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In Propria Persona

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF KLAMATH
13th JUDICIAL DISTRICT

Kini Cosma) CASE NO:
)
Plaintiff,)
)
vs.) COMPLAINT
)
MONA RICHARDSON,)
GARY RICHARDSON,)
CARROLL L. SPANGLER,)
PATRICIA SPANGLER,)
DOES 1-100 inclusive,)
)
Defendants,)
_____)

Plaintiff was boarding her three wild horses in the back yard of her gay male friend since 2004 while becoming the caretaker of his yard. On Sept. 25, 2007, Plaintiff moved into a room provided by her gay male friend under a conditional agreement.

In February 2008, Plaintiffs' gay male friend passed away. Plaintiff has continued to maintain the assigned yard in an orderly manner. She continued to find trash spewed onto the property by the immediate neighbors, Mona Richardson and Gary Richards, now the Defendants. Carroll L. Spangler and Patricia Spangler are the owners and lease said properties to Defendants.

Sometime during April 2008 Plaintiff confronted Defendants about throwing trash into the yard; not only was it littering but it was hazardous to the horses health and Plaintiff was unable to afford veterinarian bills. Defendants' retorted by telling Plaintiff that they couldn't open the kitchen window because the horse manure odor was ventilating into their residence.

Plaintiff continued to clean, maintain, and muck the yard from horse manure routinely each day while noticing that Defendants had over ten cats for which many of them were living beneath a storage shed maintained by Plaintiff. She also noticed that Defendants' were feeding their cats by throwing food out the kitchen window. Sewage was spilling out of the wall in the same area Defendants were retorting about. In addition, Defendants have two Pit Bulls, a Boxer, and a small house dog.

During the course of the day and while breaking from office duties, Plaintiff trains her horses and seldom sees Defendant(s) cleaning up dog droppings. Further, Plaintiff stock piled their garbage at the front balcony where their many

cats were allowed to tear open the bags and spew garbage all over the vicinity where they complain of.

Plaintiff has not engaged in social activities other than horse related therapy and has limited social involvement. The majority of Plaintiffs' Internet business and menial work related activity has been over shadowed by constant litigation while adjudicating civil liberties, violations of human rights, and activist related intelligence.

Affiliated as a neighbor, Defendant, Mona Richardson, and the Plaintiff had met each other sometime during 2006. Plaintiff set aside a portion of time to be "neighborly" and attended a fireworks party extending into a few neighbor visits after that.

Defendant Mona Richardson who has been frequently drunk, loud and rude with sexual insinuations and accusations, has a son(s), Defendant Gary Richardson who wears baggy pants at mid-butt, flat billed hat on sideways; and tats everywhere while using every other word a profanity; menacing attitude. Plaintiff discovered that Defendant, Gary Richardson, had hostile attitudes toward the gay population. It also appeared Defendants had gang related propensities while engaging in aggressive behavior and baiting someone to challenge them accompanied by, any of various aggravating circumstances; some other indicators of violence.

Sufficient apprehension to curtail Plaintiff's movement and activities restrain, compel or dominate by force or threat were conducted when Defendant, Mona Richardson, offered to take Plaintiff to a social event and then coerced Plaintiff to her boyfriends' home in the country where Defendant intended to interfere substantially with Plaintiff's personal liberty, and without consent or legal authority, was forced to watch them perform sex. Since that time, Defendant had become extremely controlling, constantly making references to Plaintiffs' financial extinctions and has constantly coerced Plaintiff to purchase alcohol, attend drinking establishments, and attend drinking brawls at her residence.

This repeated and unwanted contact has caused the Plaintiff reasonable apprehension regarding her personal safety while Defendants have continued to menace Plaintiff, by word and conduct. On at least two occasions Defendant have recklessly drove vehicles upon or near Plaintiff's premises in a manner that endangers the safety of persons or property.

Plaintiffs' alleged atrocities of the human right violations conducted by the United States Government against her, have limited her to virtually no human exposure. Her identity as a woman has been robbed because of her sexual orientation and the publicity associated with it. Further, Plaintiff has been forced into exclusion while the United States Government operates prospectively to

conduct similar violations of RICO statutes that require a pattern of racketeering conduct.

Under these circumstances alone and the alarming incidents described above, Defendants have caused a reasonable person [especially in Plaintiff's position] to be placed in the requisite state of apprehension and fear.

Defendants intended their expressive conduct to threaten Plaintiff and had the means to carry out that threat knowing that Plaintiff had alleged deprivation of human rights while being unprotected and vulnerable to more economic disaster.

Resulting from the perception of danger, Plaintiff had attempted to, as much as practical, to steer apart, while becoming indifferent, from the immediate vicinity of Defendant neighbors.

Defendant, Mona Richardson, has a reputation or character of acting violently toward people and with the constant implied, implicit, explicit promise of punishment, reprisal, or other distress to charge under pain of punishment warnings about horse manure odor infiltrating into their kitchen window. Defendant gave signs of the approach of something evil or unpleasant would occur.

The atmosphere of the tumultuous and violent conduct including the time of day and defendant's manner of dress, Defendants continue to eyeball Plaintiff's performance by coming into the visual and physical presence, waiting outside their

home, making threatening gestures while under the circumstances conveyed to Plaintiff the intention of Defendant's immediately use of physical force.

Extreme attempts to place Plaintiff under Defendant's control while constantly intimidating her with degrading insults, epithets and insolent verbal statements were made by Defendants in veiled declarations of intent, made in the conditional tense, indicating the theoretical possibilities of controlling Plaintiffs' finances conveying to Plaintiff the idea that such assaults were immediately forthcoming and impending.

Within the realm of theoretical possibility signifies a gravity of purpose that the danger the message [would] be followed by action was objectively probable as well. The utterances in retaliation for "horse manure odor" were statements of intent concluding to Plaintiff the immediate resort to physical force unless she did not comply with Defendants implied demands to forfeiture of Plaintiff's personal property.

The final incident took place on or about August 21, 2008. Plaintiff confronted Defendants about carpet fibers thrown from the Defendants' back balcony. Defendants called the Klamath Falls Sheriff's Department to report the horse manure nuisance. Despite knowing that Defendant's contacts were unwanted and repeated, Defendants had intentionally, knowingly and recklessly engaged in

repeated and unwanted contact with Plaintiff, thereby alarming Plaintiff, that it was objectively reasonable for Plaintiff to be alarmed.

Further, Defendants had the requisite intent for their objective nature of their tumultuous statements, in that such statements were such an attempt had indicated impending to announce as intended, recklessly endangering Plaintiff.

Defendants intentionally attempted to place Plaintiff in fear of imminent serious physical injury while Plaintiff has been training her wild horse on the assigned grounds while constantly having to take evasive action to avoid a collision.

From the facts of this case, Plaintiff places heavy reliance, between an explicit and an implicit announcement of a threat. Defendant's implied nature and relation to another announces that a person's welfare is in danger, explicit with an expression of an intention to inflict harm or loss on Plaintiff by Defendant's demands to provide some kind of financial gain or else he would immediately use physical force on Plaintiff to compel her to suffer more economic depressions.

Defendant has committed several acts that, alternatively, constituted evidence of a single element--recklessness--menaced by expressing past thoughts by linking them in some way to proposed future conduct intended to inflict bodily harm upon and to unnecessarily expose Plaintiff to danger ready to take place: near

at hand: impending: hanging threateningly over her head: menacingly near in the intentional attempt to place Plaintiff in fear.

Plaintiff contends that an expression of an intention to inflict evil, injury, or damage on another as retribution or punishment for something done or left undone are expressions of an intention to inflict loss or harm on another by illegal means and by means involving coercion or duress of the person threatened ([threats]. Plaintiff contends inducing fear of bodily harm are often caused of legal action even in the absence of overt violence something that by its very nature or relation to another threatens the welfare of the latter.

The injuries that were rendered, or the punishment, physical punishment that was inflicted here, for the intent of preventing or overcoming resistance to the taking of property or compelling the person to deliver property truly qualifies for circumstances manifesting extreme indifference to the value of human life.

Enumerating each of the supporting aggravating factors, these threats have been made by Defendant, Mona Richardson, and through the youthful mischief of Defendant, Gary Richardson, who with a purported certainty to become even with or gain an advantage over Plaintiff was intended to express a true intention to inflict bodily harm knowingly and willfully with the immediacy, and gravity of purpose necessary to remove it from the free speech protections of the state and federal constitutions.

In light of the foregoing, this Plaintiff requests that this court grant Plaintiff:

1. Costs and disbursements for loss of property, time, aggravated emotional battering, enhanced anxiety, aggravated pain and suffering, menacing of Plaintiff's security dog, veterinarian bills or any other equine related costs, prospective future restraining order, and whatever this Court finds appropriate.

I, Kini Cosma, hereby declare under penalty of perjury the foregoing is true and correct.

Kini Cosma, Plaintiff

Dated: September 1, 2008