

IN THE CIRCUIT COURT, 19TH
JUDICIAL CIRCUIT, IN AND FOR
MARTIN COUNTY, FLORIDA

CASE NO.: 25-103CA
DIVISION:

JAMES TODD WAGNER
Plaintiffs,

vs.

WARREN B. MOSLER, AVM, L.P, and III CAPITAL MANAGEMENT
Defendants.

**BRIBERY AND RACKETEERING INFLUENCED AND CORRUPT
ORGANIZATION COMPLAINT**

JURISDICTION AND VENUE

1. Plaintiff, James Todd Wagner ('JAMES'), is a resident of Martin County, Florida, the damages have accrued and continue to accrue against JAMES while he is a resident of Martin County, and is otherwise sui juris.
2. Florida Circuit Court is an appropriate venue, as the majority of the wrongdoings in this lawsuit were conducted by a pair of large, private financial institutions, Plaintiff has been a resident of Florida since 2004, and the amount of damages exceeds \$75,000.
3. Plaintiff, James Todd Wagner files this lawsuit pro se.
4. Defendant Warren B. Mosler ('MOSLER') resides at 84 Shoys, Christiansted, St. Croix, USVI and routinely conducts business in Florida, and is otherwise sui juris.

5. Defendant, AVM, L.P. (previously Adams, Viner, and Mosler, L.P.) ('AVM') was founded in 1982 by MOSLER, and is located at 777 Yamato Road Boca Raton, Florida 33431.
6. Defendant, III Capital Management ('III-CM') was founded in 1982 by MOSLER, and is located at 777 Yamato Road Boca Raton, Florida 33431.

STATEMENT OF THE CASE

This is a Racketeering Influenced and Corrupt Organization ('RICO') complaint includes 18 RICO-allowed illicit acts over a span of 12 years. The most recent illicit act was bribing a 15th Circuit Court Judge, Luis Delgado, for the purpose of escaping from a likely \$300,000,000+ judgement inclusive of Punitive Damages. Warren B. Mosler is considered the "Godfather of Modern Monetary Theory" ('MMT'), and his theories were embraced by Leftist governments around the world leading to MOSLER's opportunity for insider information at the United States Federal Reserve ('FED') and other sovereign-monetary-institutions. The insider information is used for illegal insider trading with MOSLER's \$57,000,000,000 Hedge Fund, III-CM.

In addition to the two Predicate Acts already mentioned, this Complaint provides Notice-of and Proof-of an additional 16 Predicate Acts (at least 14 of which are considered felonies) including Perjury, Theft, Insurance Fraud, Intentional Pollution, and Tax Evasion. The pattern of illicit acts executed by MOSLER, AVM, and III-CM all include MOSLER as the orchestrator. The illicit acts were executed for profit and pleasure.

PARTIES

7. AVM is a private Broker-Dealer trading mostly in fixed-income and derivatives thereof; AVM serves as a marketing arm of III-CM per SEC filings.

8. III-CM has over \$57,000,000,000 [57 Billion] under management; SEC document admitted into 15th Circuit Court Hearing; attached as **Exhibit “A”**.
9. MOSLER contracted with JAMES’s company, Supercar Engineering, Inc, (‘SEI’) to provide ‘Director of Engineering’ services to MOSLER’s wholly-owned Supercar Company, Mosler Auto Care Center, Inc. (‘MACC’).
10. MACC, D/B/A “Mosler Automotive”, produced mostly-illegal-to-sell carbon-fiber chassis Supercars; reference images of Mosler Products by model year follows:

a. 2004 MT900S



b. 2009 MT900S



c. MOSLER-Claimed 2010 & 2011 Photon



d. 2012 Mosler RaptorGTR



e. Mosler MT900R race car



11. MOSLER moved from Florida to St. Croix United States Virgin Islands ('ST-CROIX') in 2003, and now resides in ST-CROIX; enjoying the tax-haven element paying 03.5% Federal Tax on MOSLER's income from AVM and III-CM.
12. AVM and III-CM have been located in Boca Raton, Florida at all times relevant to this RICO action.
13. JAMES graduated from Virginia Tech in Mechanical Engineering and earned a MBA from Yale University before MOSLER asked JAMES to provide "Director of Engineering" services to MACC via a wholly-owned S-Corporation.
14. The S-Corporation that JAMES founded in January 2004 is Supercar Engineering, Inc. ('SEI'); per MOSLER's direction, MACC contracted with SEI to perform the "Director of Engineering" duties for MACC.
15. MOSLER was the president, co-officer, and 100% owner of MACC; now dissolved.
16. Racketeering Influenced and Corrupt Organizations Law ('RICO') has tolling standards in the state of Florida for Defendants who are out of the state of Florida; Plaintiffs claim the full 3-years of tolling on the Statute of Limitations for Florida RICO due to MOSLER.

FACTUAL ALLIGATIONS

17. Exhibit "A" indicates that MOSLER has been given ample capital to bribe a judge.
18. Relevant to Statute of Limitations, MOSLER actively withheld 18,500 pages of evidence, committed perjury, and induced his co-officer of MACC to commit perjury **for the purpose of concealing racketeering activities** up until July 2019; please see Exhibit "P" on Defendants' efforts to conceal evidence.

19. Abbreviated timeline of events leading to Bribery of a Circuit Court Judge follows:

- a. May 2011: MOSLER offered 3-months of purchase exclusivity and deposit refundability for a \$100,000 deposit for the purchase of MACC.
- b. June 2011: JAMES was thus induced to wire \$100,000 direct to MOSLER.
- c. August 2011: EPA approves Certificate of Conformity for 2012 Mosler RaptorGTR, 838hp Supercar.
- d. August 2011: MOSLER secretly sends RaptorGTR EPA documents to other potential MACC buyers (violating JAMES's exclusivity).
- e. September 2011: MOSLER and his friend, Savvas Savopoulos, scheme to "Terminate Todd" and take SEI's Intellectual Property and Distributorships.
- f. November 2011: MOSLER makes false statements to numerous automotive journalists, leading the journalists to conclude that "SEI's 2012 Mosler RaptorGTR is a fake and JAMES is a con man" [paraphrased].
- g. December 2011: MOSLER trains his son how to fraudulently-induce a second person to submit a "Good Faith Deposit".
- h. 2012: JAMES sues MOSLER for return of \$100,000 deposit and numerous other issues.
- i. 2014: JAMES receives numerous lawsuit-replies from MOSLER indicating "no documents exist".
- j. 2016: Judge Hafele ruled that Count-IX defamation including MOSLER's statement to a Car and Driver journalist regarding JAMES, "He's nothing. He has serious mental problems...." was eligible for punitive damages.

- k. 2018: MOSLER's co-officer and Vice President of Global Operations, Jill Wagner, testifies in a Spoliation Hearing persuading Judge Hafele that the sought documents do not exist.
- l. May 2019: MOSLER's personal attorney cracks upon of having his personal computer searched and admits responsive documents exist and were sent to MOSLER "Years ago."
- m. 3-Weeks-Later June 2019: 18,500+ pages of previously-withheld email documents were provided by MOSLER to Plaintiffs.
- n. 2021: Upon extensive searching and categorizing of the Spoliated evidence, **JAMES discovers proof of Fraudulent Inducement**.
- o. 2021: JAMES discovers in the 7'-high-stack of Evidence **multiple nearly-identical written examples** of the Count-IX ('Defamation Per Se') punitive-damages statements that MOSLER wrote to JAMES's potential business partners.
- p. January 2023 (prior to bribery): MOSLER loses his 5th and final attempt to have the court knock out the Count-IX Defamation via a Motion for Summary Judgement; Defendants' MSJ included deceptions of the Court.
- q. Est. February – March 2023: Multi-billionaire, MOSLER bribed Florida's 15th Circuit Court Judge, Luis Delgado.
- r. April 2023: Judge Luis Delgado excluded JAMES's critical accounting expert-witness, Cinamin O'Shell.
- s. May 9, 2023: Trial Begins; Judge Delgado allows Defendants' to control the Verdict Form, which is 32-pages long and contains mental traps.

- t. End-of-Day May 23, 2023: Plaintiffs rest having presented the previously-Spoliated written reinforcement of MOSLER's verbal defamation, and the MOSLER's second "Good Faith Deposit Scam" totaling 119 exhibits (117 exhibits admitted without objection) and 1840 pages of sworn testimony transcript from 8 witnesses including the following about MOSLER's **two fraudulent inducements** (one of which took \$100,000 from JAMES):

2 A This is the same --

3 Q The same con?

4 A -- deposit con, and Mr. Mosler and Lew Lee
5 conspired together to run against me.

6 Q Do you think it's a problem having your
7 father --

i. 8 A This is **fraudulent inducement.**

- u. End-of-Day May 23, 2023: Defendants present a 32-page-long 'Motion for Directed Verdict'; Judge Delgado refuses Plaintiffs objection and request to have overnight to prepare a response.
- v. 45-mintues-later May 23, 2023: Judge Delgado **removes from the jury** from Count-IV '**Fraudulent Inducement**', Count-III 'Exclusive Distributorships' (over \$100M in damages), and Count-IX Defamation with Punitive Damages (10% of MOSLER's net worth equates to over \$200M).
- w. May 26, 2023: Jury is only allowed to rule on 4% of the potential value of the lawsuit; Jury delivers a Verdict in favor of Plaintiffs on all categories.
- x. May 26, 2023: Jury's Verdict totaled \$850,000, which would add up to approximately \$1,800,000 inclusive of 13 years of statutory interest and attorney's fees.

- y. May 26, 2023 (immediately after Jury Verdict reading): Judge Luis Delgado per Defendants' verbal Judgement Notwithstanding the Verdict eliminates jury verdicts regarding the \$100,000 deposit.
 - i. Judge Delgado **had already taken from the jury** the **Fraudulent Inducement** claim regarding the \$100,000 deposit mid-trial.
 - ii. MOSLER could lose his Hedge Fund financial license if a Final Verdict including an element of fraud were entered.
 - z. May 6, 2024 (one year after trial): Upon MOSLER's 2nd JNOV, Judge Delgado issues "Final Orders" eliminating \$816,101 of the jury's \$850,000 verdict [D.E. 868 and 869 for 2012-LAWSUIT].
 - aa. November 6, 2024: After being informed that a 'Statistical Process Control' analysis of his 22 prior claims of "no evidence" could only happen once every 37,000,000 years within an "in-control" judicial system, ***Judge Delgado slips-up and admits that evidence does exist***, but that he is still removing 100% the jury's role in justice and eliminating the final \$33,894 of award that he hadn't yet disposed of.
 - bb. December 13, 2024 (18-months after trial): Upon MOSLER's 3rd JNOV Judge Delgado issues "Final Judgement" eliminating 100% of the jury's \$850,000 verdict in all the four-categories that Judge Delgado hadn't already removed from the jury mid-trial; leaving Plaintiffs with **\$0**.
 - cc. January 10, 2025: MOSLER files a Motion to force JAMES to pay MOSLER's attorney's fees, which are estimated at \$2,000,000.
20. Juries were formalized hundreds of years ago to combat Judicial Bribery.

21. The United States Constitution 7th Amendment: *“In Suits at common law, where the value in controversy shall exceed twenty dollars, **the right of trial by jury shall be preserved, and no fact tried by a jury, shall be otherwise re-examined** in any Court of the United States, than according to the rules of the common law.”*
22. The Florida Constitution Article I Section 22 enshrines the right to a jury trial:
*Trial by jury.—**The right of trial by jury shall be secure to all and remain inviolate.** The qualifications and the number of jurors, not fewer than six, shall be fixed by law.*
23. Judge Delgado circumvented jury-protection via eliminating the jury.
24. Judge Delgado eliminated the jury via the false claim that within the 2661 pages of sworn testimony and 259 exhibits admitted into evidence (over 3500 pages in total) *“there is no evidence nor inference in a light most favorable to Plaintiffs.”*
25. Some judges in the United States of America accept bribes.
26. Some judges in Florida accept bribes, particularly in relation to human trafficking.
27. MOSLER with the financial backing and human resources of AVM and III-CM have the **Means, Motive, and Opportunity** to bribe a Circuit Court Judge, Luis Delgado, and participate in numerous other felonies as described below.
28. The nine of the felonies in addition to judicial bribery are: Blackmail, Extortion, Perjury, Inducing Perjury in Subordinates, Intentional Violation of Federal Clean Air Laws, Insurance Fraud, Wire Fraud, Tax Evasion, and Insider Trading of United States Treasury Securities.
29. Defendants’ felonies were each executed for a profit motive.

30. Judicial Bribery was the most recent felony, which was executed when it became clear that MOSLER was going to lose a \$300,000,000+ civil lawsuit that included many of the other felonies plus defamation, trade libel, and breach of contract.
31. AVM and III-CM have been MOSLER's primary source of income for 30+ years.
32. MOSLER keeps the vast majority of his wealth in the III-CM Hedge Fund.
33. MOSLER was aware that he was sued and furthermore liable for **Punitive Damages in Florida Circuit Court since 2016**; any attempts MOSLER made to hide assets in Trusts and other devices designed to frustrate creditors are invalid with respect to JAMES's claims and this RICO action.
34. Bribery of a Circuit Court Judge was a necessary action for MOSLER to escape from a "Fraudulent Inducement" Final Judgement for making-an-offer-of-refundability thereby inducing JAMES to provide a \$100,000 deposit.
35. Bribery of Public Officials is done in secret by wealthy entities and elites.
36. Bribery is frequently conducted with modern means such as untraceable cryptocurrencies; thereby **most parties to bribery believe that this form of corruption can be conducted with impunity.**
37. A path to creating a proof-set that a jury would discern proved Bribery by "clear and convincing evidence" in a Civil lawsuit or "beyond a reasonable doubt" in a Criminal lawsuit is via use of Statistical Process Control to evaluate if the SERIES of judicial actions could be random-chance or an orchestrated sequence designed to benefit the person/entity delivering the bribe.
38. This RICO lawsuit presents Statistical Process Control analysis under the identifier 'JudgeX' to illustrate how often a set judicial actions would occur happen outside of a bribed condition.

39. For reference, Statistical Process Control has been in used in numerous industries for decades after being first adopted by Toyota; resulting in a consistent level of high-quality outputs from Toyota.

40. The Judicial System must produce consistent, high-quality outputs.

41. Plaintiff worked for AVM for approximately 5 months, and is providing Affidavits of his direct knowledge of the operations of AVM.

42. Plaintiff's work for AVM was partly to benefit III-CM via booking trades for III-CM, which trades in US-TREAS among other fixed-income securities.

43. AVM has insider access to the United States Federal Reserve through MOSLER's influence and MOSLER's promotion of "Modern Monetary Theory".

44. MOSLER has provided sworn testimony about his access to the decision-makers inside the United States Federal Reserve within a trial that occurred in May 2023 ('2023-TRIAL').

45. It is within the 2023-TRIAL that MOSLER volunteered at the prompting of his attorney, Steven Weber, that MOSLER benefitted from "Private" and "Confidential" meetings with the United States Federal Reserve.

46. This MOSLER testimony reinforced Plaintiff's understanding that AVM and III-CM were benefitting from illegal Insider Information regarding United States Treasuries.

47. The 2023-TRIAL was pursuant to a lawsuit filed in 2012 ('2012-LAWSUIT') featuring the Florida Civil Court Number 50-2012-CA-023358-XXXX-MB AG.

48. Some of Plaintiffs' 119 admitted exhibits in the 2023-TRIAL will be included as Exhibits to this 2025-LAWSUIT; shorthand of Plaintiffs' Exhibit #XX is PL#XX.

49. **Compound Exhibit “B”** is an Affidavit of James Todd Wagner on the topic of AVM and III-CM Insider Trading in United States Treasury Securities with references to sworn testimony from the 2023-TRIAL by JAMES and MOSLER.
50. Compound Exhibit “B” contains ‘Clear and Convincing Evidence’ of the Defendants conducting Insider Trading in United States Treasuries (‘US-TREAS’).
51. Insider trading in US-TREAS is an operation of theft of money from United States citizens, which is a Predicate Act to RICO per **Florida Statute § 812.014**.
52. JAMES is a citizen of the United States of America.
53. Proof of 17 additional Predicate Acts were gathered via employment with the enterprises and prosecution of issues in the 2012-LAWSUIT, including:
- a. Blackmail per Florida Statute § 836.05
 - b. Extortion per Florida Statute § 836.05
 - c. Fraudulent Inducement per Florida Statutes § 817.40 - 817.40 and § 817.061.
 - d. Theft of \$100,000 per Florida Statute § 812.014.
 - e. Theft of Intellectual Property per Florida Statute § 812.014.
 - f. Theft via Tax Evasion per Florida Statute § 812.014.
 - g. Perjury via verbal sworn testimony per Florida Statutes § 895.02(1)(s), § 817.29, § 817.02, and § 817.012.

- h. Perjury via written declaration including affidavit per Florida Statutes § 895.02(1)(s) and § 817.021.
- i. Inducing Perjury in paid employees per Florida Statutes § 895.02(1)(s) and § 837.05.
- j. Obstruction of Justice via Spoliation of 18,500 pages of Evidence for over 5 years per Florida Statutes § 817.034, § 817.29, and § 918.13.
- k. Trade-Libel to take Intellectual Property per Florida Statutes § 817.034.
- l. Trade-Libel to take vehicle sale profits per Florida Statutes § 817.034.
- m. Changing the Vehicle Identification Number on the 2012 Mosler RaptorGTR to a 2009 Mosler MT900S per Florida Statute § 817.235.
- n. Constructing 'Supercar' vehicles illegally with excessively-polluting emissions-control equipment per Florida Statute § 403.727(3)(b).
- o. Insurance Fraud per Florida Statutes § 817.233 and § 817.234.
- p. Use of investment or racketeering income per Florida Statute § 895.03.
- q. Intentionally-uncontrolled trading to facilitate money laundering per Florida Statute § 655.50.
- r. Bribery of a Circuit Court Judge per Florida Statutes §895.02(1)(a), § 838.015 and § 838.016.

54. MOSLER and enterprises founded by MOSLER executed the illicit activities for a **profit motive.**

55. Some of the illicit activities were executed for a malice motive.

56. Some of the illicit activities were executed for a pleasure motive.
57. MOSLER intentionally damaged JAMES's business of marketing and selling Supercars through SEI.
58. MOSLER's intentional damage to JAMES's business, SEI, was via Trade Libel that MOSLER orchestrated and executed for the purpose of unethically-taking SEI's Intellectual Property and Exclusive Distributorships for Mosler Products.
59. MOSLER's Trade Libel against SEI was malicious and additionally intended to financially ruin JAMES for the benefit of MOSLER's pleasure.
60. MOSLER has been presented numerous opportunities to mitigate the damage to SEI, and MOSLER has steadfastly refused to mitigate any of the damage that MOSLER did to SEI.
61. MOSLER's most-recent Notice of the damage done to SEI was in May 2023.
62. Evidence of MOSLER's Trade Libel is contained in several of the exhibits to this complaint, and the 2023-TRIAL Verdict Form wherein the jury delivered \$350,000 of damages to JAMES for MOSLER's Trade Libel (see also Exhibits "L" and "M").
63. MOSLER has similarly executed Defamation against JAMES; and similarly refused to perform any mitigation of the intention damage to JAMES.
64. Evidence of MOSLER's Defamation is contained in several of the exhibits to this complaint, and the 2023-TRIAL Defamation wherein the jury delivered \$250,000 of damages to JAMES for MOSLER's Defamation (see also Exhibits "L" and "M").
65. Per MOSLER's request to Judge Luis Delgado, the two most valuable elements of the 2012-LAWSUIT tried in the 2023-TRIAL were removed Verdict Form.
66. MOSLER damaged JAMES's business, SEI, in quantifiable way.

67. MOSLER contractually-obligated his wholly-owned company, MACC, to **build a minimum** of 3 vehicles per year for SEI.
68. MOSLER instructed MACC to not build the contractually-obligated 3-vehicles-per year and further gave away the 3 used finished vehicles to take them out of SEI's reach.
69. MOSLER directed the 3-finished-vehicles to instead be gifted to his son and AVM/III-CM principals a part of the Tax Evasion activities of Defendants.
70. Sworn testimony that was admitted without objection in the 2023-TRIAL indicates that SEI would have earned \$400,000 per Mosler-Vehicle in profit.
71. The contractual term of SEI's Exclusive Distributorship is 25-years.
72. Therefore the quantifiable damages from MOSLER's Trade Libel is \$400,000 profit per vehicle x 3 vehicle-minimum x 25 years = \$30,000,000 as a minimum.
73. As a business owner and marketer of Mosler Products for years, JAMES performed a net present value of the most-likely outcome of each of SEI's 25-Year Exclusive Distributorships; the Net Present Value of this analysis is
74. MOSLER signed two of the 25-year Exclusive Distributorships of Mosler Products, but SEI only sued over one of the two Exclusive Distributorships in Mosler Products; the Exclusive Distributorships of Mosler Products in China and Thailand ('DISTRIB-China').
75. The second Exclusive Distributorship, which was not sued-upon was 'Exclusive Distributorship of Mosler Products in United Arab Emirates and Saudi Arabia' ('DISTRIB-UAE').
76. The Exclusive Distributorships, business analysis of SEI's profit from selling Mosler Products, non-exhaustive set of sworn testimony on the topic DISTRIB-

China and MOSLER's Trade Libel against SEI relating to its distributorships is included in **Exhibit "T"**.

77. MOSLER requested that Judge Luis Delgado declare that all of the data included in Exhibit "T" was **"no evidence nor inference in a light most favorable to Plaintiffs whereby the jury could rule in favor of Plaintiffs"**; Judge Luis Delgado complied with MOSLER's request.

78. MOSLER bribed Judge Luis Delgado to make the false-judicial-claim that within the 3500+ pages of evidence, there is "no evidence".

79. Having lost \$55,000,000 on MACC and no other means of recouping that loss, outside of money from AVM and III-CM; MOSLER had no financial capability to bribe Judge Luis Delgado.

80. The enterprise of AVM was created by MOSLER to deliver money to MOSLER.

81. The enterprise of III-CM was created by MOSLER to deliver money to MOSLER.

82. Defendant, Warren B. Mosler bribed Judge Luis Delgado using money provided by Defendants AVM and III-CM.

83. The pattern of racketeering activities is interconnected via the Predicate Acts all involving Warren B. Mosler as the principal orchestrator of the illicit activities and founder/equity-owner of the racketeering entities, AVM and III-CM.

84. The pattern of racketeering activities is interconnected via JAMES being a direct victim of most of the illicit activities.

85. JAMES understands that Florida RICO Law mirrors Federal RICO Law, which does not require that all of the RICO elements directly impacted the victim of the racketeering enterprise.
86. JAMES has expressed desire to **blow-the-whistle** on some of the Predicate Acts including construction of illegal supercars and insurance fraud; resulting in **retaliation by MOSLER.**
87. Between January 1, 2023 and May 15, 2023; MOSLER bribed Palm Beach County Circuit Court Judge Luis Delgado for the first time; this time span is based upon analysis of external actions including the immense shift in Judicial-Outputs from Judge Delgado.
88. Provided Defendants don't withhold discovery (as MOSLER did for 5 years in the 2012-LAWSUIT), discovery will determine when the first bribe of Judge Luis Delgado was delivered, and the bribe may have been in the form of untraceable cryptocurrency.
89. MOSLER founded multiple global financial services companies, and is therefore aware of how to successfully hide a bribe to a judge among many of the thousands of offshore banks that MOSLER interacts with in the normal course of his business dealings.
90. Videographic evidence of MOSLER handing a check with the words "BRIBE" in the memo field to Judge Luis Delgado it is not required for a jury to discern that via 'Clear and Convincing Evidence' that MOSLER bribed a judge.
91. Judge Luis Delgado continued **gifting outrageous, contrary-to-law rulings** to Warren B. Mosler for the preceding 18 months since trial concluded with the most-recent such outrageous ruling occurring on November 6, 2024.

92. The 2023-TRIAL began with jury selection on May 9, 2023; and concluded on May 26, 2023.
93. Detailed data regarding the 2023-TRIAL including dates of events, trial testimony, and trial exhibits in evidence can be found on <https://WarrenMosler.co>.
94. Plaintiff, JAMES, does some volunteering for victims of Human Trafficking specifically in the area of ensuring the less-than-1% of little girls who survive [are not killed for pleasure or harvested for her organs] get a fair trial.
95. JAMES's work to prohibit Judicial Bribery in Human Trafficking cases includes leveraging JAMES's Yale School of Management expertise to adapt the decades-old Statistical Process Control Methodology to the Judicial realm; **JudgeX.org**.
96. The common-denominator in judicial-bribery is that the person DELIVERING-THE-BRIBE must be wealthy enough to afford the payment; MOSLER's immense wealth and capability to bribe comes from AVM and III-CM.
97. A JudgeX analysis of the 2012 JAMES/SEI v MOSLER/MACC case, confirms beyond a reasonable doubt that Judge Luis Delgado received at least one bribe from MOSLER and/or an intermediary entity such as Steven Weber; ultimately the bribe funding originated within AVM and III-CM.
98. **Modern bribery is ostensibly untraceable** as criminals have invented numerous ways to disguise the bribe; and when necessary criminals deliver bribes via one of many cryptocurrencies that are designed to be untraceable.
99. The JudgeX analysis of the series of judicial actions in the 2023-TRIAL, which is in the public record, is attached to this Complaint as "**Exhibit-C**."

100. Data in Exhibit “B” indicates that via ‘Clear and Convincing Evidence’ MOSLER bribed Judge Luis Delgado.
101. **Given that MOSLER lost \$55,000,000 [\$55 million] in MACC, the only way MOSLER could have bribed Judge Luis Delgado is via AVM and/or III-CM providing funding for the bribe; see Exhibit “D” for evidence of MOSLER’s \$55 million loss in his hobby Supercar company, MACC.**
102. In preparation for the 2023-TRIAL, Plaintiffs attempted to get legal depositions from AVM and III-CM principals, Robert Printz and Michael Reger, on the topics of the illegally-build vehicles they purchased from MACC and the MOSLER’s net-worth which MOSLER identified under penalty of perjury to be between (est) \$89,999,999 and \$110,000,001.
103. MOSLER had been under Court-Order to provide his net worth information since 2016; and only provided it on the eve of trial in 2023.
104. MOSLER was under Court-Order to provide his net worth information because net worth of the perpetrator is part of the 2023-TRIAL Jury’s evaluation of Punitive Damages for the Defamation of JAMES [“Todd” pre-defamation].
105. MOSLER’s defamation of JAMES was intended to financially ruin JAMES, such that JAMES would instruct his company, SEI, to surrender SEI’s Intellectual Property regarding the 2012 Mosler RaptorGTR and also surrender SEI’s two 25-Year Exclusive Distributorship contracts.
106. In attempt to prove that MOSLER had committed Perjury to the Court for the Defamation with punitive damages aspect of the 2012-LAWSUIT, Plaintiffs properly served Robert Printz and Michael Reger with deposition subpoenas.
107. Robert Printz and Michael Reger evaded deposition via “lawyering-up” and generating delay tactics that extended through the start of the 2023-TRIAL.

108. The delay tactics by Robert Printz and Michael Reger allowed MOSLER to evade detection of having lied under oath in relation to the 2023-TRIAL.

109. MOSLER's true net worth is be over \$2,000,000,000; given the accumulated income from AVM and III-CM and a reasonable Net Present Value of MOSLER's 10% equity ownership in each of AVM and III-CM; MOSLER may have received a \$44,000,000 buyout of his equity in AVM in 2017.

110. MOSLER committed perjury by providing an Affidavit to the Court that his net worth was 1/20 of his actual net worth.

111. If MOSLER did receive the \$44,000,000 buyout, then MOSLER directly lied about this payout twice under sworn deposition in 2020; MOSLER was under Court-Order to provide his financial information at the time of this likely-perjury.

WARREN MOSLER
JAMES TODD WAGNER vs WARREN MOSLER

August 19, 2020
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1 Q. When did you cease being a partner at AVM?

2 A. Formally, about three years ago.

3 Q. Was there any sort of a buyout or anything?

a. 4 A. No.

112. MOSLER's prior sworn testimony in 2016 indicated his 10% equity stake in each of AVM and III-CM **enterprises; Exhibit "E"**.

113. MOSLER swore under oath that he received \$0 for his 10% equity stake I AVM, which was founded by MOSLER (see last page of Exhibit "E").

114. MOSLER was likely thinking that had received sufficient capital from AVM and III Capital Management to afford a large bribe.

115. MOSLER was likely thinking sufficient incentive to deliver a large bribe existed because MOSLER was guilty of numerous profit-motivated wrongdoings and punitive damages is commonly at 10% or more of the wrongdoer's net worth.
116. MOSLER was likely thinking that MOSLER needed his financial partners, Robert Printz and Michael Reger, to help MOSLER hide MOSLER's true net worth from the jury.
117. It is reasonable to assume that MOSLER's partners, AVM and III-CM principals, were aware of MOSLER's intentional sworn mis-statements; and therefore Robert Printz and Michael Reger chose the path of evading deposition to protect their founding partner from exposure to criminal prosecution for perjury.
118. MOSLER provided an 8-page 'Termination and Release' document, PL#80, to JAMES for the purpose of attempting to take JAMES's assets under the threat of financial annihilation.
119. MOSLER's attacks on SEI's property, 2012 Mosler RaptorGTR is Trade Libel.
120. The inherently foolish attempt by MOSLER to ruin JAMES reputation and SEI's 2012 Mosler RaptorGTR's reputation as an 'Official Mosler Vehicle', while simultaneously attempting to preserve the value of the RaptorGTR for himself [MOSLER] is illogical, but nonetheless true.
121. MOSLER hid over 18,500 pages key evidence in the 2023-TRIAL for over 5 years, and Plaintiff expects that AVM and III-CM will attempt the same frustration of justice; therefore it will be important for an independent auditor to search the email servers of AMV and III-CM to discern if any evidence has been destroyed.

122. During the 2023-TRIAL, multiple witnesses provided sworn testimony about MOSLER's Blackmail, Extortion, Insurance Fraud, Violation of Federal Clean Air Laws, Defamation, Trade Libel, Insider Trading, Perjury, Tax Evasion, and serial scamming people out of "*Good Faith Deposits*".
123. Details of unethical and likely-criminal activities listed in Paragraph 123 are explained detail in Paragraphs 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 141, 142, 143, 144, 145, 146, 147, 148, 149, and on *warrenmosler.co*.
124. MOSLER's **Blackmail** of JAMES and SEI was to threaten a "Buyer Beware" Notice on the MoslerAuto.com website to formally dissuade potential buyers from purchasing the 2012 Mosler RaptorGTR #001 UNLESS SEI allowed MOSLER to take possession of it for MOSLER's secret plan to financially crush JAMES for the profit motive of forcing a state of desperation on JAMES so that he would surrender his Intellectual Property and Exclusive Distributorships to avoid more suffering; derivatives of this forcing-desperation-tactic are used on little girls who have been sold into the sex trade to obtain surrender.
125. MOSLER's **Extortion** of JAMES and SEI was to refuse to return SEI's \$700,000 property unless JAMES signed a "ACKNOWLEDGEMENT" that the 2012 Mosler RaptorGTR was not actually a RaptorGTR, but was instead a 2009 MT900 with no-warranty; the extortion was amplified by threat to charge \$35/day in "storage fees" until JAMES complied then refusing to sell SEI replacement side glass until JAMES complied.
126. MOSLER's **Insurance Fraud** participation was primarily in helping hide his attorney's \$220,000 fleecing including refusing to inform the insurer who had reached out to MACC via a letter that continues to be withheld from Plaintiffs that the vehicle was a) built illegally and not valid for use on public roads b) had a well-known and documented fire-risk from a manufacturer-defect that MOSLER ***refused to recall until immediately after Alan Simon received***

his fraudulent \$220,000 payout; much more on this including hiding evidence from JAMES (who wished to blow the whistle) until the 5-year statute of limitations for fraud expired is published on WarrenMosler.co.

127. MOSLER supported the **Insurance Fraud** via agreeing to strip JAMES [JAMES's Company] off of the MoslerAuto.com website as a contact for sales after it became known that JAMES refused to comply with Alan Simon's insurance fraud payout pump-up scheme, which would have netted Mr. Simon an additional \$130,000 of fraud on the shareholders of the Insurance Company.
128. MOSLER's **Violation of Federal Clean Air Laws for 2004-spec MT900S** vehicles is instructing MACC to build 2004-spec MT900 vehicles from 2006 (first delivery to George Lucas) through 2008 (for Alan Simon, Robert Printz and many other customers) in direct violation of federal law that MOSLER grudgingly agreed was illegal during the 2023-TRIAL; in addition not building the 2004-spec vehicles with the General-Motors catalyst that was used to obtain the test data submitted to the U.S. government, but instead with ultralight, "high flow" catalysts after long-tube (also illegal) headers.
129. MOSLER's **Violation of Federal Clean Air Laws for 2009-spec MT900S** vehicles is instructing MACC to build 2009-spec MT900 vehicles from 2010 (first delivery to Scott Ramsey, a AVM/III trading partner) through 2011 in direct violation of federal law that MOSLER grudgingly agreed was illegal during the 2023-TRIAL; in addition not building the 2009-spec vehicles with the General-Motors catalyst that was used to obtain the test data submitted to the U.S. government, but instead with ultralight, "high flow" catalysts after long-tube (also illegal) headers; in addition one 2009-spec vehicle for III-principal, Michael Reger, was built with the ultralight catalysts and twin-turbos from the factory – obviously illegal.

130. MOSLER's ***Violation of Federal Clean Air Laws ENDED*** at the 2012 Mosler RaptorGTR, because JAMES and SEI insisted on a vehicle that was built and delivered within the timeframe allowed by the Environmental Protection Agency and with the heavy, but effective General-Motors catalysts; **the only legally-built vehicle MACC ever produced was the 2012 Mosler RaptorGTR that MOSLER vigorously endeavored to destroy in the marketplace.**
131. MOSLER's ***Defamation*** of JAMES was both public to automotive journalists who published the defamation to potential buyers of the RaptorGTR and private to JAMES's potential business partners; the theme of the **profit-motivated** defamation was ***"James has serious mental illness / is legally insane, so stay away from him and don't do business with him"***.
132. MOSLER's ***Defamation*** was **profit motivated** as illustrated by MOSLER secretly trying to sell more RaptorGTRs via asking automotive journalists to write that RaptorGTRs were only available directly through himself, and that *"[James] Todd [Wagner] is no longer employed by Mosler in any capacity. He's been off on his own for quite a while now."*; see **Exhibit "F"** containing PL#76 attached hereto.
133. MOSLER's ***Trade Libel*** was targeted directly at the 2012 Mosler RaptorGTR for the profit motive of driving JAMES and SEI into financial apocalypse such that JAMES would sign away SEI's Intellectual Property and Exclusive Distributorships for a ***mere \$100***; clearly the absurd "consideration" was presented for the MOSLER's **pleasure** knowing he had fully destroyed the man who had worked so hard to make MOSLER's supercar project a success.
134. MOSLER's ***Trade Libel*** effort was MOSLER directly via his paid staff fraudulently stating to journalists untruths including but not limited to: "The RaptorGTR won't pass emissions and isn't certifiable for public sale"; "Todd is not a distributor."; "The RaptorGTR [that SEI was selling] is not an Official Mosler Product." (see **Exhibit "E"** illustrating MACC-VP reporting back to MOSLER that

she is following MOSLER's instructions on what to state to journalists, and that JAMES [Todd] is being successfully ***"mutilated"*** and unable to obtain a job).

135. MOSLER's ***Trade Libel*** is extraordinarily bold because what MOSLER is falsely-stating that JAMES/SEI did is precisely what MOSLER/MACC actually-did for the 2004 and 2009 Mosler MT900S.

136. At the time of MOSLER's 2011-2012 Trade Libel, JAMES simply couldn't believe MOSLER was doing this due to the bizarreness of MOSLER lying about the only vehicle MACC ever built legally; the term "gaslighting" has recently been coined to describe such **deceptions** – MOSLER's press releases and advertisements for the 2004 MT900, 2009 MT900 and 2011 Photon state ***"MT900 is the top performance sportscar, manufactured US Legal"*** – a bold lie stated publicly for a profit motive (see **Compound Exhibit "G"** attached hereto).

137. MOSLER's ***Insider Trading*** is described elsewhere within this Complaint and on WarrenMosler.co, thus for brevity will not be expanded upon in this section of the Complaint illustrating the decades-long pattern of illegal behavior.

138. MOSLER's ***Perjury*** includes lying about the non-existence of 18,500+ pages of evidence in responses to Requests for Production, inducing the Vice President of MACC to lie to Judge Hafele and present an false-alternative-reality that ***"Warren is big on the phone"*** to obscure the existence of the e-mail evidence.

139. MOSLER's ***Perjury*** also includes stating in 2016 Deposition that he did, in fact, state to Matt Farah that the 2012 Mosler RaptorGTR wouldn't pass emissions and wasn't an 'Official Mosler Product'; **leading Matt Farah to conclude that JAMES was a con-man** – then denying same to the jury in the 2023-TRIAL (see **Compound Exhibit "H"**)

140. MOSLER's **Perjury** further includes producing a sworn affidavit to the Court that his net worth in 2023 was between [est]\$89,999,999 and \$110,000,001 when his true net worth is over \$2 Billion inclusive of the 10% equity stakes in AVM which earns nearly \$500 million per year and III-CM which earns approx. \$2 Billion per year; this perjury was executed for the **profit-motive** of limiting what the Jury could award to JAMES for the **Punitive Damages** element of the 2023-TRIAL
141. JAMES has seen MOSLER's withheld-for-over-6-years sworn affidavit of financial worth; this document will be subpoenaed for privacy reasons.
142. MOSLER's **Tax Evasion** is different from the Tax Avoidance that MOSLER structurally executed via moving to St. Croix USVI in 2003 to shield his AMV and III-CM income from United States Federal Taxes, while still enjoying the protections of the United States military and financial opportunities in the USA.
143. MOSLER's **Tax Evasion** includes forcing USA taxpayers to subsidize construction of **very expensive toys** (costing between \$200,000 and \$500,000 each) **built by MACC and given away for FREE** or with backdoor payments to MOSLER directly (bypassing MACC) to MOSLER's family and financial partners including Jacob Mosler, Warren Mosler, Thomas Olafsson (AVM/III-CM partner), Robert Printz (AVM/III-CM partner), Michael Reger (AVM/III-CM partner) and Alan Simon (MOSLER's attorney); see **Compound Exhibit "I"**.
144. MOSLER's **Serial Scamming of people out of "Good Faith Deposits"** is illustrative of **MOSLER taking pleasure in the suffering of others**; MOSLER is clearly not in any desperate need of money, thus the scams were strictly for pleasure and teaching his son, Jacob Mosler, how to conduct scams like Dad.
145. MOSLER's **Serial Scamming people out of "Good Faith Deposits"** consists of using a con-artist intermediary to serve as the 'fraud paperwork generator' to supplement MOSLER's **promise** that the Good-Faith-Deposit will be refundable; the external con-artist is asked to SECRETLY generate paperwork

that REVERSES MOSLER's promise that "a" Good-Faith-Deposit will be refundable (see also **Compound Exhibit "J"**).

146. MOSLER's first ***Serial Scamming people out of "Good Faith Deposits"*** used the LEW-LEE-CON-TEAM as the con-artist intermediary; the second scam of a "Good Faith Deposit" used MOSLER's son, Jacob Mosler, as intermediary.

147. MOSLER's ***Serial Scamming of people out of "Good Faith Deposits"*** is executed against those who place their trust in MOSLER for the dual purpose of **profit and pleasure**.

148. MOSLER's ***Serial Scamming of people out of "Good Faith Deposits"*** bypassed MACC, even though it was MACC assets being purchased; this is another element of **Tax Evasion** (same as what MOSLER did with the supertoys).

149. Hedge Funds do not create or build anything tangible, but rather they take 2% of assets under management and 20% of the profits generated in a given year; therefore it is important for III-CM to convey to its investors that III-CM has a competitive advantage in making trades to overcome this large cost to the investors.

150. III-CM utilizes the immense competitive advantage of MOSLER's Insider Access to the United States Federal Reserve.

151. As a citizen of the United States of America ('USA'), and a taxpayer to USA; I have to pay higher taxes and be indirectly liable for higher deficits because III-CM has been able to "Buy-Low and Sell-High" TREAS due to the Insider Information conveyed by MOSLER to AVM and III-CM.

152. MOSLER's illegal Insider Information also benefits MOSLER directly, as the bulk of his personal wealth is managed by III-CM.

153. Evidence of III-CM's illegal Insider Information competitive advantage is in its statistically-improbable consistent string of years with above-average returns on capital combined with dearth of years showing a loss.
154. After the first few days of the 2023-TRIAL, MOSLER blocked my path and said to me, "You're better off giving up now. You'll lose less money. You won't get anything from me."; I thought that was just intimidation at the time, but looking back it was MOSLER taking **pleasure** in my known-future-suffering of losing due to the already-bribed Judge.
155. The structure of the bribe was likely in multiple stages; as MOSLER requested AND RECEIVED additional, grossly-improper rulings in his favor as described in Paragraphs 150, 151, and 152.
156. The Stage-1-Bribe eliminated SEI's Expert Witness on Lost Profits and took the two \$100million+ counts away from the Jury mid-trial (96% of estimated case value completely removed from the Jury's right to deliver a Verdict).
- a. Critical expert, Cinnamin O'Shell excluded.
 - b. Mid-Trial Directed Verdict excluded Count-III "Exclusive Distributorships", Count-IV "Fraudulent Inducement", and Count-IX "Defamation Per Se" that had passed gatekeeping (by prior Judge Hafele) for Punitive Damages.
 - c. 1st Motion for Judgement Notwithstanding the Verdict to remove a \$150,000 Jury Verdict about the \$100,000 deposit.
157. The Stage-2-Bribe took 96% of the remaining 4% of case value away; \$850,000 which would become approximately \$1,800,000 after 13 years of interest and restoration of JAMES's attorney's fees.
- a. 2nd Motion for Judgement Notwithstanding the Verdict ('JNOV')

158. The Stage-3-Bribe eliminated the remaining \$33,894 away from JAMES; this final unlawful act by DELGADO paves the way for DELGADO to unilaterally (without the opportunity for appeal) force JAMES to pay MOSLER's estimated \$2,000,000 in legal fees.
- a. 3rd JNOV; granted despite Judge Delgado admitting evidence exists.
159. On or about November 6, 2024 at approximately 12:45pm at West Palm Beach Courthouse employee of Palm Beach County, Judge Luis Delgado, immediately after being informed that his previous 22 actions to remove a Jury's Awards to James Todd Wagner and Supercar Engineering, Inc. over the preceding 18 months **would only statically occur within an "in control" judicial system once every 37,000,000 years**; Judge Luis Delgado effectively claimed there were even more instances within the 3500+ pages of sworn testimony and admitted exhibits that constituted "no evidence nor inference in a light most favorable to Plaintiffs to justify a finding for Plaintiffs",.
160. The transcript for the November 6, 2024 hearing for MOSLER's 3rd JNOV Motion being heard 17-months after the 2023-TRIAL is attached as **Exhibit "K"**.
161. Motion for Sanctions for 4-year-pattern of Deception of the Court, which is 248 pages long containing proofs of TEN individual deceptions of the Court by both MOSLER and MOSLER's attorney, Steven Weber [D.E. 866].
162. On January 10, 2025; MOSLER initiated legal action in attempt to force JAMES to pay MOSLER's legal fees including fees for MOSLER's 4-man legal team during the 11-day trial.
163. The recent Presidential election illustrated that the majority are aware that the "Liberal Elite" deceiving people and creating systems that facilitate fraud (such as prohibiting no voter ID and using media as propaganda machine);

MOSLER as a member of the “Liberal Elite” attempted to deceive the Jury nearly non-stop and the Jury saw through it – thus bribing the Judge to strip 100.0% of the Lawsuit away from the Jury was **MOSLER’s only option.**

164. Now MOSLER wishes to utilize his bribe(s) to induce Judge Luis Delgado to force me to pay MOSLER’s legal fees; a ruling that JAMES will not have the ability to appeal.

165. Bribing a judge to induce him to illegally remove 100% of the issues from the jury then using the same compromised-judge to force legal fees on the victim is the type of coordinated illicit behavior that RICO law was designed to combat.

166. Con artists endeavor to financially ruin their victims completely for the dual benefit of taking as much as possible from them and eliminating their capability to fight back.

167. MOSLER has exhibited this ‘Con Artist’ behavior of attempting to run JAMES into the ground in three distinct ways as described in Paragraphs 168, 169, 170, and 171.

168. MOSLER conned JAMES into providing a \$100,000 deposit to purchase MACC with the fraudulent promise to return it to me in the event MOSLER sold MACC to someone other than me; MOSLER refusing to return this enormous sum was to limit my ability to retain counsel to fight back against the numerous other wrongdoings MOSLER did to me for the purpose of stealing my Intellectual Property and forcing me to sign over my company’s Exclusive Distribution rights.

169. MOSLER instructed MACC to purchase materials and labor, thus the supercar-products were owned by MACC; MOSLER demanded that JAMES’s \$100,000 deposit be wired to MOSLER directly instead of to the owner of the assets that the \$100,000 was intended to purchase.

170. The \$100,000 Wire Transfer direct to MOSLER was wire fraud, as further proven by MOSLER's deposition whereby MOSLER admitted the \$100,000 was spent of MOSLER's private jet.
171. Refusing to return JAMES's \$100,000 and repeatedly threatening further financial destruction of JAMES and his family unless JAMES signs a full-release for MOSLER.
172. Sworn testimony during the 2023-TRIAL includes data on JAMES's \$100,000 wire transfer being secretly and illicitly used to fund MOSLER's private jet.
173. MOSLER has cemented the \$100,000 Wire Fraud via bribing Judge Luis Delgado to ignore extensive, obvious facts at the 2023-TRIAL and allow MOSLER to fully steal the \$100,000 from JAMES.
174. MOSLER collaborated with his son, Jacob Mosler, in attempting a similar fraud against a second would-be purchaser of MACC assets; data about this second "Good Faith Deposit Scam" attempt is documented in the 2023-TRIAL.
175. MOSLER used Defamation and Trade Libel to make it impossible for SEI to sell the RaptorGTR that MACC built and sold to SEI; for the purpose of financially **destroying JAMES so that Plaintiff would crumble under further threats of financial annihilation** and succumb to signing over my Intellectual Property and Exclusive Distributorships; see **Exhibit "L"** attached hereto.
176. MOSLER refused to pay my experts their expert-witness-fees for the depositions that MOSLER wanted to have them participate in; then MOSLER conducted absurdly-lengthy depositions; lastly forcing me to pay those fees putting me in further financial peril.

177. MOSLER Countersued me seven years into the lawsuit prosecution for refusing to sign the “Termination and Release” document, which was engineered to ostensibly-steal my Intellectual Property, Exclusive Distributorships, and \$100,000 deposit ***in return for \$100.***
178. 2023-TRIAL testimony about MOSLER’s efforts to force JAMES to sign the “Termination and Release” via using MOSLER’s position-of-power to execute Defamation and Trade Libel to push JAMES into financial destruction and vulnerability; thus JAMES would surrender his assets under duress; **Exhibit “M”**.
179. JAMES is truly ***“Outmatched”*** as MOSLER threatened 13 years ago; as such JAMES has taken the steps to warn others about what MOSLER could do to them via publishing ***WarrenMosler.co***, which outlines the pattern of illegal behavior executed by MOSLER.
180. JAMES has been in a truly horrible financial condition for years trying to fight against a ruthless MOSLER, who ***upon knowing he was going to lose up to \$300,000,000 inclusive of Punitive Damages – Bribed the Judge.***
181. Considering the convincing case with over 3500 pages of evidence describing a range of felonies and proving the case elements, there is no way that MOSLER would have succeeded in getting the Jury’s Verdict overturned.
182. Bribery was MOSLER’s only path to prevailing.
183. For MOSLER’s benefit, DELGADO Court-Ordered that all 3500+ pages of evidence are ***“no evidence, nor possible inference in a light most favorable to Plaintiffs.”***

184. For clarity of Notice, RICO element #1 is Bribery of Circuit Court Judge Luis Delgado by MOSLER or someone under MOSLER's direction the purpose of improperly winning Florida Circuit Court Case 50-2012-CA-023358-XXXX-MB AG.
185. For clarity of Notice, RICO element #2 is Blackmail conducted by MOSLER and MOSLER's paid employee, Sylvia Klaker.
186. For clarity of Notice, RICO element #3 is Extortion conducted by MOSLER via MOSLER's paid employee, Alan Simon.
187. For clarity of Notice, RICO element #4 is Perjury conducted by MOSLER for the purpose of misleading a jury about MOSLER's role in speaking falsehoods to journalists about JAMES.
188. For clarity of Notice, RICO element #5 is MOSLER inducing the Vice-President of MACC, Jill Wagner, into committing perjury before Judge Hafele in 2018 regarding the existence of emails, whether Warren Mosler or Alan Simon was running the operations at MACC, and whether or not MACC built the 2012 Mosler RaptorGTR.
189. For clarity of Notice, RICO element #6 is intentional violation of Environmental Protection Agency ('EPA') clean air laws via MOSLER directing MACC employees to build supercar vehicles using ultralight, non-tested catalysts at times after the EPA Certificate of Conformity had expired; MOSLER withheld the EPA Certificate of Conformity from MACC employees for the purpose of enabling this fraud.
190. For clarity of Notice, RICO element #7 is participating in Alan Simon's insurance fraud of over \$220,000 associated with the illegally-constructed 2004 Mosler MT900s via MOSLER withholding documents about the insurance fraud from Mr. Simon's insurance company and withholding properly-requested Production of documents about the insurance fraud from JAMES for over 5 years

such that JAMES could not blow the whistle on the insurance fraud due to expiration of Statute of Limitations for frauds.

191. For clarity of Notice, RICO element #8 is Wire Fraud whereby MOSLER directed JAMES to wire a \$100,000 deposit for the purchase of MACC assets direct to MOSLER with the written promise to return the deposit in the event another party purchased MACC assets; then by actions illustrate that the promise was a fraudulent inducement at MOSLER had no intention of returning the money to JAMES and hasn't.
192. For clarity of Notice, RICO element #9 is Tax Evasion whereby MOSLER in collaboration with several of his friends, family, financial partners whom have been named in this Complaint were gifted taxpayer-subsidized Supercars.
193. For clarity of Notice, RICO element #10 is illegal Insider Trading of United States Treasury Securities via MOSLER's access to the U.S. Federal Reserve obtained for the purpose of pitching MOSLER's "Modern Monetary Theory".
194. For clarity of Notice, RICO element #11 is AVM funding the illicit activities described in this Complaint.
195. For clarity of Notice, RICO element #12 is III-CM funding the illicit activities described in this Complaint.
196. Under **Florida Statutes § 895.02(4)**, a "pattern of racketeering activity" is defined as engaging in at least two incidents of racketeering conduct that have the same or similar intents, results, accomplices, victims, or methods of commission, or otherwise are interrelated by distinguishing characteristics and are not isolated incidents.

197. List of the illicit acts for which Plaintiff has extensive sworn testimony and exhibits already admitted with the Court includes:

- a. Theft by Fraudulent Inducement in year 2011 - 2025
- b. Blackmail in year 2012
- c. Sabotage of Property in year 2012
- d. Extortion in years 2012-2013
- e. Spoliation of Evidence in years 2014 – 2024
- f. Perjury in years 2016 – 2023
- g. Insurance Fraud and thwarting Whistleblowing on same in years 2011 – 2018
- h. Violation of Federal Clean Air Laws years 2006 – 2017
- i. Tax Evasion in years 2004 – 2017
- j. Insider Trading with United States Treasuries years 2004 – 2023
- k. Bribery of Florida Circuit Court Judge in years 2023 – 2024

198. AVM and III-CM provided financial backing that enabled the illicit acts.

199. AVM and III-CM participated in the Tax Evasion and Violation of Federal Clean Air Laws via Partners receiving Supercars from MOSLER's hobby Supercar company.

200. The Pattern of Racketeering Activities are related to each other via the person in charge of the entities, Warren Mosler, orchestrating and benefitting from all of the illicit activities stated in this Complaint.

201. The Pattern of Racketeering Activities are related to each other via James Todd Wagner being a common victim to the illicit activities.

202. JAMES has been is the 100% owner of SEI since it was formed in 2004; SEI owned the 2012 Mosler RaptorGTR serial #001, Intellectual Property integrated into the 838hp EPA-certified powertrain of the RaptorGTR, and 25-year Exclusive Distributorships for Mosler products in the countries of Thailand, China, United Arab Emirates, and Saudi Arabia.
203. JAMES is directly-damaged when SEI is damaged.
204. Noone else is damages when SEI is damaged.
205. The pattern of illicit behavior described in proceeding Paragraphs was admitted as sworn testimony and admitted-without-objection Exhibits during the 2023-TRIAL; full 2023-TRIAL transcript and exhibits admitted without objection are available at *warrenmosler.co*.
206. Blackmail conducted in **year 2012**, damaged JAMES via resulting in MOSLER gaining control of JAMES's 100%-owned company, SEI's, \$700,000 product: 2012 Mosler RaptorGTR.
207. Sabotage of Property in **year 2012** damaged JAMES via MOSLER instructing someone at MACC to fill the engine of the 2012 Mosler RaptorGTR with water. Jacob Mosler, MOSLER's son, was working at MACC at the time of the sabotage.
208. Extortion in **years 2012-2013** damaged JAMES via MOSLER instructing his attorney, Alan Simon, to refuse to return the 2012 Mosler RaptorGTR unless JAMES and SEI signed an "Acknowledgement" that the 2012 Mosler RaptorGTR was actually a 2009 Mosler MT900 that had no warranty.
209. Spoliation of Evidence in **years 2014 – 2024** damaged JAMES via forcing extensive legal fees be incurred before eventually receiving over 18,500 pages of Spoliated Evidence three weeks after MOSLER's personal attorney reluctantly admitted that he had forwarded 'responsive documents' to Defense "years ago".

210. Spoliation of Evidence in **years 2014 – 2024** damaged JAMES because MOSLER refused to provide his Phone Records to Plaintiffs, then used the lack of evidence to claim that he couldn't remember the phone calls that MOSLER had made to journalists to deliver false statements about JAMES and the 2012 Mosler RaptorGTR that was beneficially owned by JAMES at the time.
211. Perjury in **years 2016 – 2023** damaged JAMES in numerous ways including but not limited to: deceiving a Circuit Court Judge, Judge Hafele, that evidence did not exist; deceiving the Jury that MOSLER couldn't remember conversations with journalists where false statements were conveyed; deceiving the Judicial System via a sworn affidavit about MOSLER's net-worth which was approximately 5% of MOSLER's actual net worth.
212. Insurance Fraud and thwarting Whistleblowing on insurance fraud in **years 2011 – 2018** damaged JAMES via MOSLER retaliating and removing JAMES from the MACC contacts list after JAMES refused to participate in the fraud in the manner that MOSLER's attorney instructed JAMES to participate.
213. Insurance Fraud and thwarting Whistleblowing on insurance fraud in **years 2011 – 2018** included thwarting JAMES's whistleblowing efforts via refusing to give critical evidence that was requested via 2012-LAWSUIT RFQ until after the 5-year statute of limitations had expired.
214. Violation of Federal Clean Air Laws in **years 2006 – 2020** damaged JAMES via poisoning the air that JAMES is required to breath in the United States of America, and via being used by MOSLER as a tool to financially destroy JAMES via changing the VIN number on the 2012 Mosler RaptorGTR to that of an illegally-constructed 2009 Mosler RaptorGTR, and lastly via instructing MACC to continue selling known-to-be illegally-constructed 2004 Mosler MT900s vehicles until approximately 2020.

215. Tax Evasion in **years 2004 – 2017** damaged JAMES via forcing JAMES to contribute more (on average) taxes to the United States Government to make up for the shortfall created by MOSLER's tax evasion; extensive sworn proof of tax evasion is in JAMES's possession and more will be found via the Discovery process.
216. Insider Trading with United States Treasuries ('TREASURIES') in years 2004 – 2023 damaged JAMES via forcing JAMES to contribute more (on average) taxes to the United States Government to make up for the shortfall created by MOSLER's insider trading of TREASURIES that led to AVM and III-CM buying Treasuries at lower prices than would have been achieved without insider-information and then selling TREASURIES at higher prices than would have been achieved without insider-information; resulting in the United States Government as the 'counterparty' losing money, while III-CM gains money.
217. Theft by Deception and Fraud in **years 2011 – 2025 damaged** JAMES via MOSLER convincing JAMES that his \$100,000 deposit would be refunded if someone else purchased MACC assets, then MOSLER stole the deposit after selling MACC assets to RP High Performance; to this day, MOSLER refuses to return JAMES's \$100,000 deposit.
218. Bribery of Florida Circuit Court Judge in **years 2023 – 2024** damaged JAMES via stripping 100% of the 10-Counts of a 2012-LAWSUIT away from the Jury inclusive of \$850,000 in Jury Verdict, \$500,000 in legal fees, and over \$310,000,000 in expected Jury Verdict from Count-III and Count-IX-with-Punitive-Damages, which at MOSLER's behest was stripped out of the jury's Verdict Form before the jury could deliver a verdict.
219. In the case of Bribery, the only way to discern the precise amount of Damages is to have a second trial on the elements removed mid-trial and allow a new jury determine the damages that MOSLER generated via bribing the judge.
220. The Pattern of Racketeering Activities all generated profit and satisfaction for Warren Mosler and the entities he founded.

221. Warren Mosler did not limit any enterprise's illicit activities via moral boundaries; ***behavior ranging from Blackmail to Bribery*** were executed if it benefitted Mr. Mosler and/or entities in which MOSLER had an equity stake.
222. The enterprises involved in this RICO action, AVM and III-CI, are both large financial products companies that they are regulated by the Securities and Exchange Commission.
223. Warren Mosler is founder of both AVM (previously "Adams, Viner, and Mosler") and III-CM, and Mr. Mosler confirmed he still retains 10% ownership stake both enterprises during a February 10, 2016 sworn deposition.
224. Warren B. Mosler is 100% owner of MACC, and Defendants were beneficiaries of illicit activities that MOSLER instructed MACC to perform.
225. MACC's funding came indirectly from the profits of AVM and III-CM.
226. MACC sold vehicles constructed in violation of Federal Clean Air laws to principals of AVM and III-CM,.
227. The MACC vehicles sold to principals of AVM and III-CM were part of a Tax Evasion scheme.
228. At MOSLER's direction, MACC **gave** vehicles constructed in violation of Federal Clean Air laws to principals of AVM and III-CM,.
229. At MOSLER's direction, MACC vehicles were **given** to principals of AVM and III-CM as part of a Tax Evasion scheme.
230. Without the profits of AVM and III-CM, MOSLER could not have conducted the pattern of illicit activity described in this Complaint, therefore AVM and III-CM participated in the pattern of illicit activity.

231. Relating to Florida Law Chapter 517, AVM constitutes a “Boiler Room” dealing in “Federal Covered Securities” and securities issued by foreign governments around the world.
232. Relating to Florida Law Chapter 517, III-CM constitutes a “Boiler Room” dealing in “Federal Covered Securities” and securities issued by foreign governments around the world.
233. Relating to Florida Law Chapter 517, AVM deals in securities transactions in excess of \$50,000 to other entities with assets in excess of \$500,000.
234. Relating to Florida Law Chapter 517, III-CM deals in securities transactions in excess of \$50,000 to other entities with assets in excess of \$500,000.
235. Florida Law § 517.12 (11)(a) states, *“If the office finds that the applicant is of good repute and character and has complied with the provisions of this chapter and the rules made pursuant hereto, it shall register the applicant.”*; AVM should not be eligible for operation Florida given the range of illicit activities conducted by its principals.
236. Florida Law § 517.12 (11)(a) states, *“If the office finds that the applicant is of good repute and character and has complied with the provisions of this chapter and the rules made pursuant hereto, it shall register the applicant.”*; III-CM should not be eligible for operation Florida given the range of illicit activities conducted by its principals.
237. Relating to Florida Law Chapter 517, Warren Mosler is and/or has been a “Control Person” for AVM.
238. Relating to Florida Law Chapter 517, Warren Mosler is and/or has been a “Control Person” for III-CM.

239. Relating to Florida Law Chapter 517, Robert Printz is a “Control Person” for AVM; Mr. Printz’s heavily-discounted purchase of an illegally-built 2004 MT900s was participation in tax evasion, participation in violation of Federal Clean Air Laws, and participation in funding MOSLER’s other illicit activities.
240. Relating to Florida Law Chapter 517, Robert Printz is a “Control Person” for III-CM; Mr. Printz’s heavily-discounted purchase of an illegally-built 2004 MT900s was participation in tax evasion, participation in violation of Federal Clean Air Laws, and participation in funding MOSLER’s other illicit activities.
241. Relating to Florida Law Chapter 517, Thomas Olafsson is a “Control Person” for AVM; Mr. Olafsson’s receipt of a gifted, illegally-built 2004 Mosler MT900s was a Tax Evasion gift and contributed to violation of Federal Clean Air Laws.
242. Relating to Florida Law Chapter 517, Thomas Olafsson is a “Control Person” for III-CM; Mr. Olafsson’s receipt of a gifted, illegally-built 2004 Mosler MT900s was a Tax Evasion gift and contributed to violation of Federal Clean Air Laws.
243. Florida Law § 517.1217, Rules of conduct and prohibited business practices for dealers and their associated persons, requires ethical conduct by the Principals of the dealers.
244. Florida Law § 517.161, **Revocation, denial, or suspension of registration of dealer**, investment adviser, intermediary, or associated person.— (1) Registration under s. 517.12 may be denied or any registration granted may be revoked, restricted, or suspended by the office if the office determines that such applicant or registrant; any member, principal, or director of the applicant or registrant or any person having a similar status or performing similar functions; or any person directly or indirectly controlling the applicant or registrant: k) Has had a **final judgment entered against her or him in a civil action** upon grounds of **fraud**, embezzlement, **misrepresentation**, or **deceit**.

245. MOSLER had an enormous motivation to have Count-IV, **Fraudulent Inducement**, removed from the jury mid-trial via bribing the judge; at MOSLER's request Judge Luis Delgado executed the removal of Count-IV from the jury.
246. Regarding Florida Law § 517.301, Fraudulent transactions; falsification or concealment of facts.— (1) It is unlawful and a violation of the provisions of this chapter for a person: To employ any device, scheme, or artifice to defraud; use of 'Modern Monetary Theory' to obtain private, confidential meeting with the United States Federal Reserve and similar entities around the world and then provide investing advice based upon private information to AVM is Insider Trading that defrauds counterparties to the scheme.
247. Regarding Florida Law § 517.301; Fraudulent transactions; falsification or concealment of facts.— (1) It is unlawful and a violation of the provisions of this chapter for a person: To employ any device, scheme, or artifice to defraud; use of 'Modern Monetary Theory' to obtain private, confidential meeting with the United States Federal Reserve and similar entities around the world and then provide investing advice based upon private information to III-CM is Insider Trading that defrauds counterparties to the scheme.
248. Regarding Florida Law § 517.301; MOSLER's fraudulent inducement of a \$100,000 deposit from JAMES and attempted second "Good Faith Deposit Scheme" that is memorialized in the transcript and documentary evidence admitted without objection constitutes a scheme that disqualifies MOSLER and the entities who benefit from MOSLER's investment timing information from being registered to perform financial business in Florida.
249. Referencing Florida Law § 517.311 False representations; deceptive words; enforcement; MOSLER did not state "*Registration does not imply that*

*such person has been sponsored, recommended, or approved by the state or any agency or officer of the state or by the United States or any agency or officer of the United States.” when inducing JAMES to submit the \$100,000 deposit nor when MOSLER attempted to con a second victim out of a “**good faith deposit**”.*

250. A key section of Florida Law § 517.34 is (a) “**Financial exploitation**” means the wrongful or unauthorized taking, withholding, appropriation, or use of money, assets, or property of a specified adult....Obtain control over the specified adult’s money, assets, or property through deception, intimidation...”

251. MOSLER used **deception** to financially exploit JAMES in the form of taking obtaining control over JAMES’s \$100,000 deposit for the purpose of theft; **Compound Exhibit “L”** contains sworn testimony and 2023-TRIAL admitted exhibits about this Fraudulent-Inducement and MOSLER’s second attempted Fraudulent-Inducement scam of an unrelated potential purchaser of MACC.

252. MOSLER financially exploited JAMES via the use of **intimidation** and threat of ***suing JAMES into bankruptcy if JAMES didn’t sign a Full Release*** to allow MOSLER to steal the \$100,000; **Compound Exhibit “O”** contains sworn testimony and admitted exhibits about the use of intimidation for \$100,000 theft.

253. MOSLER successfully stole \$100,000 from JAMES and attempted a second theft-by-deception of a would-be depositor while operating as an officer of both AVM and III-CM.

254. MOSLER preyed upon JAMES, knowing JAMES believed MOSLER to be honest given that enterprises MOSLER founded and own execute hundreds of millions of dollars in trades per business day.

255. As a multi-billionaire, MOSLER did not need to steal \$100,000 from JAMES and train Jacob Mosler to conduct a second theft-by-deception of another depositor; **these thefts were for the pleasure of seeing suffering.**
256. Trial testimony about MOSLER making the unethical choice to NOT HONOR his agreements include: pg 1582 ln 13-14 “A All he had to do was honor his agreements. Boom, done, that would be it.”; pg 1587 ln 1-4 “fundamentally, Mr. Mosler trades hundreds of millions of dollars and has to honor his agreements. I thought for sure Mr. Mosler would honor his agreements, his written agreements.”; pg 1622 ln 15-17 “I had my butt kicked pretty hard here and I didn't know what was going on. I know it's pretty clear Mr. Mosler was not going to honor his agreements.” Pg 1717 ln 20-22 “Everything would be hunky-dory, but he never wanted to honor his agreements, not one.”
257. Being aware that MOSLER deals in hundreds of millions of dollars in trades and deposits from big firms such as the ‘Canadian Teacher’s Pension Fund’ via MOSLER’s ownership of AVM and III-CM; JAMES relied on MOSLER’s honesty as a Hedge Fund businessman when making the \$100,000 deposit decision.
- 258. JAMES is a trusting person; MOSLER preyed upon that trust.**
259. JAMES created JudgeX.org to assist young victims of human trafficking who made the mistake of trusting an intrinsically-evil person-of-power.
260. Florida Law § 626.989 on Insurance Fraud includes; “(a) A person commits a “fraudulent insurance act” if the person: 1. Knowingly and with intent to defraud presents, causes to be presented, or prepares with knowledge or belief that it will be presented, to or by an insurer, self-insurer, self-insurance fund, servicing corporation, purported insurer, broker, or any agent thereof, any written statement as part of, or in support of, an application for the issuance of, ...”.

261. Regarding Florida Law § 403.727(3)(b) and § 626.989; MOSLER knowingly built vehicles illegally.
262. Regarding Florida Law § 403.727(3)(b), § 626.989, § 817.233, and § 817.234; MOSLER's attorney, Alan Simon, handled EPA-Compliance and knew the 2004 Mosler MT900S was built illegally.
263. Regarding Florida Law § 626.989, § 817.233, and § 817.234; MOSLER and Alan Simon both knew the 2004 Mosler MT900S had a severe fire risk defect and jointly decided to withhold that information from owners and insurers.
264. Regarding Florida Law § 626.989, § 817.233, and § 817.234; MOSLER punished JAMES for not pumping-up the value of the illegally-built, illegally-insured 2004 Mosler MT900s with a known fire risk.
265. Regarding Florida Law § 626.989, § 817.233, and § 817.234; MOSLER commanded MACC perform a 'Factory Recall' only after Alan Simon had collected his fraudulent \$220,000+ payout
266. Regarding Florida Law § 626.989, § 817.233, and § 817.234; MOSLER received a 'subjugation letter' and refused to inform the Insurers of the critical data that would lead the Insurers to rightly not honor the Supercar-burning-claim.
267. Regarding Florida Law § 626.989, § 817.233, and § 817.234; MOSLER hid the insurance fraud victim's name and 'subjugation letter' from JAMES until after the 5-year statute of limitation had expired.
268. Most, but not all, of the Insurance Fraud data plus photos is available on <https://warrenmosler.co/insurance-fraud-case/>.
269. Insurance Fraud is important for the RICO case, because several principals of AVM and III-CM including the President of both entities, Robert Printz, participated in insurance fraud via purchasing or being gifted the illegally-

constructed vehicles, insured them for use on public roads, and used the illegal vehicles on public roads.

270. Referring to Florida Law § 655.50 Florida Control of Money Laundering and Terrorist Financing in Financial Institutions; AVM and III-CM hold and trade the equivalent of **billions of dollars** to, between, and for institutions all over the world – reaching as far as Japan.
271. Foreign institutions in Mexico are often partly-owned by cartel and/or pay money to cartels as a form of shadow-tax; these cartels and possibly the financial institutions that pander to them are now formally labeled as “foreign terrorists”.
272. JAMES worked at AVM, and saw first-hand hundreds of millions of dollars per day in “swaps” and similar financial instruments being traded and recorded only on PRIVATE SERVERS within the counterparties.
273. JAMES saw no opportunity for validation that the trades were not money laundering; JAMES was **not asked to perform any anti-money-laundering** activity nor checks while in the employment of AVM under the direct supervision of AVM-President, Robert Printz.
274. Defendants’ participation in insider trading and tax evasion strongly suggests that Defendants are also involved in other illicit activity such as laundering money and facilitating the funding of terrorism.
275. Regarding Florida Law § 655.50(b); *“A financial institution may keep a record of any financial transaction occurring in this state, regardless of the value, if it suspects that the transaction involves the proceeds of specified unlawful activity”*; JAMES was involved in booking billions of dollars in international money transactions and never once saw nor heard of any of the traders nor transaction booking personnel making any inquiry regarding potential money laundering being conducted via AVM.

276. At AVM, mere minutes were allotted for booking \$100,000,000+ swaps and similar derivative trades across countries; AVM did not wish for employees to ask questions about money laundering and did not allot time to investigate money laundering.
277. AVM paid its employees generously; ensuring cooperation.
278. Regarding Florida Law § 655.50 (10)(a.)3; *“Financial transactions totaling or exceeding \$100,000 in any 12-month period, commits a felony of the first degree, punishable as provided in s. [775.082](#) or s. [775.083](#).”*; JAMES estimates AVM creates **over 2500 trades that are EACH in excess of \$100,000** each in any 12-month period.
279. Regarding Florida Law § 812.014 *“Theft.— (1) A person commits theft if he or she knowingly obtains or uses, or endeavors to obtain or to use, the property of another with intent to, either temporarily or permanently: (a) Deprive the other person of a right to the property or a benefit from the property. (b) Appropriate the property to his or her own use or to the use of any person not entitled to the use of the property. (2)(a)1. If the property stolen is valued at \$100,000 or more.. the offender commits grand theft in the second degree, punishable as a felony of the second degree”*; during sworn testimony in May 2023, JAMES discovered MOSLER’s immutable goal to permanently-deprive JAMES of \$100,000.
280. Data provided by Robert Printz, President of AVM and III-CM, indicates that MOSLER’s deposit of JAMES’s \$100,000 in III-CM would be worth greater than \$455,000 today in the III-CM Hedge Fund; discovery of III-CM’s financial performance beginning June 29, 2011 is necessary to obtain a specific figure.
281. MOSLER’s bribery of Judge Luis Delgado was executed for the purpose of permanently-depriving JAMES of his \$100,000 deposit that **the jury ruled** should be returned to JAMES in the amount of \$150,000 [plus interest].

282. Regarding Florida Law § 815.04; *“Offenses against intellectual property;... (2) A person who willfully, knowingly, and without authorization destroys data, programs, or supporting documentation residing or existing internal or external to a computer, computer system, computer network, or electronic device commits an offense against intellectual property. ... (b) If the offense is committed for the purpose of devising or executing any scheme or artifice to defraud or to obtain any property, the person commits a felony of the second degree, punishable as provided in s. [775.082](#), s. [775.083](#), or s. [775.084](#).”*; MOSLER’s effectively-destroyed over 18,500 pages of evidence and induced perjury before Judge Hafele (the judge in Division AG prior to Judge Luis Delgado) to cover it up.
283. Regarding Florida Law § 815.06(2); *”A person commits an offense against users of computers, computer systems, computer networks, or electronic devices if he or she willfully, knowingly, and without authorization or exceeding authorization:... (d) Destroys, injures, or damages any computer, computer system, computer network, or electronic device;... a person who violates subsection (2) commits a felony of the third degree, punishable as provided in s. [775.082](#), s. [775.083](#), or s. [775.084](#).”*; while aware of a lawsuit against him, MOSLER disposed MACC email server to frustrate JAMES’s production requests, responded “none” to 95%+ of RFP requests, and induced his MACC’s co-officer (who was also in receipt of a gifted Supercar) to commit perjury to cover up MOSLER’s destruction of evidence.
284. MOSLER is aware of his unethical computer actions via on video searching his phone-based gmail server during a February 10, 2016 deposition and again claiming no emails existed; **Exhibit “N”** is sworn testimony and MOSLER-submitted documents that support RICO Complaint Paragraph 235.
285. More than 3 years later, after painful and expensive depositions in multiple states, MOSLER was induced to provide 18,500+ pages of evidence.

286. Defendants never previously informed JAMES that AVM hid evidence.
287. Defendants never previously informed JAMES that III-CM hid evidence.
288. MOSLER took steps to brag to JAMES about AVM and III-CM's immense financial power, and that MOSLER managed immense amounts of money within these institutions; JAMES was duped to believe that MOSLER could be trusted.
289. Thus, JAMES was duped into believing MOSLER was an honest businessman who could be relied-upon to honor his agreements and provide evidence when needed to pursue truthful resolutions.
290. Regarding Florida Law § 817.034 "*Florida Communications Fraud Act.— (4) OFFENSES.— (a) Any person who engages in a scheme to defraud and obtains property thereby is guilty of organized fraud, punishable as follows: 1. If the amount of property obtained has an aggregate value of \$50,000 or more, the violator is guilty of a felony of the first degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.*"; MOSLER solicited JAMES's \$100,000 with the explicit promise that the \$100,000 was refundable, MOSLER then blocked JAMES utilization of that \$100,000 in part via GIFTING the three used 2004 Mosler MT900S Supercars to principals of AVM and III-CM.
291. MOSLER's tax evasion scheme with AVM and III-CM simultaneously deprived JAMES of the assets he was intending to purchase, thus giving the Supercars to AVM and III-CM principals simultaneously supported both Tax Evasion and Theft by Deception.
292. Regarding Florida Law § 817.034 definitions, "Scheme to defraud" means a systematic, ongoing course of conduct with intent to defraud one or more persons, or with intent to obtain property from one or more persons by false or fraudulent pretenses, representations, or promises or willful misrepresentations of a future act.

293. From the perspective of the Federal Bureau of Investigation, an “Advance Fee Scheme” involves such false mis-representations of future actions in order to conduct theft of money to be provided up-front; MOSLER not only obtained \$100,000 but also engineering labor and sales efforts via several “Advance Fee Schemes” put into writing with zero intent to honoring.
294. MOSLER’s zero-intent-to-honor-agreements is obvious in his violation of numerous agreements THE SAME DAY or VERY NEXT DAY; while vigorously hiding these intentional violations from his victim, JAMES.
295. MOSLER’s “Advance Fee Scheme” behavior is consistent with someone who would execute the numerous felonies described in this Complaint within a system of entities that mimics Organized Crime.
296. MOSLER performed the illicit communication acts against a Florida resident, JAMES, from MOSLER’s offshore tax-haven home in St. Croix, USVI.
297. Regarding Florida Law § 836.05; *“Threats; extortion.—Whoever, either verbally or by a written or printed communication, maliciously threatens to accuse another of any crime or offense, or by such communication maliciously threatens an injury to the person, property... shall be guilty of a felony of the second degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.”*; MOSLER threatened JAMES numerous times in both writing and over the phone as is detailed in **Exhibit “O”**.
298. A verbal threat delivered by MOSLER shortly after JAMES refused to sign the ‘Full Release’ that MOSLER wanted is memorialized in the following testimony on pg 1207 ln 16-22: *A But I actually got a phone call from Mr. Mosler and he just tells me, "Hey, Todd, you know, you're outmatched here. I won't do it, but Savvas is the type of guy who will sue you for anything and then you'll have to hire a lawyer for \$400 an hour to defend yourself until you're broke. **That's the way things work in America.**"*

299. During the May 2023 trial, MOSLER had several days during the May 2023 trial including JAMES's cross-examination and MOSLER's Defense presentation to refute JAMES testimony; MOSLER didn't even attempt to refute JAMES testimony about the "You're outmatched here..." threat.
300. Numerous exhibits admitted into evidence are written threats to JAMES that tout MOSLER's financial power in attempt to intimidate JAMES and make certain JAMES knows the threat of being frivolously sued into bankruptcy is realistic.
301. MOSLER followed through on the threat via countersuing JAMES for not signing the 'Full Release'; upon losing MOSLER appealed and lost again.
302. The second instance of MOSLER violating Florida Law § 836.05 on Threats and Extortion is that: after using Blackmail to gain control of the 2012 Mosler RaptorGTR, MOSLER via his attorney, Alan Simon, refused to return the \$700,000 property until JAMES signed an illegal "acknowledgement" that supported MOSLER's efforts to forever-deprive JAMES of his company's Intellectual Property and Exclusive Distributorships.
303. MOSLER's extortion effort was enhanced via threat to put a lien on SEI's property and charge \$1060/mo "storage" until JAMES complied.
304. Florida Law § 837.02 states "*Perjury in official proceedings.— (1) Except as provided in subsection (2), whoever makes a false statement, which he or she does not believe to be true, under oath in an official proceeding in regard to any material matter, commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084*"; MOSLER's direct perjury and inducing perjury in his co-officer of MACC, Jill Wagner, is extensively documented in this Complaint and supporting documents, thus will not be repeated here.

305. Regarding Florida Law § 838.015 Bribery.— (1) *“Bribery” means to knowingly and intentionally give, offer, or promise to any public servant, or, if a public servant, to knowingly and intentionally request, solicit, accept, or agree to accept for himself or herself or another, any pecuniary or other benefit not authorized by law with an intent or purpose to influence the performance of any act or omission which the person believes to be, or the public servant represents as being, within the official discretion of a public servant, in violation of a public duty, or in performance of a public duty.”*; BRIBERY is traditionally difficult to prove because there are thousands of avenues to deliver a bribe, thousands of offshore banks in places such as St. Croix, and now thousands of cryptocurrencies that are designed to be untraceable.
306. JudgeX is an adaptation of Statistical Process Control, which was invented in America, first adopted by Toyota, and currently used all over the world in nearly every industry.
307. The Judicial System vigorously defends its privacy, absolute-authority, and dearth of punishments; which creates a fertile environment for Bribery, which is commonplace in offshore locations such as Peru, Judge Delgado’s birthplace.
308. Judicial bribery is often used by Human Traffickers who wish to get out of responsibility of hunting little girls and having them raped to death (less than 10% of little girls escape alive); Homeland Security who attempts to prosecute the evil men behind this routinely bribe the judge.
309. A JudgeX analysis outputs a single number: the number of years between when the sequence of actions would happen in a natural / non-bribed condition.
310. In the last in-person Hearing in front of Judge Luis Delgado, he was informed that this statistical analysis output was that his 22 independent rulings that within the 3500+ pages of evidence there was “no evidence” could only happen in an “in control” judicial system once every 37,000,000,000 years (double the calculated lifespan of the universe); Judge Luis Delgado was induced

to ignore that damning statement and deliver the 3rd JNOV victory per Warren B. Mosler's written request.

311. It is statistically impossible for Judge Luis Delgado to honestly make 24 claims of "no evidence" within the 11-day trial that included 259 admitted exhibits.
312. JudgeX analysis on MOSLER's in-opposition-to-law-and-logic victory can be found at <https://judgex.org/statistical-process-control/>.
313. Judge Luis Delgado served his first term as Judge to the Circuit Court beginning August 2022; taking on the workload to execute "Legislating from the Bench" at the behest of a wealthy Defendant to remove Plaintiffs' Constitution-Enshrined right to a trial by jury.
314. In addition to ignoring the Standard for declaring evidence is "no evidence", Judge Delgado ignored judicial norm that requires a JNOV to be filed within similar time-frame of a Motion for New Trial; 10 days after trial.
315. Reason for this judicial norm is that with 1500+ cases, it is impossible to expect that a Judge can remember the details and facets of a trial including reactions of witnesses beyond a week or two; ***much less a year and a half***.
316. Trial Court granted Defendants' 2nd JNOV 11 months after trial and Defendants 3rd JNOV 17 months after trial when it illogical that Trial Court could accurately remember all facets of the trial.
317. At the JNOV hearing 17-months after trial, Plaintiffs reminded Judge Delgado that removing the will of the jury was very high bar [because it is **impossible for a judge with 1800 cases to remember testimony details a 18 months later**]; Judge Delgado turned to look at Defendants and gave Defendants what they wanted.

318. The Final Judgement that REMOVED EVERY ELEMENT OF THE JURY'S VERDICT was delivered **18 months after trial**.
319. JudgeX's strength is very-simply illustrating that a SERIES of events is (or is not) 'Beyond a Reasonable Doubt' the resultant of corruption.
320. For example, a person could dis-honestly 'roll snake-eyes' 10-times-in-a-row in a **matter of minutes** by hand-placing each die with the "1" facing up; illustrating corruption.
321. For example, via rolling properly and assuming of 5-seconds per roll; a person would honestly 'roll snake-eyes' 10-times-in-a-row in an "In Control" condition **once every 211 billion years**; illustrating the statistics of honesty.
322. Reasonable persons would evaluate the series of **24** bizarre rulings required to shift victory to Warren B. Mosler and conclude the judge was bribed.
323. MOSLER likely-knew that he could only win if Judge Delgado declared 3500+ pages of evidence that was admitted without objection was "***no evidence nor inference in a light most favorable to Plaintiffs.***"
324. MOSLER requested the statistically-impossible victory; and Judge Luis Delgado obeyed via THE SOLE PATH AVAILABLE; ***declaring everything was "no evidence"***.
325. After JAMES and JAMES's attorney vigorously challenged Judge Delgado's "***Once in 37 Billion Years***" series of 22 impossible decisions, JUDGE DELGADO SLIPPED UP AND ADMITTED ON THE RECORD THAT EVIDENCE EXISTED, AND HE WAS DELIVERING THE WIN TO THE BILLIONAIRE ANYWAY.

326. In addition to the 22 statistically-impossible “no evidence nor inference” written orders in Judge Delgado’s “Final Orders”; Judge Delgado made 2 more statistically-impossible orders to complete the full-victory for Warren B. Mosler.

327. In case it isn’t already obvious that there is a mountain of evidence which persuaded a jury to award \$850,000; **the Judge himself admitted there is evidence**; see final page of the final exhibit, **Exhibit “T”**.

a. A year and a half after trial, Defendants 3rd Motion for Judgement Notwithstanding the Verdict; Judge Delgado speaking:

25 THE COURT: I think if I look at the evidence,

Judge Luis Delgado
November 06, 2024

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1 maybe he worked 50 percent of the time for a salary
2 that wasn't determined and I think those damages are
3 speculative. JNOV is granted.

328. Judge Delgado has been given numerous promptings and opportunities to explain why X / Y / Z evidence is rather “no evidence”; and Judge Delgado consistent declines to state why particular elements of evidence are “no evidence”; see Nov. 6, 2024 transcript for Platintiffs latest effort for a response as to why evidence is Court-claimed to be “no evidence” in Exhibit “K”.

329. 15th Circuit Court Judges, including Judge Delgado, have/had large caseloads, thus spending months of extra time to ensure victory for an offshore mult-billionaire is additional proof that Judge Luis Delgado was financially incentivized to spend taxpayer money on generating paperwork, attending hearings, and outputting “Final Orders” to improperly shift victory to MOSLER.

330. *Judge Delgado was removed from the Circuit Court bench two weeks after delivering his Final Verdict that removed the jury for the benefit of a billionaire.*
331. MOSLER's billionaire-level capability to deliver a bribe is derived directly from AVM and III-CM.
332. MOSLER's \$55,000,000 loss in MACC proves that AVM and III-CM were necessary enterprises to cover the large MACC-loss and provide capital to bribe Judge Luis Degado.
333. Defendants accepted the benefits of illicit actions described herein.

RICO LAW § 895 AND § 772: selected clauses

895.05 Civil remedies.—

(1) Any circuit court may, after making due provision for the rights of innocent persons, enjoin violations of the provisions of s. 895.03 by issuing appropriate orders and judgments, including, but not limited to:

(a) Ordering any defendant to divest himself or herself of any interest in any enterprise, including real property.

(b) Imposing reasonable restrictions upon the future activities or investments of any defendant, including, but not limited to, prohibiting any defendant from engaging in the

same type of endeavor as the enterprise in which the defendant was engaged in violation of the provisions of s. 895.03.

(c) Ordering the dissolution or reorganization of any enterprise.

(a) Either party may demand a trial by jury in any civil action brought pursuant to this subsection.

(b) Any prevailing plaintiff under this subsection or s. 772.104 shall have a right or claim to forfeited property or to the proceeds derived therefrom superior to any right or claim the state has in the same property or proceeds.

(2) CRIMINAL PENALTIES AND CIVIL REMEDIES.—

2. In any action brought under this paragraph, the prevailing plaintiff shall recover threefold the actual damages by him or her sustained and the cost of the suit, including a reasonable attorney's fee.

(10) Notwithstanding any other provision of law, a criminal or civil action or proceeding under this act may be commenced at any time within 5 years after the conduct in violation of a provision of this act terminates or the cause of action accrues.

(11) The application of one civil remedy under any provision of this act does not preclude the application of any other remedy, civil or criminal, under this act or any other provision of law. Civil remedies under this act are supplemental, and not mutually exclusive.

772.103 Prohibited activities.—It is unlawful for any person:

(1) Who has with criminal intent received any proceeds derived, directly or indirectly, from a pattern of criminal activity or through the collection of an unlawful debt to use or

invest, whether directly or indirectly, any part of such proceeds, or the proceeds derived from the investment or use thereof, in the acquisition of any title to, or any right, interest, or equity in, real property or in the establishment or operation of any enterprise.

(2) Through a pattern of criminal activity or through the collection of an unlawful debt, to acquire or maintain, directly or indirectly, any interest in or control of any enterprise or real property.

(3) Employed by, or associated with, any enterprise to conduct or participate, directly or indirectly, in such enterprise through a pattern of criminal activity or the collection of an unlawful debt.

(4) To conspire or endeavor to violate any of the provisions of subsection (1), subsection (2), or subsection (3).

772.104 Civil cause of action.—

(1) Any person who proves by clear and convincing evidence that he or she has been injured by reason of any violation of the provisions of s. [772.103](#) shall have a cause of action for threefold the actual damages sustained and, in any such action, is entitled to minimum damages in the amount of \$200, and reasonable attorney's fees and court costs in the trial and appellate courts.

COUNT I: Providing Funding for Bribery (JAMES sues AVM)

334. Plaintiff realleges Paragraphs 1 – 333.
335. Per Florida Statute 838.015, bribery occurs when someone corruptly offers, gives, or promises, or if a public servant corruptly solicits, requests, accepts, or agrees to accept any benefit with the intent or purpose to influence an official act or omission.
336. Providing the funding for a bribe is considered equivalent to providing the bribe.
337. AVM knew about the 2012-LAWSUIT as it was served with a subpoena for deposition on the 2012-LAWSUIT.
338. AVM knew or should have known that its founder, MOSLER, was using profits of AVM for illicit purposes.
339. After October 4, 2007, AVM principal, Robert Printz, acquired a highly-discounted, illegally-built, illegally-sold, illegally-insured Mosler MT900S with the Manufacturer's Statement of Origin illustrating the vehicle was illegal via stating it was a "2004" Mosler MT900s (DEF221 – DEF223 in **Exhibit "P"**).
340. AVM knew that its founder was conspiring with other AVM management for the illicit purposes of enabling Tax Evasion and flagrant violation of United States Clean Air Laws.
341. AVM was aware or should have been aware that AVM was part of a larger scheme of generating profits for use in illicit behavior such as bribing a Florida Circuit Court Judge.
342. AVM did nothing to prohibit use of its profits for bribery.

DAMAGES

Plaintiff is entitled to damages due to MOSLER's bribery, which stripped Plaintiff of his right to due process and his "day in Court".

Plaintiff seeks:

****Economic Damages of \$400,000 plus prejudgement interest from the date MOSLER created the damages in 2011.**

****Economic Damages of estimated \$500,000 in legal fees and expenses associated with the 2012-LAWSUIT, which would have been forthcoming had the bribery not occurred.**

****Economic Damages of estimated \$2,000,000 of lost of earning capability due to the bribery.**

****Non-Economic Damages for pain and suffering, mental anguish, and loss of enjoyment of life.**

****Punitive Damages, under Florida Statutes § 768.72, due to the malice or gross negligence of Defendant.**

****Future Damages of estimated \$250,000 for the cost of conducting a second lawsuit for the elements of the 2023-TRIAL which were improperly removed from the jury mid-trial on or about May 23, 2023.**

PRAYER FOR RELIEF

James Todd Wagner demands judgement against AVM for:

- a. Treble Damages per Florida Statute § 772.104;
- b. Prejudgement Interest;
- c. Post-Judgement Interest;
- d. Punitive Damages, subject to granting of leave to amend for Punitive damages per Florida Statute § 768.72;
- e. Court costs;

- f. Court preparation costs;
- g. Any and all other relief the Court deems just and proper.

Count II: Providing Funding for Bribery (JAMES sues III-CM)

343. Plaintiff realleges Paragraphs 1 – 333.
344. Per Florida Statute 838.015, bribery occurs when someone corruptly offers, gives, or promises, or if a public servant corruptly solicits, requests, accepts, or agrees to accept any benefit with the intent or purpose to influence an official act or omission.
345. Providing the funding for a bribe is considered equivalent to providing the bribe.
346. III-CM management and AVM management share the same workspace in Boca Raton, Florida; thus information is shared openly between III-CM and AVM.
347. III-CM knew about the 2012-LAWSUIT as it was served with a subpoena for deposition on the 2012-LAWSUIT.
348. Robert Printz became President of both AVM and III-CM during the prosecution of the 2012-LAWSUIT.
349. III-CM knew that its founder was conspiring with other III-CM management for the illicit purposes of enabling Tax Evasion and flagrant violation of United States Clean Air Laws.
350. III-CM was aware or should have been aware that III-CM was part of a larger scheme of generating profits for use in illicit behavior such as bribing a Florida Circuit Court Judge.
351. III-CM did nothing to prohibit use of its profits for bribery.

DAMAGES

Plaintiff is entitled to damages due to MOSLER's bribery, which stripped Plaintiff of his right to due process and his "day in Court".

Plaintiff seeks:

**Economic Damages of \$400,000 plus prejudgement interest from the date MOSLER created the damages in 2011.

**Economic Damages of estimated \$500,000 in legal fees and expenses associated with the 2012-LAWSUIT, which would have been forthcoming had the bribery not occurred.

**Economic Damages of estimated \$2,000,000 for loss of earning capability due to the bribery.

**Non-Economic Damages for pain and suffering, mental anguish, and loss of enjoyment of life.

**Punitive Damages, under Florida Statutes § 768.72, due to the malice or gross negligence of Defendant.

**Future Damages of estimated \$250,000 for the cost of conducting a second lawsuit for the elements of the 2023-TRIAL which were improperly removed from the jury mid-trial on or about May 23, 2023.

PRAYER FOR RELIEF

James Todd Wagner demands judgement against III-CM for:

- a. Treble Damages per Florida Statute § 772.104;
- b. Prejudgement Interest;
- c. Post-Judgement Interest;
- d. Punitive Damages, subject to granting of leave to amend for Punitive damages per Florida Statute § 768.72;
- e. Court preparation costs;
- f. Any and all other relief the Court deems just and proper.

COUNT III: Bribery of Circuit Court Judge Luis Delgado
(JAMES sues MOSLER)

352. Plaintiff realleges Paragraphs 1 – 333.
353. Plaintiff realleges Paragraphs 335 – 336.
354. MOSLER has the financial means to bribe Judge Luis Delgado.
355. MOSLER has the motive to bribe Judge Luis Delgado.
356. MOSLER expressly requested the actions of Judge Luis Delgado to make the false claims that there is “no evidence nor inference” in 24 instances (‘24-INSTANCES’)
357. EACH of Judge Luis Delgado’s 24-INSTANCES are statistically-improbable given the 3500+ pages of evidence in the trial record.
358. EACH of Judge Luis Delgado’s 24-INSTANCES are improbable given the fact that Defendants objected on the basis of relevance to less than 1% of the items of evidence.
359. EACH of Judge Luis Delgado’s 24-INSTANCES are each improbable given the fact that Judge Delgado, himself, never made reference to the legitimacy of the evidence as it was being communicated to the jury.
360. The SERIES of 24-INSTANCES is ostensibly-impossible to occur outside of bribery; intentional corruption of facts in favor of one party.
361. MOSLER accepted the benefit of Judge Luis Delgado eliminating Verdict the jury, which attended all 11 days of Trial.
362. MOSLER caused numerous judicial-documents to be drafted by his attorney, Steven Weber, which were always post-bribe adopted by Judge Luis Delgado irrespective of the rules, norms and laws being violated by therein.

363. MOSLER accepted the benefit of Judge Luis Delgado's December 13, 2024 adoption of Defendant's drafted Final Judgement.

364. MOSLER is presently taking advantage of the bribery of Judge Luis Delgado via attempting to force JAMES to pay MOSLER's legal fees.

DAMAGES

Plaintiff is entitled to damages due to MOSLER's bribery, which stripped Plaintiff of his right to due process and his "day in Court".

Plaintiff seeks:

****Economic Damages of \$400,000 plus prejudgement interest from the date MOSLER created the damages in 2011.**

****Economic Damages of estimated \$500,000 in legal fees and expenses associated with the 2012-LAWSUIT, which would have been forthcoming had the bribery not occurred.**

****Economic Damages of estimated \$2,000,000 for loss of earning capability due to the bribery.**

****Non-Economic Damages for pain and suffering, mental anguish, and loss of enjoyment of life.**

****Punitive Damages, under Florida Statutes § 768.72, due to the malice or gross negligence of Defendant.**

****Future Damages of estimated \$250,000 for the cost of conducting a second lawsuit for the elements of the 2023-TRIAL which were improperly removed from the jury mid-trial on or about May 23, 2023.**

PRAYER FOR RELIEF

James Todd Wagner demands judgement against MOSLER for:

- a. Treble Damages per Florida Statute § 772.104;
- b. Prejudgement Interest;
- c. Post-Judgement Interest;
- d. Punitive Damages, subject to granting of leave to amend for Punitive damages per Florida Statute § 768.72;
- e. Court costs;
- f. Court preparation costs;
- g. Any and all other relief the Court deems just and proper.

COUNT IV: Racketeer Influenced and Corrupt Organizations Act ('RICO')

(JAMES sues AVM)

365. Plaintiff realleges Paragraphs 1 – 333.

366. Plaintiff realleges Paragraphs 335 – 342.

367. Plaintiff realleges Paragraphs 346 – 351.

368. Plaintiff realleges Paragraphs 354 – 364.

369. AVM's founder and 10% equity holder, MOSLER, conducted a **pattern** of illegal activities including Blackmail, Extortion, Perjury, Inducing Perjury in Others, Insurance Fraud, Violation of Federal Clean Air Laws, Defamation, Trade Libel, Theft by Deception, Wire Fraud, Tax Evasion, Insider Trading on United States Treasuries, and Bribery of a Circuit Court Judge; as such RICO is appropriate for this Civil Action.

370. AVM provided funding for a bribe to a Circuit Court Judge in the 15th Judicial Circuit of Florida.

371. AVM's founder and 10% equity-holder, MOSLER, benefitted from the bribe via inducing Judge Luis Delgado to 100% eliminate the will of the Jury in the 2023-TRIAL.
372. AVM, via its President, Robert Printz, participated in Tax Evasion via minimizing the profits of MACC via consuming a deeply-discounted 2004 Mosler MT900S MACC vehicle, which eliminated taxable income from MACC.
373. AVM via its President, Robert Printz, participated in flagrant violation of United States Clean Air rules via consuming an illegally-constructed 2004 Mosler MT900S MACC vehicle.
374. AVM, via its principal Thomas Olafsson, participated in Tax Evasion via minimizing the profits of MACC via consuming a gifted 2004 Mosler MT900S MACC vehicle, which eliminated taxable income from MACC.
375. AVM via its principal, Thomas Olafsson, participated in flagrant violation of United States Clean Air rules via consuming an illegally-constructed 2004 Mosler MT900S MACC vehicle.
376. MOSLER owned 100% of MACC, which was wound down in 2018.
377. MOSLER testified that he owned 10% of AVM at all times relevant to this lawsuit.
378. MOSLER invented and promotes "Modern Monetary Theory", commonly called 'MMT' to government entities all over the Earth.
379. Bloomberg, the financial markets trade journal, described Warren B. Mosler as ***"The Godfather of Modern Monetary Theory"***.
380. MMT supports governments printing money and accumulating sovereign debt that the government can "pay" by printing more money.

381. The Chair of Joe Biden's Counsel of Economic Advisors, Jared Bernstein, is famously quoted, *"The government definitely prints money, and it definitely lends that money ... by selling bonds. Is that what they do? They sell bonds, yeah, they sell bonds. Right? Since they sell bonds, and people buy the bonds and lend them the money. I guess I'm just, I can't really, I don't get it. I don't know what they're talking about."*
382. Jared Bernstein continues in his interview about Modern Monetary Theory, *"At least to my ear, the language and concepts of MMT can be unnecessarily confusing, but there is no question that the government prints money and then uses that money to umm ummm; I don't get it."*
383. The cult-like following of MMT and adoption of MMT's "print as much money as you want" [paraphrased] concepts were embraced by Zimbabwe and other 3rd-world countries which ***subsequently experienced runaway inflation, starvation, and death of local-currency billionaires.***
384. Zimbabwe printed a local-currency 100,000,000,000,000 [100 Trillion] bill.
385. One interpretation of MMT, is the government can do whatever it wants with money because it holds the ultimate-power over citizens of the Country.
386. MOSLER provides trading information regarding the United States Federal Reserve ('FED') to AVM for the purposes of optimizing profits associated with trading securities.
387. MOSLER leveraged his claimed-expertise in MMT, as the inventor of MMT, to obtain insider access to the FED.
388. MOSLER testified at the 2023-TRIAL regarding his access to the FED on pg 2073 In 15-16: ***"These were confidential meetings, or they were private meetings."***

389. A reasonable person will understand that when MOSLER is “pitching” MMT to decision-makers inside the FED, unless those decision-makers have a perfect-poker-face it will become clear to MOSLER if the decision-maker being pitched is ‘buying-it’ or rejecting the concepts of MMT.
390. It is illogical to assume MOSLER, equipped with information from “confidential private meetings” with the FED, would choose to make money-losing decisions with that information.
391. It is logical to assume MOSLER has been using the information obtained to help AVM generate profits.
392. AVM benefits and profits from MOSLER-provided Insider Information linked to the FED.
- 393. The profits of AVM flow back to MOSLER in terms of a consulting fee and MOSLER’s 10% equity stake.**
394. MOSLER pitches MMT to governments around the world.
395. AVM benefits from MOSLER-provided Insider Information linked to the government securities issued outside of the United States.
396. AVM benefitted from deceptions about MMT.
397. ‘Left-Leaning’ governments embrace MMT and use it to justify excessive spending including awarding contracts to persons chosen by the men and women in power.
398. MMT was embraced by the United States government under Joe Biden.
399. Excessive government spending, justified by MMT, leads to inflation.

400. All citizens of a country experiencing inflation must pay higher prices for basic goods such as food and gasoline.

401. MMT led to the illegal insider-information that has benefitted AVM.

402. Illegal Insider Information has allowed principals of AVM to become wealthy at the expense of other citizens of the United States of America.

403. JAMES is a citizen of the United States of America.

404. MOSLER, AVM's founder, is presently conducting further illegal behavior via use of Judge Luis Delgado's judicial power to force JAMES to pay MOSLER's legal expenses, which are expected to total approximately \$2,000,000.

DAMAGES

According to Florida RICO statute § 895.05, Plaintiff is entitled to recover treble damages, court costs, court preparation costs, and reasonable attorneys fees for violations. Plaintiff is entitled to Compensatory Damages:

**Direct Economic Loss due to Blackmail is estimated at \$371,000.

**Direct Economic Loss due to Extortion is estimated at \$371,000.

**Direct Economic Loss due to Perjury is estimated at \$200,250,000.

**Direct Economic Loss due to Inducing Perjury Others is est. \$40,000.

**Direct Economic Loss due to Insurance Fraud is estimated at \$3,737,700.

**Direct Economic Loss due to Intentional Violation of EPA Clean Air Laws is nominal for one individual.

**Direct Economic Loss due to Defamation is estimated at \$2,000,000.

**Direct Economic Loss due to Trade Libel is estimated at \$133,666,772.

**Direct Economic Loss due to Theft by Deception is \$150,000.

**Direct Economic Loss due to Wire Fraud is \$455,981 per III-CM data provided by Robert Printz in 2015.

**Direct Economic Loss due to Tax Evasion requires detailed Production from Defendant to evaluate.

**Direct Economic Loss due to Insider Trading requires detailed Production from Defendant, and is estimated to be \$15,100.

**Direct Economic Loss due to Bribery of Florida Circuit Court Judge is estimated at \$310,000,000.

**Direct Economic Loss due to MMT-Generated Inflation over the time-period that MOSLER has had insider access to the FED will be accurately calculated once it is determined through discovery the time-period whereby MOSLER has had “confidential/private” meetings with the FED and associated inflation; loss estimated to be \$5,000 per year multiplied by thirty years: \$150,000.

- Total Compensatory Damages is estimated to be \$651,107,053.
- Consequential Damages including loss of reputation and loss of ability to secure employment in positions similar to Plaintiffs Yale School of Management graduation year 2000 classmates is included as a direct economic loss due to Defamation, thus will not be duplicated here.
- Plaintiff seeks treble damages on the compensatory damages, resulting in a total damage claim of \$1,953,221,158.
- Plaintiff seeks recovery of all costs and reasonable attorney's fees associated with this action.
- Plaintiff seeks prejudgement interest from the date of the specific injury to until the judgement is entered, as allowed by law.

- In Conclusion, Damages in RICO cases are trebled per statute as a deterrent to future corrupt actions; the total damages being sought in this Count III inclusive of trebling is \$1,953,221,158.

PRAYER FOR RELIEF

James Todd Wagner demands judgement against AVM for:

- a. Treble Damages;
- b. Prejudgement Interest;
- c. Post-Judgement Interest;
- d. Punitive Damages, subject to granting of leave to amend for Punitive damages per Florida Statute § 768.72;
- e. Attorneys fees.
- f. Reasonable compensation for Court preparation costs.
- g. Any and all other relief the Court deems just and proper.

COUNT V: Racketeer Influenced and Corrupt Organizations Act ('RICO')

(JAMES sues III-CM)

- 403. Plaintiff realleges Paragraphs 1 – 333.
- 404. Plaintiff realleges Paragraphs 335 – 342.
- 405. Plaintiff realleges Paragraphs 346 – 351.
- 406. Plaintiff realleges Paragraphs 354– 364.
- 407. Plaintiff realleges Paragraphs 378– 390.

- 408. III-CM's founder and 10% equity holder, MOSLER, conducted a **pattern** of illegal activities including Blackmail, Extortion, Perjury, Inducing Perjury in Others, Insurance Fraud, Violation of Federal Clean Air Laws, Defamation, Trade Libel, Theft by Deception, Wire Fraud, Tax Evasion, Insider Trading on United States Treasuries, and Bribery of a Circuit Court Judge; as such RICO is appropriate for this Civil Action.

- 409. III-CM illegally provided funding for a bribe to a Circuit Court Judge in the 15th Judicial Circuit of Florida.

- 410. III-CM's founder and 10% equity-holder, MOSLER, benefitted from the bribe via inducing Judge Luis Delgado to 100% eliminate the will of the Jury in the 2023-TRIAL.

- 411. III-CM, via its President, Robert Printz, participated in Tax Evasion via minimizing the profits of MACC via consuming a deeply-discounted 2004 Mosler MT900S MACC vehicle, which eliminated taxable income from MACC.

- 412. III-CM via its President, Robert Printz, participated in flagrant violation of United States Clean Air rules via consuming an illegally-constructed 2004 Mosler MT900S MACC vehicle.

413. III-CM, via its principal Thomas Olafsson, participated in Tax Evasion via minimizing the profits of MACC via consuming a gifted 2004 Mosler MT900S MACC vehicle, which eliminated taxable income from MACC.
414. III-CM via its principal, Thomas Olafsson, participated in flagrant violation of United States Clean Air rules via consuming an illegally-constructed 2004 Mosler MT900S MACC vehicle.
415. MOSLER owned 100% of MACC, which was wound down in 2018.
416. MOSLER testified that he owns 10% of III-CM.
417. MOSLER's 10% equity stake in III-CM is owned via a St. Croix, USVI holding company, called "Valance Co., Inc." ('VALANCE').
418. 2012-LAWSUIT production and numerous verbal communications on the topic show that via locating in St. Croix, USVI and using the shell company, VALANCE, MOSLER enjoys all of the protections of the United States, while only being taxed 3.5% of his III-CM profits.
419. United States Securities and Exchange ('SEC') documents admitted into evidence for the 2012-LAWSUIT indicate that III-CM has \$\$57,115,755,602 [over \$57 Billion] under management on May 12, 2022.
420. On the SEC filing, AVM is listed as "marketer" for III-CM.
421. III-CM profits by the Hedge-Fund standard "two and twenty" formula, which yields approximately \$2,000,000,000 [\$2 Billion] per year profit.
422. III-CM has the financial capability to provide funding for a bribe.
423. It is logical to assume MOSLER has been using the information obtained to help III-CM generate above-normal financial returns, leading to

- accumulation of greater assets-under-management, leading to greater financial returns to MOSLER.
424. MOSLER provides trading information to III-CM.
425. MOSLER provides insider-information obtained at the FED to III-CM.
426. III-CM benefits and profits from MOSLER-provided Insider Information linked to the FED.
427. III-CM is infamous for financial returns exceeding those of its Hedge Fund peers, and having long streaks of positive returns.
428. III-CM has only had “down years” where capital-under-management lost money in 2008 (financial crisis) and 2011.
429. MOSLER pitches MMT to governments around the world.
430. III-CM’s unusually excellent financial returns are due to MOSLER’s insider access to monetary decision-makers around the world overtly or unconsciously providing insider-information to MOSLER.
431. III-CM benefits from MOSLER-provided Insider Information linked to the government securities issued outside of the United States.
- 432. The profits of III-CM flow back to MOSLER in terms of a consulting fee and MOSLER’s 10% equity stake.**
433. III-CM benefitted from deceptions about MMT.
434. ‘Left-Leaning’ governments embrace MMT and use it to justify excessive spending including awarding contracts to persons chosen by the men and women in power.
435. MMT was embraced by the United States government under Joe Biden.

436. Excessive government spending, justified by MMT, leads to inflation.
437. All citizens of a country experiencing inflation must pay higher prices for basic goods such as food and gasoline.
438. MMT led to the illegal insider-information that has benefitted III-CM.
439. Illegal Insider Information has allowed principals of III-CM to become wealthy at the expense of other citizens of the United States of America.
440. JAMES is a citizen of the United States of America.
441. MOSLER, III-CM's founder, is presently conducting further illegal behavior via use of Judge Luis Delgado's judicial power to force JAMES to pay MOSLER's legal expenses, which are expected to total approximately \$2,000,000.

DAMAGES

According to Florida RICO statute § 895.05, Plaintiff is entitled to recover treble damages, court costs, court preparation costs, and reasonable attorneys fees for violations.

Plaintiff is entitled to Compensatory Damages:

****Direct Economic Loss due to Blackmail is estimated at \$371,000.**

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****Direct Economic Loss due to Insurance Fraud is estimated at \$3,737,700.**

****Direct Economic Loss due to Intentional Violation of EPA Clean Air Laws is nominal for one individual.**

- **Direct Economic Loss due to Defamation is estimated at \$2,000,000.
- **Direct Economic Loss due to Trade Libel is estimated at \$133,666,772.
- **Direct Economic Loss due to Theft by Deception is \$150,000.
- **Direct Economic Loss due to Wire Fraud is \$455,981 per III-CM data provided by Robert Printz in 2015.
- **Direct Economic Loss due to Tax Evasion requires detailed Production from Defendant to evaluate.
- **Direct Economic Loss due to Insider Trading requires detailed Production from Defendant, and is estimated to be \$15,100.
- **Direct Economic Loss due to Bribery of Florida Circuit Court Judge is estimated at \$310,000,000.
- **Direct Economic Loss due to MMT-Generated Inflation over the time-period that MOSLER has had insider access to the FED will be accurately calculated once it is determined through discovery the time-period whereby MOSLER has had “confidential/private” meetings with the FED and associated inflation; loss estimated to be \$5,000 per year multiplied by thirty years: \$150,000.
- Total Compensatory Damages is estimated to be \$651,107,053.
 - Consequential Damages including loss of reputation and loss of ability to secure employment in positions similar to Plaintiffs Yale School of Management graduation year 2000 classmates is included as a direct economic loss due to Defamation, thus will not be duplicated here.
 - Plaintiff seeks treble damages on the compensatory damages, resulting in a total damage claim of \$1,953,221,158.
 - Plaintiff seeks recovery of all costs and reasonable attorney's fees associated with this action.

- Plaintiff seeks prejudgement interest from the date of the specific injury to until the judgement is entered, as allowed by law.
- In Conclusion, Damages in RICO cases are trebled per statute as a deterrent to future corrupt actions; the total damages being sought in this Count III inclusive of trebling is \$1,953,221,158.

PRAYER FOR RELIEF

James Todd Wagner demands judgement against III-CM for:

- a. Treble Damages;
- b. Prejudgement Interest;
- c. Post-Judgement Interest;
- d. Punitive Damages, subject to granting of leave to amend for Punitive damages per Florida Statute § 768.72;
- e. Attorneys fees.
- f. Reasonable compensation for Court preparation costs.
- g. Any and all other relief the Court deems just and proper.

**COUNT VI: Civil Conspiracy to Conduct Illicit Acts that are Prohibited by
Racketeer Influenced and Corrupt Organizations Act ('RICO')
(JAMES sues MOSLER, AVM, and III-CM)**

- 403. Plaintiff realleges Paragraphs 1 – 333.
- 404. Plaintiff realleges Paragraphs 335 – 342.
- 405. Plaintiff realleges Paragraphs 346 – 351.
- 406. Plaintiff realleges Paragraphs 354– 364.
- 407. Plaintiff realleges Paragraphs 378– 390.

- 408. MOSLER, AVM, and III-CM are interconnected via common ownership in a Partnership structure.

- 409. MOSLER is the primary orchestrator of the illicit activities sued upon.

- 410. Robert Printz is President of both AVM and III-CM, and a Partner.

- 411. Thomas Olafsson is a Principal of AVM.

- 412. Michael Reger was a Principal of III-CM for over 20 years including the timespan of the illicit activities sued upon.

- 413. Conspiracy between Robert Printz and MOSLER is clear and illustrated by MOSLER's 2012-LAWSUIT-Production that MOSLER had Spoliated (to evade being exposed for racketeering) for over 5 years.

- 414. Conspiracy between Thomas Olafsson and MOSLER is clear and illustrated by MOSLER's 2012-LAWSUIT-Production that MOSLER had Spoliated (to evade being exposed for racketeering) for over 5 years.

- 415. Conspiracy between Michael Reger and MOSLER is clear and illustrated by MOSLER's 2012-LAWSUIT-Production that MOSLER had Spoliated (to evade being exposed for racketeering) for over 5 years.

416. AVM is secretive about its trading, and JAMES was not allowed to take any information of the 777 Yamato Rd. Boca Raton, FL “boiler room”.
417. AVM is secretive about its financial holdings, and JAMES was not allowed to take any information of the 777 Yamato Rd. Boca Raton, FL “boiler room”.
418. Plaintiff does have extensive sworn testimony from MOSLER and previously-Spoliated documents from MOSLER that clearly link MOSLER and the principals of AVM with illicit activities; see **Exhibit “Q”** and other exhibits attached to this lawsuit.
419. MOSLER only provided the Spoliated Evidence after MOSLER’s attorney cracked and admitted he had the responsive documents “years ago”.
420. Robert Printz acquired a heavily-discounted, illegally-built 2004 Mosler MT900S that was built in late 2007, and was provided with a Manufacturer’s Statement of Origin highlighting the 2004-Model-Year and after-Certification-had-expired 2007 build date.
421. Robert Printz **agreed** to accept the unfair Mosler-vehicle discount that stripped profit from MACC, thus eliminated taxable income from MACC; this illicit agreement resulted in JAMES’s having to pay more on average in taxes to make up for the shortfall of income to the FED.
422. Robert Printz **agreed** to accept an illegally-constructed Mosler-vehicle with **ultralight known-to-be-polluting catalysts** that contributed to poisoning the air that JAMES was breathing; this illicit agreement resulted in JAMES’s reduced health that the Federal Laws are in-place to protect.
423. Robert Printz **agreed** to accept stock trading information from MOLSER, whom Mr. Printz knew was gathering illegal insider information from the FED and other government monetary agencies around the world; this illicit

agreement resulted in JAMES's having to pay more on average in taxes to make up for the shortfall of securities-trading income for the FED.

424. Robert Printz **agreed** to promote "Modern Monetary Theory" with MOSLER; this agreement to promote MMT has resulted in extreme inflation that damaged JAMES.
425. Robert Printz **agreed** with MOSLER and other AVM and III-CM Principals to not train AVM and III-CM employees on how to thwart money-laundering; this illicit agreement resulted in crime growing in the world and losses in tax-collection income resulting in higher average taxes to be paid by JAMES to make up for the shortfall in tax income to the U.S. government.
426. Robert Printz actively evaded deposition in the 2012-LAWSUIT, and still has not sat for deposition.
427. Robert Printz is aware of the issues of the 2012-LAWSUIT, and still **agreed** to authorize AVM and III-CM to provide funding to MOSLER for the purpose of bribing Judge Luis Delgado.
428. Robert Printz has primarily been on the "sales" side of AVM's business; touting AVM's impressive financial track record that was generated by MOSLER's insider information from the FED and other governmental bodies.
429. **Robert Printz personally profited** from agreeing to accept insider-trading information from MOSLER regarding government-issued securities.
430. Discovery may show that Robert Printz, as President of AVM and III-CM advised MOSLER that bribing Judge Luis Delgado was necessary in order to preserve the image and profit-potential of AVM and III-CM.
431. JAMES was severely damaged by the bribery of Judge Luis Delgado.

432. Thomas Olafsson accepted a **gift** of an illegally-built 2004 Mosler MT900S valued at approximately \$200,000 that was illegally-built in 2008.
433. Thomas Olafsson **agreed** to accept the gifted Mosler Vehicle that stripped profit from MACC, thus eliminated taxable income from MACC; this illicit agreement resulted in JAMES's having to pay more on average in taxes to make up for the shortfall of income to the FED.
434. Thomas Olafsson **agreed** to accept an illegally-constructed Mosler-vehicle with ultralight known-to-be-polluting catalysts that contributed to poisoning the air that JAMES was breathing; this illicit agreement resulted in JAMES's reduced health that the Federal Laws are in-place to protect.
435. Thomas Olafsson **agreed** to accept stock trading information from MOLSER, whom Mr. Olafsson knew was gathering illegal insider information from the FED and other government monetary agencies around the world; this illicit agreement resulted in JAMES's having to pay more on average in taxes to make up for the shortfall of securities-trading income for the FED.
436. Thomas Olafsson **agreed** to promote "Modern Monetary Theory" with MOSLER; this agreement to promote MMT has resulted in extreme inflation that damaged JAMES.
437. Thomas Olafsson **agreed** with MOSLER and other AVM and III-CM Principals to not train AVM and III-CM employees on how to thwart **money-laundering**; this illicit agreement resulted in crime growing in the world and losses in tax-collection income resulting in higher average taxes to be paid by JAMES to make up for the shortfall in tax income to the U.S. government.
438. Thomas Olafsson has primarily been on the "sales" side of AVM's business; touting AVM's impressive financial track record that was generated by MOSLER's insider information from the FED and other bodies.

439. **Thomas Olafsson personally profited** from agreeing to accept insider-trading information from MOSLER regarding government-issued securities.
440. By documentation provided by MOSLER, Michael Reger paid \$189,000 for a 2009 Mosler MT900S “twin-turbo” that had a base price of \$329,000 + \$50,000 in options + \$100,000 illegal twin-turbo installation; yielding a market-correct-price of \$479,000.
441. MACC’s build-cost for Mr. Reger’s 2009 Mosler MT900S twin-turbo was \$300,000; thus Mr. Reger was effectively-gifted \$111,000 from MACC at MOSLER’s direction.
442. Michael Reger accepted a **heavily-discounted**, illegally-built 2009 Mosler MT900S with illegal, factory-installed, twin-turbos valued at \$479,000.
443. Michael Reger’s 2009 Mosler MT900S twin-turbo was built in a format for which there is no EPA Certificate of Conformity and contains ultralight, polluting catalysts.
444. Michael Reger **agreed** to accept the heavily-discounted Mosler Vehicle that stripped profit from MACC, thus eliminated taxable income from MACC; this illicit agreement resulted in JAMES’s having to pay more on average in taxes to make up for the shortfall of income to the FED.
445. Michael Reger **agreed** to accept an illegally-constructed Mosler-vehicle with ultralight known-to-be-polluting catalysts that contributed to poisoning the air that JAMES was breathing; this illicit agreement resulted in JAMES’s reduced health that the Federal Laws are in-place to protect.
446. Michael Reger **agreed** to accept stock trading information from MOSLER, whom Mr. Reger knew was gathering illegal insider information from the FED and other government monetary agencies around the world; this illicit

agreement resulted in JAMES's having to pay more on average in taxes to make up for the shortfall of securities-trading income for the FED.

447. Michael Reger **agreed** to promote "Modern Monetary Theory" with MOSLER; this agreement to promote MMT has resulted in extreme inflation that damaged JAMES.
448. Michael Reger **agreed** with MOSLER and other AVM and III-CM Principals to not train AVM and III-CM employees on how to thwart **money-laundering**; this illicit agreement resulted in crime growing in the world and losses in tax-collection income resulting in higher average taxes to be paid by JAMES to make up for the shortfall in tax income to the U.S. government.
449. Michael Reger has primarily been on the III-CM's investing business; touting III-CM's impressive financial track record that was generated by MOSLER's insider information from the FED and other bodies.
450. **Michael Reger personally profited** from agreeing to accept insider-trading information from MOSLER regarding government-issued securities.
451. AVM is differentiated from III-CM by tasks each entity performs.
452. AVM primarily organizes large trades for various customers, including III-CM.
453. AVM serves as "marketer" for III-CM per SEC filings.
454. III-CM primarily manages large pools of money from institutional investors and pension funds located around the world.
455. For decades since AVM's founding in 1982, MOSLER has communicated with principals of AVM on a weekly basis.

456. At all times relevant to this lawsuit, MOSLER communicated with AVM on a weekly basis.
457. At all times relevant to this lawsuit, MOSLER communicated with III-CM on a weekly basis.
458. For decades since III-CM's founding in 1982, MOSLER has communicated with principals of III-CM on a weekly basis.
459. MOSLER's efforts and insider access to the FED and other monetary-policy decision-makers around the world has made principals of AVM very wealthy.
460. MOSLER's efforts and insider access to the FED and other monetary-policy decision-makers around the world has made principals of III-CM very wealthy.
461. Hedge Funds are a zero-sum-game, thus as principals of III-CM became ever more wealthy as III-CM's counterparties lost money.
462. AVM, III-CM, and MOSLER all knew that JAMES was suing MOSLER and MACC via the 2012-LAWSUIT.
463. AVM did nothing to prohibit use of its funds for bribery.
464. AVM principals personally-benefitted from MOSLER's Tax Evasion efforts.
465. AVM principals personally-benefitted from MOSLER's flagrant violation of United States Clean Air Laws.
466. AVM principals personally-benefitted from MOSLER's insider-access to monetary-policy decision-makers.

467. MOSLER testified during the 2023-TRIAL pg 768 ln 21 – pg 769 ln 1 regarding elected government officials, *“I remember meeting with Blumenthal at that time with him in D.C... To discuss, you know, monetary policy economics now that he won as senator.”*
468. MOSLER testified during the 2023-TRIAL pg 769 ln 24 – pg 770 ln 1 *“I only met with Blumenthal and Sanders. I met with Bernie Sanders and his staff, Matt Starr, who was a friend of mine.”*
469. MOSLER testified *“The Federal Reserve was looking for people like myself who were major players in the financial markets to get their feel as to what was going on out there to better help them assess monetary policy.”*
470. The task of bribing a Florida Circuit Court Judge from St. Croix, USVI may have required coordination with trusted associates including Partners at AVM, Partners at III-CM, and MOSLER’s attorney, Steven Weber.
471. Providing funding for a bribe is the same as coordinating and delivering and bribe.
472. MOSLER, AVM, and III-CM conspired to cause United States citizens to suffer with MMT-justified inflation, while the Partners of AVM and the Partners of III-CM became fabulously wealthy from the same MMT-justified inflation.
473. AVM, III-CM, and MOSLER have Partnership agreements amongst each other for providing information-sharing-services, marketing-services, capital-management-services, and trading-services.
474. JAMES has first-hand knowledge of the illicit activities of the Defendants.
475. JAMES is a citizen of the United States of America.

DAMAGES

According to Florida RICO statute § 895.05, Plaintiff is entitled to recover treble damages, court costs, court preparation costs, and reasonable attorneys fees for violations. Plaintiff is entitled to Compensatory Damages:

**Direct Economic Loss due to Blackmail is estimated at \$371,000.

**Direct Economic Loss due to Extortion is estimated at \$371,000.

**Direct Economic Loss due to Perjury is estimated at \$200,250,000.

**Direct Economic Loss due to Inducing Perjury Others is est. \$40,000.

**Direct Economic Loss due to Insurance Fraud is estimated at \$3,737,700.

**Direct Economic Loss due to Intentional Violation of EPA Clean Air Laws is nominal for one individual.

**Direct Economic Loss due to Defamation is estimated at \$2,000,000.

**Direct Economic Loss due to Trade Libel is estimated at \$133,666,772.

**Direct Economic Loss due to Theft by Deception is \$150,000.

**Direct Economic Loss due to Wire Fraud is \$455,981 per III-CM data provided by Robert Printz in 2015.

**Direct Economic Loss due to Tax Evasion requires detailed Production from Defendant to evaluate.

**Direct Economic Loss due to Insider Trading requires detailed Production from Defendant, and is estimated to be \$15,100.

**Direct Economic Loss due to Bribery of Florida Circuit Court Judge is estimated at \$310,000,000.

**Direct Economic Loss due to MMT-Generated Inflation over the time-period that MOSLER has had insider access to the FED will be accurately calculated once it is determined through discovery the time-period whereby MOSLER has had “confidential/private” meetings with the FED and associated inflation; loss estimated to be \$5,000 per year multiplied by thirty years: \$150,000.

- Total Compensatory Damages is estimated to be \$651,107,053.
- Consequential Damages including loss of reputation and loss of ability to secure employment in positions similar to Plaintiffs Yale School of Management graduation year 2000 classmates is included as a direct economic loss due to Defamation, thus will not be duplicated here.
- Plaintiff seeks treble damages on the compensatory damages, resulting in a total damage claim of \$1,953,221,158.
- Plaintiff seeks recovery of all costs and reasonable attorney's fees associated with this action.
- Plaintiff seeks prejudgement interest from the date of the specific injury to until the judgement is entered, as allowed by law.
- In Conclusion, Damages in RICO cases are trebled per statute as a deterrent to future corrupt actions; the total damages being sought in this Count III inclusive of trebling is \$1,953,221,158.

PRAYER FOR RELIEF

James Todd Wagner demands judgement against MOSLER, AVM and III-CM for:

- Treble Damages;
- Prejudgement Interest;
- Post-Judgement Interest;
- Punitive Damages, subject to granting of leave to amend for Punitive damages per Florida Statute § 768.72;
- Attorneys fees.
- Court costs.
- Reasonable Court preparation costs.
- Any and all other relief the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury on all issues so triable.

Dated this 3rd day of February 2023.

James Todd Wagner, *pro se*

phone: (203)668-3904

email: j.todd.wagner@gmail.com

For reasons of personal safety, Plaintiff, is not listing his residence in Martin County.

All Court notices and communications may be sent to Plaintiff's' P.O. Box:

3300 Fairchild Gardens Ave.

P.O. Box 30159

Palm Beach Gardens, FL 33420

James Todd Wagner