing the actual emails forward because that would prove that the contents are from the lyrics of rap artists or the scripts of movies. This would totally extinguish our allegations and claims against their clients concerning "Exhibit 31/A" and would also put all allegations concerning "nigger" and other despicable words being used in their emails to rest. As of yet, they have not done so and they never will, without being forced to do so, because they know that their excuses are totally false and perjurious. The latest excuse they have used is that this document "may be bogus." If that was true, then fraud has been perpetrated against CAA and the William Morris Agency, who is probably one of Loeb & Loeb LLP's biggest clients. This fraud would have had to be perpetrated by not only myself and other black concert promoters, but by the Willie Gary Law Firm as well, because they are the ones who submitted this document to the court. Why wouldn't Loeb and Loeb file criminal charges against us if they truly believed that fraud took place against their largest client, especially since they adamantly maintain that their client has never engaged in unlawful discrimination? They should have demanded a full investigation take place concerning this document. They also could have subpoenaed the files of EED and the fax phone line records of SNR to find out if this document was fraudulent, but they didn't. The reason they didn't do any of this is very simple: they are lying and if they called in the US Attorney's office or

reported this to the FBI, their unlawful conduct, as well as the numerous crimes they have committed, would be revealed. I have asked Judge Patterson, as well as Chief Judge Loretta Preska of the Southern District of New York, on numerous occasions, by personally writing letter after letter and having other concerned American citizens of all races and color do the same, to please refer this case to the US Attorney's Office of the Southern District of New York, the FBI, as well as to all state and bar disciplinary committees where these attorneys are licensed to practice law. They both have refused these requests and have allowed these criminally corrupt and morally bankrupt individuals to go unpunished for the millions of lives they have destroyed.

LEONARD ROWE FILES FRCP 60 MOTION DUE TO "FRAUD UPON THE COURT." FORMER ATTORNEYS FROM SNR/DENTONS LLP STATE "NO DEROGATORY TERMS" WERE EVER DISCOVERED. BOOKING AGENCY DEFENDANTS REMAIN SILENT.

14. After my petition for a writ of certiorari was denied by the Supreme Court on October 2, 2006 and my complaint to have two of my former attorneys disbarred in 2010 was whitewashed by the Departmental Disciplinary Committee ("DDC"), I, Leonard Rowe, then a pro se litigant, filed a FRCP 60 Motion on March 2, 2012 requesting that Judge Patterson's January 5, 2005 decision be vacated and set aside in the "interests of justice" due to "fraud upon the Court [and the] destruction of vital evidence" that occurred in my case. As for the six year delay, I was just informed that about one year ago that my case may have involved 'ineffective counsel,' and/or other certain unethical attorney actions, [and] it wasn't **until February 7, 2012** that I specifically learned that [those] actions constituted violations of various crimes." Although all Defendants were served this FRCP 60 Motion, none of the Defendants or my former counsel at SNR/Dentons LLP, the Gary Firm or Bob Donnelly submitted an answer. On April 3, 2012, Judge Patterson ordered the Clerk of Court to specifically compel my former attorneys from SNR/Dentons LLP to respond to his FRCP 60 Motion. Judge Patterson did not order the Defendants to respond.

15. Between May 14 -15, 2012, four of my former attorneys from SNR/Dentons LLP submitted Declarations "under penalty of perjury (Exhibit B)." Attorney Christine Lepera's Declaration contained the least details. She stated that she was "not involved in discovery" and claimed that my "accusations against my former Sonnenschein partners are patently preposterous to me. Certainly, I have no knowledge of any such conduct, never engaged in or assisted in such conduct, and have absolutely no reason to believe that there is a shred of truth to these contentions (see "Exhibit B")."

16. Attorney Richard Primoff – who conducted electronic discovery on behalf of the black

concert promoters – stated: "I can assure you that Mr. Rowe's allegation is completely untrue. On the contrary, my recollection was that the email production Plaintiffs received from defendants yield[ed] nothing of use in proving Plaintiffs' case against Defendants." He then stated that "there was a preliminary statistical report prepared by Plaintiffs' electronic evidence consultants that was used to decide whether it was worthwhile for plaintiffs to pay additional (and substantial) sums to initiate a second, wider search of defendants' email files, according to protocol established by U.S. Magistrate Judge Francis in the case." (emphasis added)(see "Exhibit C").

17. Attorney Ray Heslin stated, "no derogatory terms (232, 349, or 400) were located in the emails of the defendants." (emphasis added) He also stated: "SNR's Richard Primoff conducted the email discovery and informed me that nothing of consequence had been found. Mr. Rowe was told this and certainly never found anything to the contrary on my desk. Furthermore, his assertion that the word 'nigger' was found 232, 349 or 400 times in this discovery is surprising especially since he swears that we never gave him this material." (emphasis added)(see "Exhibit D").

18. The original and lead attorney for this case – Martin R. Gold – was the last attorney to submit his Declaration. On May 15, 2012, he stated, "The substance of Mr. Rowe's allegations – that I and other attorneys at my firm uncovered extensive damaging evidence in discovery which we withheld from him and the other plaintiffs because we were conspiring with the defendants, and that we wrongfully withdrew from the case to allow the defendants to prevail in their summary judgment motions – are, in all events, utterly false." He states, "I had no knowledge that the word 'nigger' appeared in documents produced by defendants, and I still have no knowledge that the word so appears. Notably, Mr. Rowe has produced no such documents (see "Exhibit E")."

19. It is clear that none of Plaintiff's former attorneys at SNR knew that "Exhibit 31/A" was actually included in the Plaintiff's opposition to Defendants summary judgment motion or else they wouldn't have shot themselves in the foot by submitting purjurious declarations stating that no derogatory terms were found during the email search of Defendants (see "Exhibit B-E").

20. **In the federal court a represented party who signs his or her name to documents filed in court bares a personal responsibility to certify the truth and reasonableness of the document and the failure to meet that duty may subject the signing to rule eleven sanction. FED. R. CIV. P. 11.**

21. These attorneys submitted their Declarations knowing that I still did not have possession of "Exhibit 31" – or else it would have been included as an exhibit to my FRCP 60 Motion.

However, none of my former attorneys knew that on **May 15, 2012**, I would have Exhibit 31 pulled from the court records, which was eventually included as "Exhibit A" in each of my responses to the perjurious Declarations submitted by my former attorneys at SNR.

22. "On July 9, 2012, the Court received a letter from Mr. Heslin, dated June 27, 2012, in which he state[d] that SNR attorneys were never 'provided with copies of the e-mails that are allegedly referenced in [Exhibit 31] – and Mr. Rowe provides no evidence to the contrary.' (Heslin Letter of July 9, 2012 at 3.) According to Mr. Heslin, **"the search was conducted by the vendor on its own accord and [SNR] was provided with the results only.**" He also stated that the "only e- mails [SNR] received from defendants pre-dated this list." (emphasis added) [Judge Patterson FRCP 60 Order, 31.] After "Exhibit 31" was presented by me, Mr. Heslin now stated that SNR was "provided with the results only." In a footnote to the letter, Heslin stated to the Judge that the Gary Firm was "involved in all phases of discovery, **including the electronic search of defendants' emails.**" (emphasis added)

23. On November 8, 2012, my FRCP 60 Motion was "denied as based on nothing more than hot air and paranoid suspicions" by Judge Robert P. Patterson in the Southern District of New York. Amongst numerous omissions, there is no mention of the perjurious Declarations of my former attorneys.

24. Specifically, I was only informed on Tuesday, **February 7, 2012** by other attorneys, that plaintiff's own attorneys had committed a series of crimes and gross attorney malpractice in my case. When I was told this, I had no proof at that time. **I only received a copy of the evidence on May 15th, 2012. The actual emails are still concealed by these corrupt attorneys and defendants.**

25. With this damaging evidence presented to Judge Robert P. Patterson, along with their perjurious declarations, Judge Patterson still refused to honor my request for an oral hearing on the matter and denied my FRCP 60 Motion. **A client is always entitled to the work production created by the lawyer or lawyers, while working on a client's case. The lawyer must readily give the client the work production and or files when requested**. For nearly eleven years, Mr. Martin Gold, Mr. Heslin and others at the law firm of SNR/Dentons LLP have refused to honor my request for the hundreds of email documents that rightfully belong to me, Despite their numerous requests for property in which I paid $200,000.00 to obtain, SNR/Dentons LLP and The Gary Firm still refuse to turn over the actual emails to their rightful owner.

ADDITIONAL EXAMPLES OF FRAUD BY THE WILLIAM MORRIS AGENCY AND LOEB & LOEB LLP IN ROWE.

26. Concealing "Exhibit 31/A" and its underlying emails isn't the only example of fraud that occurred throughout my case. Fraud was also committed by the William Morris Agency and Creative Artist Agency during our on-site inspection of their documents. During our inspection – which I was present and actively involved in – we would label all documents that we believed were material to our case so that they could be copied and sent to our attorneys as evidence. We started noticing that the Defendants began removing highly incriminating documents such as the Spice Girls promoter settlement breakdown showing a $70,000 pay out to each white promoter. This demonstrated collusion and supported our claims of anti-trust. Also, they concealed a letter from Cara Lewis – a Jewish music agent at the William Morris Agency that deals predominately with African American artists – to a Jewish-white promoter by the name of Dick Klotzman showing race-based disparate treatment, as well as other evidence that proved our claims against them. This was done to ensure that we did not receive those documents. After we noticed this was occurring, one of our attorneys from the Gary Firm – Laura L. Mall – began manually copying the documents that were viewed by us as highly important on her laptop computer before we would send them down to be copied. This is how we finally caught them in the act of removing and concealing evidence. When our attorneys from the Gray Firm confronted them and we were able to give them precise information about the documents that were missing, and threatened to go to the court, they finally decided to send over to us the documents that they had removed and attempted to conceal.

27. Another example of fraud being perpetrated upon the court occurred after discovery ended in my case. In or around March 2003, Loeb & Loeb LLP presented a taped phone conversation to the court allegedly between Cara Lewis and myself. I was asked by my attorneys from the Willie Gary Law Firm to listen to the recorded conversation to verify its authenticity. Immediately it became obvious that a voice that was clearly not mine had been inserted into the conversation. The strange voice made racial and vulgar statements to say the least. When I informed my attorneys at the Gary Firm of the fraud that I felt had been perpetrated, they decided to send the taped conversation to a forensic scientist – Steve Cain – to see if it had been altered or changed in any manner. Approximately two weeks later, we received a written report from Mr. Cain, in which he stated that the tape had been altered in numerous places and that insertions had been made to the tape as well. The Gary Firm then filed a motion to the court alleging that the tape that was presented was fraudulent and they also submitted the written report from the tape specialist. My attorneys from the Gary Firm also asked the court to order Loeb and Loeb LLP and the William Morris Agency to produce the original tape recording of the conversation in question. The court refused our request during oral argument on June 1, 2003, stating that discovery was now closed. Finally, the court decided to not allow the tape into evidence. This was another attempt to perpetrate fraud upon the court in my case by Michael Zweig, Loeb & Loeb LLP, and the William Morris Agency.

STATEMENT OF FACTS AND CRIMINAL ACTS BY WILLIE GARY

a. Acts of fraud and illegal tampering with evidence, violation of 18 U.S.C. § 1506
b. Conspiracy to interfere with civil rights, violation of 42 U.S.C. §1985(3)
c. Violation of the Racketeer Influence and Corruption Organization Act ("RICO"), 18 U.S.C. § 1961-1968.
d. Violating the Courts e-mail order by allowing the defendants to view the e-mails first and not paying the costs for them.
e. Violating the Organized Crime Control Act ("OCCA").
f. When I reported the email results to you, seen on Ray Heslin's desk, and it was faxed to you by Mr. Heslin, you never demanded that they send over the actual emails. Why? You neglected your fiduciary duty to me, your client.
g. This crucial evidence was comprised of documents from executives of CAA and The William Morris Agency that contained the use of the word "nigger" nearly 400 times.
h. When I reported to you the fraud that occurred, why didn't you act on it and demand for the case to be reopened?
i. Why didn't you inquire about it on behalf of your clients?
j. You, Mr. Gary, began excepting sponsorship money for your annual football classic from Clear Channel while our case was still ongoing.
k. You charged us $20,000 in expenses for each trip you made on your plane without getting our approval for the expenses first.
l. You conspired with others to interfere with our civil rights.
m. You allowed Martin Gold and his law firm Dentons LLP, formerly Sonnenschein, Nath and Rosenthal, to lie to your clients by saying that the email search yielded nothing of use, and you did nothing about it.
n. You and your firm also failed to report this crime which was evidence of civil rights violations to law enforcement and the court neglecting your fiduciary duty to your client.
o. Pages 1 and 17 are missing from the email results that were faxed over from SNR but those pages were faxed to The Gary Firm. The pages contained the biggest number of the word "nigger" being used by the executives at WMA and CAA. Why were these pages missing from the document The Gary Firm submitted to the court at Summary Judgment?
p. Violated New York Judicial Law 487.

CONCLUSION

28. I believe the agency Defendants – The William Morris Agency and Creative Artists Agency – with the help of Michael Zweig, Helen Gavaris, Loeb & Loeb LLP and Weil Gotshal &

Manges LLP financed this entire conspiracy and would have never done so without seeing "Exhibit 31/A," the actual damaging emails, as well as other devastating evidence that proved our claims against them. My attorneys, as well as the Defendants and their counsel, violated a number of federal laws including, but not limited to, the Racketeer Influenced and Corrupt Organizations Act (RICO) as codified 18 U.S.C. §§ 1961 *et seq.*, conspiracy to interfere with civil rights under 42 U.S.C. § 1985, and fraud and illegal tampering of evidence under 18 U.S.C. § 1506. They also committed numerous ethical violations as well pursuant to the New York Rules of Professional Conduct.

29. The conspiracy that has been perpetrated in this case could not have happened without the participation of all parties on both sides. If any of my many attorneys from SNR/Dentons LLP or the Gary Firm had raised an issue with the court about the fraud that had occurred, not only with regards to the concealed emails, but also with other matters, this conspiracy could not have taken place or been successful. All were handsomely rewarded to the tune of millions of dollars, and they all quietly walked away with their riches hoping that this case would never surface again. They did not care about the lives and families they have devastated and destroyed. I have been continuously meeting with the FBI in Washington D.C. and New York demanding that something is done about the awful crimes that have been committed in my case. Like all tax paying American citizens, I am entitled to equal protection under the law without regard to my race and I will not stop pursuing that right, nor will I tire from fighting, until all of these immoral and unethical individuals are brought to justice for the suffering they have caused millions of people

30. I, Leonard Rowe, the undersigned affiant depose and certify that I have written the foregoing with intent and understanding of purpose and believe all statements, allegations and contents herein to be the truth, correct, complete, and just, to the best of my knowledge and belief.

If you consider my position in error, you may rebut with your own affidavit point for point. If not rebutted, this affidavit will be taken as the true bill in commerce. Failure to respond or provide a rebuttal of this affidavit within 10 days of receiving it should constitute a deliberate default and liens will be filed.

Leonard Rowe
Affiant

1/7/2014
Date

Leonard Rowe
5805 States Bridge rd. #119
Johns Creek, GA 30097

1/7/14

PAUL BOIN KIM
NOTARY PUBLIC
GWINNETT COUNTY, GEORGIA
MY COMMISSION EXPIRES DECEMBER 4, 2015