SC ABS336

12/21/2022 4:45 pm

STATE OF NORTH CAROLINA

File No. 22CVS16354

Wake County

In The General Court Of Justice
☐ District ☒ Superior Court Division

Name Of Plaintiff	
Kenneth L. Bryant	
Address	
3280 NC 69, Suite 2	
City, State, Zip	
Hayesville GA 28904	

VERSUS

Name Of Defendant(s)
Bryan Donald Fields, Carsten Jason Gallini

CIVIL SUMMONS

☐ **ALIAS AND PLURIES SUMMONS (ASSESS FEE)**

G.S. 1A-1, Rules 3, 4

Date Original Summons Issued	
Date(s) Subsequent Summons(es) Issued	

To Each Of The Defendant(s) Named Below:

Name And Address Of Defendant 1	Name And Address Of Defendant 2
Bryan Donald Fields 501 80th Ave St. Petersburg Beach FL 33706	

A Civil Action Has Been Commenced Against You!

You are notified to appear and answer the complaint of the plaintiff as follows:

1. Serve a copy of your written answer to the complaint upon the plaintiff or plaintiff's attorney within thirty (30) days after you have been served. You may serve your answer by delivering a copy to the plaintiff or by mailing it to the plaintiff's last known address, and

2. File the original of the written answer with the Clerk of Superior Court of the county named above.

If you fail to answer the complaint, the plaintiff will apply to the Court for the relief demanded in the complaint.

Name And Address Of Plaintiff's Attorney (If None, Address Of Plaintiff)	Date Issued	Time	
John Kirby 4801 Glenwood Ave., Suite 200 Raleigh NC 27612	12/15/22	3	☐ AM ☑ PM
	Signature		
	☑ Deputy CSC ☐ Assistant CSC ☐ Clerk Of Superior Court		

☐ ENDORSEMENT (ASSESS FEE)
This Summons was originally issued on the date indicated above and returned not served. At the request of the plaintiff, the time within which this Summons must be served is extended sixty (60) days.

Date Of Endorsement	Time	☐ AM ☐ PM
Signature		
☐ Deputy CSC ☐ Assistant CSC ☐ Clerk Of Superior Court		

NOTE TO PARTIES: *Many counties have **MANDATORY ARBITRATION** programs in which most cases where the amount in controversy is $15,000 or less are heard by an arbitrator before a trial. The parties will be notified if this case is assigned for mandatory arbitration, and, if so, what procedure is to be followed.*

(Over)

RETURN OF SERVICE

I certify that this Summons and a copy of the complaint were received and served as follows:

DEFENDANT 1

Date Served	*Time Served* ☐ AM ☐ PM	*Name Of Defendant*

☐ By delivering to the defendant named above a copy of the summons and complaint.

☐ By leaving a copy of the summons and complaint at the dwelling house or usual place of abode of the defendant named above with a person of suitable age and discretion then residing therein.

☐ As the defendant is a corporation, service was effected by delivering a copy of the summons and complaint to the person named below.

Name And Address Of Person With Whom Copies Left (if corporation, give title of person copies left with)

☐ Other manner of service *(specify)*

☐ Defendant WAS NOT served for the following reason:

DEFENDANT 2

Date Served	*Time Served* ☐ AM ☐ PM	*Name Of Defendant*

☐ By delivering to the defendant named above a copy of the summons and complaint.

☐ By leaving a copy of the summons and complaint at the dwelling house or usual place of abode of the defendant named above with a person of suitable age and discretion then residing therein.

☐ As the defendant is a corporation, service was effected by delivering a copy of the summons and complaint to the person named below.

Name And Address Of Person With Whom Copies Left (if corporation, give title of person copies left with)

☐ Other manner of service *(specify)*

☐ Defendant WAS NOT served for the following reason.

Service Fee Paid	*Signature Of Deputy Sheriff Making Return*
$	
Date Received	*Name Of Sheriff (Type Or Print)*
Date Of Return	*County Of Sheriff*

22CV014054

STATE OF NORTH CAROLINA

COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
22-CVS-_____

KENNETH BRYANT,

Plaintiff,

v.

BRYAN DONALD FIELDS, and
CARSTEN JASON GALLINI

Defendants.

VERIFIED COMPLAINT

Plaintiff Kenneth Bryant ("**Plaintiff**" or "**Mr. Bryant**"), by and through his counsel, and allege upon personal knowledge as to himself and his own acts, and upon information and belief with respect as to all other matters, as follows:

I. INTRODUCTION

1. This case arises from the intentional and knowingly false, untrue and misrepresented statements about Mr. Bryant by Defendants Bryan Fields and Mr. Carsten Gallini ("**Defendants**") that intentionally and deliberately interfered with Mr. Bryant's contractual business relationships and prospective business relationships.

2. Defendants intentionally made such knowingly false, untrue and misrepresented statements about Mr. Bryant in order to embarrass, humiliate and harm Mr. Bryant, damage Mr. Bryant's reputation and standing in his profession/industry, render assistance in promoting competitive colleagues and dealers of Mr. Bryant, and advance Defendants' professional career and for other means not currently known by Mr. Bryant.

3. The Defendants impeached Mr. Bryant in his profession, and, without justification, wrongfully interfered with Mr. Bryant's agreements with Motorola, via their intentional and knowingly false, untrue and misrepresented statements about Mr. Bryant.

4. This lawsuit seeks to hold Defendants accountable for his acts that have caused substantial damages to Mr. Bryant, including presumed damages, which amount shall be proven at trial, but is more than Twenty-Five Thousand dollars ($25,000) and less than Seventy-Five Thousand Dollars ($75,000).

II. THE PARTIES

A. THE PLAINTIFF

5. Mr. Bryant is an individual whose principal residence is located in Clay County, North Carolina.

6. During all material times, Mr. Bryant was the sole manager and member of Bryant Enterprises, LLC, a North Carolina limited liability company, with a Georgia doing-business-as certificate as "North Georgia Communications."

7. During all materials times, Mr. Bryant was and is an authorized Motorola radio dealer through Bryant Enterprises, LLC and North Georgia Communications.

8. During all material times, Defendants had actual and constructive knowledge that Mr. Bryant resides in Clay County, North Carolina.

B. THE DEFENDANTS

9. Defendant Bryan Fields, upon information and belief, is an individual whose principal residence is located in Pinellas County, Florida.

10. During all material times, Defendant Fields was, and is, an employee of Nokia.

11. Defendant Carsten Jason Gallini, upon information and belief, is an individual whose principal residence is located in Williamson County, Texas. Defendant Gallini is apparently a part-time student and lives with his parents. Defendant Gallini owns and operates a sole proprietorship called CJ Radio Solutions, which is engaged in the two-way radio business.

12. Defendant Fields, upon information and belief, has engaged in an extensive, continuous and ongoing pattern of targeting individuals and damaging their professional reputations on the Internet through false, misleading and/or deceptive publications about them with the intent to interfere with such individuals' business relationships, including but not limited to: (i) those eleven individuals in his www.FRCreform.org Dispute from 2015 to 2017; (ii) those six individuals in his www.AllStarLink.org Dispute in 2019, (iii) the one individual in his ARDC Dispute in 2019-20; (iv) at least three other individuals and organizations in 2019; (v) two individuals through a campaign of preparing and distributing adhesive stickers, and (vi) other individuals and organizations not known currently by Mr. Bryant. A collection and summary of Defendant's past cybersmear conduct is attached and incorporated hereto as **Exhibit 1 and Exhibit 2**.

13. As alleged in this Complaint, Defendant Fields continued such pattern by knowingly and intentionally engaging in the conduct described in this Complaint with the specific intent to embarrass and humiliate Plaintiff, cause mental anguish to Plaintiff and damage Plaintiff's reputation in his profession, as well as engage in a call-to-action campaign to his audience to cease doing business with Plaintiff, all of which such efforts by Defendant were successful.

14. Defendant Fields and Defendant Gallini ["**Defendants**"] acted in concert and aided-and-abetted each other in their campaign to disparage and harass and torment the Plaintiff

as described herein; Defendant Gallini posted links to defamatory information about the Plaintiff at the direction and under the guidance of Defendant Fields; this information was prepared and gathered by Defendant Fields.

15. Defendant Fields employed and utilized Defendant Gallini to make unlawful, tortious and offensive postings on the Internet which disparaged and otherwise harmed the Plaintiff, as described herein, and as such Defendants are jointly liable to the Plaintiff.

III. JURISDICTION AND VENUE

16. This Court has subject-matter jurisdiction over all claims in this action.

17. This Court has personal jurisdiction over Defendants in this action under N.C.G.S. §1.75-4(1)(d) and (3).

18. Defendants specifically and purposefully targeted a resident of the State of North Carolina whose business is based in the State of North Carolina, which full knowledge and intent that the effects of their actions would be felt in the State of North Carolina, and thereby purposefully availed themselves of the jurisdiction of this Honorable Court.

19. Defendants committed tortious acts in the State of North Carolina by making publications directed into the State of North Carolina that contained the defamatory *per se* statements, Mr. Bryant's private personal information and other tortious conduct to interfere with Mr. Bryant's Motorola radio dealership that are the subject of this action, and engaged in a document doxing campaign targeted at Plaintiff to embarrass and harass him, cause mental anguish to him and damage his business reputation, as more particularly described in Causes of Action I – VIII of this Complaint.

20. Defendants' publications about Mr. Bryant were, and are, accessible in the State of North Carolina via the Internet and were accessed in the State of North Carolina.

21. The North Carolina long-arm statue governing limited personal jurisdiction over individuals, N.C. Gen. Stat. § 1–75.4, has been interpreted as conferring upon North Carolina courts' the maximum scope of personal "jurisdiction over nonresident defendants to the full extent permitted by the Due Process Clause." *Christian Sci. Bd. Of Dirs. Of First Church of Christ, Scientist v. Nolan*, 259 F.3d 209, 215 (4th Cir. 2001).

22. The State of North Carolina has a strong interest to protect its citizens from the conduct alleged in this Complaint.

23. Mr. Bryant's Motorola business is located in North Carolina, has a physical office and warehouse in North Carolina, receives products in North Carolina, and ships products from North Carolina.

24. Defendants' publications about Mr. Bryant were directed by Defendants to Mr. Bryant in the State of North Carolina with the specific intent and knowledge that these publications would damage Mr. Bryant in the State of North Carolina.

III. COMMON ALLEGATIONS

25. During all material times, Defendants knew that Mr. Bryant was an authorized Motorola dealer.

26. Upon information and belief, during all material times, Defendant Fields was an employee of Nokia as a Senior Consulting Engineer.

27. On or about May 7, 2022, Defendant Fields published content about Mr. Bryant in the Facebook Motorola P25/TRBO/TETRA Users Group ("**Facebook Motorola Group**"), which is a private Facebook group located at https://www.facebook.com/groups/

1544491192475817 that is dedicated to professional discussions regarding Motorola Solutions equipment, and specifically Motorola series radios and Motorola branded two way radios. A copy of this posting is attached as Exhibit 3.

28. When Mr. Bryant discovered this May 7, 2022 publication about him by Defendant Fields on the Facebook Motorola Group, Mr. Bryant believed that he knew Defendant Fields because Mr. Bryant was Facebook "friends" with the Defendant Fields, and Mr. Bryant then sent Defendant Fields a "private" Facebook message asking Defendant why he was making defamatory posts about him in their common profession/trade social media groups.

29. As it turns out, Mr. Bryant's acquaintance had a name similar to "Bryan Fields," but was not the Defendant Fields. Defendant Fields then attempted to distort this simple case of mistaken identity, of Plaintiff Bryant confusing Mr. Fields with another person having a similar name, to deflect attention from Defendant Fields' defamatory posts regarding Mr. Bryant.

30. After receiving Mr. Bryant's private Facebook message, Defendant Fields continued his information warfare and document doxing campaign against Mr. Bryant that damaged Mr. Bryant's professional reputation and interfered with Mr. Bryant's business agreements, and professional and prospective relationships.

31. Defendant Fields, in conspiracy with Defendant Gallini, began making written and verbal communications, intentionally and knowingly, regarding Mr. Bryant because Mr. Bryant was calling into question their defamatory behavior.

32. On or about June 11, 2022, Defendants began distributing and making these intentional and knowingly false, untrue and misrepresented statements about Mr. Bryant through various websites, blogs and/or social media publications; Defendant Gallini distributed the

defamatory statements through Facebook, at the direction and under the guidance and instruction of Defendant Fields.

33. Defendants' intentional and knowingly false, untrue and/or misrepresented statements about Mr. Bryant that began on June 11, 2022, and were published to multiple persons in Mr. Bryant's profession/trade at one or more of the following venues:

A. Facebook Motorola Group ("**Facebook Motorola Group**");
https://www.facebook.com/groups/1544491192475817/permalink/3172834516308135

Attached and incorporated hereto as **Exhibit 4** is a copy of Defendants' defamatory statements about Mr. Bryant that they published in concert at the Facebook Motorola Group;

B. Three Wiki pages:

1. https://wiki.w9cr.net/index.php?title=Main_Page&oldid=7280 ("**Bryan Fields main Wiki Page**")

- Attached and incorporated hereto in **Exhibit 5** is a copy of the Bryan Fields main Wiki Page which states, "Ken Bryant, K1DMR of North Georgia.Communications doesn't want you to see this."

2. https://wiki.w9cr.net/index.php/Ken_Bryant ("**Ken Bryant Wiki Page**");

- Attached and incorporated hereto as **Exhibit 6** is a copy of Defendant's defamatory statements about Mr. Bryant that Defendant published to others at the Ken Bryant Wiki Page;

3. https://wiki.w9cr.net/index.php/Ken_Bryant_Impersonation_of_Federal_Agent ("**Federal Agent Wiki Page**");

- Attached and incorporated hereto as **Exhibit 7** is a copy of Defendant's defamatory statements about Mr. Bryant that Defendant published to others at the Federal Agent Wiki Page;

C. www.fuckhams.com posts:

1. https://www.fuckhams.com/mot/index.html ("**Fuckhams.com Postings**");

- Attached and incorporated hereto as **Exhibit 8** is a copy of Defendant's defamatory statements about Mr. Bryant that Defendant published to others at the Fuckhams.com Postings, and

D. Other websites, social media sites and blogs not known currently by Mr. Bryant.

34. Defendants' intentional and knowingly false, untrue and/or misrepresented statements about Mr. Bryant that began on or about May 7, 2022, and were published at Facebook Motorola Group to multiple parties in Mr. Bryant's profession/trade, including but not limited to:

A. "Motorola Dealer!" "*IT'S JUST BEEN REVOKED!*" with Mr. Bryant's picture posted on the "*Motorola Dealership*" frame

B. Defendant commented that the person's photo in the "Revoked" frame was the "*Motorola VP of Channel Partners*" (which is Motorola's term for dealers); and

C. Publishing that Mr. Bryant *did not earn "High Honors"* with his Master's Degree in Criminal Justice by publishing "*With the exception of JD (law) degrees, Latin honors are not something you get in grad school*".

35. Defendants' intentional and knowingly false, untrue and/or misrepresented statements about Mr. Bryant that began on or about June 11, 2022, and were published at Ken Bryant Wiki Page to multiple parties in Mr. Bryant's profession/trade, include but are not limited to:

A. "*Apparently he's a scummy realtor too*";

B. By knowingly accessing, copying and publishing non-public Pacer records from a dark-web location when Defendant knew such records were obtained from renowned hacker Aaron Swartz who was found guilty of unauthorized access to private court files electronically stored in an encrypted Public Access to Court Electronic Records, (PACER) depository and scraping and stealing these records. The non-public stolen court records that Defendant knowingly copied and published from this dark-web location included Plaintiff's expunged and vacated records that are no longer publicly accessible in PACER. Defendant published these non-public stolen records under multiple posts, including but not limited to: "*Looks like he's [Mr. Bryant] an admitted whacker, radio pirate and a former convicted felon too!*" ; and

C. "*Bryant may be insane*."

36. Defendants intentional and knowingly false, untrue and/or misrepresented statements about Mr. Bryant that began on or about June 11, 2022, and were published at Federal Agent Wiki Page to multiple parties in Mr. Bryant's profession/trade, include but are not limited to: Publishing stolen non-public court records about Mr. Bryant (*i.e.*, Aaron Swartz's PACER records), including but not limited to, Mr. Bryant's date of birth, North Carolina address, signature, medical records and other private personal information, and engaged in document doxing campaign that encouraged others to harass, embarrass and humiliate Plaintiff causing mental anguish and damage to his business reputation and a call to action to join him in hurting and damaging Plaintiff, including but not limited to, not doing business with him.

37. Defendants' intentional and knowingly false, untrue and/or misrepresented statements about Mr. Bryant that began on or about June 11, 2022, and were published at Fuckhams.com Postings to multiple parties in Mr. Bryant's profession/trade groups or circles, include but are not limited to:

A. "Motorola Dealer!" "*IT'S JUST BEEN REVOKED!*" with Mr. Bryant's picture posted on the "*Motorola Dealership*" frame

; and

B. Defendant commented that the person's photo in the "Revoked" frame was the "*Motorola VP of Channel Partners*" (which is Motorola's term for dealers).

38. For months and continuing as of the filing of this Complaint, Defendants have tarnished Mr. Bryant's reputation by their publications at the Facebook Motorola Group, Ken Bryant Wiki Posts, Federal Agent Wiki Posts, Fuckhams.com Postings, and other publications

not currently known by Mr. Bryant (collectively, "**Defendants' Publications About Mr. Bryant**").

39. Defendants' Publications About Mr. Bryant are statements that are knowingly false, untrue and/or put Mr. Bryant in an unfavorable light, and by suggesting that such disparaging comments were true, the Defendants conveyed the impression that Motorola had revoked Mr. Bryant's radio dealership, which was not true. Further, the Defendants wrongly conveyed that Mr. Bryant's radio dealership was revoked by Motorola for failing to publish pricing (when in fact Motorola policy specifically prohibits the publication of pricing). The Defendants also published Mr. Bryant's private personal information, and was collectively published by Defendants with the intent to harm, which resulted in actual harm, to Mr. Bryant's health and to his professional reputation.

40. Defendants' Publications About Mr. Bryant repeat the aforementioned statements and conclusions, in many different contexts and wording, too many to completely recite without contradicting precepts requiring a short and plain statement of the facts.

41. Defendants' Publications About Mr. Bryant are false and untrue in part because Defendants' analysis of Mr. Bryant's professional career was fundamentally flawed with the goal of damaging Mr. Bryant's reputation and business success.

42. The actions of Defendants, which are more particularly described in Causes of Action I – VIII of this Complaint, were malicious, intentional, oppressive, and outrageous, and evidence a complete callous disregard for the rights of Mr. Bryant.

43. Defendants' Publications About Mr. Bryant exposed Mr. Bryant to distrust, hatred, contempt, ridicule and embarrassment in his customers, professional associates and prospective customers and professional associates.

44. Defendants' Publications About Mr. Bryant damaged the reputation of Mr. Bryant so as to lower Mr. Bryant in the estimation of Mr. Bryant's customers, prospects and business associates and interfere with the relationships between Mr. Bryant and his customers, prospects and business associates.

45. Defendants' Publications About Mr. Bryant were directed by Defendants to Mr. Bryant in the State of North Carolina with the specific intent and knowledge that the publications would damage Mr. Bryant in the State of North Carolina.

46. Defendants' Publications About Mr. Bryant were made by Defendants with actual malice toward the Plaintiff with the specific intent to damage and harm Mr. Bryant.

47. As a result, Mr. Bryant has been disparaged and has sustained damage to his professional reputation within the two way radio community, in which he once maintained an excellent reputation and standing.

48. In addition, Defendants' Publications About Mr. Bryant were made and communicated by Defendants to Mr. Bryant's professional associates, clients and prospective professional associates and clients with the intent that Motorola would terminate Mr. Bryant's radio dealership, and that Mr. Bryant would lose his clients and professional associates and be unable to operate a successful radio dealership.

49. Defendants were able to convince Mr. Bryant's professional associates, clients and prospective professional associates and clients that Defendants' Publications About Mr. Bryant were truthful.

50. Based on its belief that Defendants' Publications About Mr. Bryant were truthful, Mr. Bryant's professional associates, clients and prospective professional associates and clients considered terminating their relationships/agreement(s) with Mr. Bryant.

51. As of the filing of this Complaint, Mr. Bryant continues to be damaged by Defendants' Publications About Mr. Bryant and Defendants' wrongful interference with Mr. Bryant's contracts with radio professionals and prospective relationships with such professionals.

52. As a direct and proximate result of Defendants' conduct, Mr. Bryant has suffered actual damages.

53. The Plaintiff attempted repeatedly to resolve this matter with the Defendants prior to filing this action; nevertheless, the Defendants refused to cease and desist their offensive and libelous behavior and refused to remove the offensive publications, and taunted the Plaintiff publicly and privately to bring legal action against them, thereby necessitating the filing of this action.

54. All conditions precedent to this action have occurred, or have been waived or excused.

IV. CLAIMS FOR RELIEF

FIRST CAUSE OF ACTION
(North Carolina Defamation/Libel *Per Se*)

55. The Plaintiff repeats and realleges all the allegations contained in the preceding paragraphs as if the same were set forth at length herein.

56. Defendants' Publications About Mr. Bryant were knowingly made and delivered by Defendants to third parties constituting libel *per se* under the laws of North Carolina.

57. Without innuendo or explanation, Defendants' Publications About Mr. Bryant tend to impeach Plaintiff in his trade or profession, allege that he committed an infamous crime and otherwise subject Mr. Bryant to contempt or disgrace.

58. Such impeachment of Mr. Bryant in his trade or profession, as stated in Defendants' Publications About Mr. Bryant, include but are not limited to such statements identified and summarized in Paragraphs 33-37 and those other statements not known currently to Mr. Bryant.

59. Defendants' Publications About Mr. Bryant are susceptible of but one meaning and are of such nature that they tend to disgrace and degrade Mr. Bryant, or hold Mr. Bryant up to public hatred, contempt, or ridicule, or cause Mr. Bryant to be shunned or avoided, and are libelous *per se*, or when considered with innuendo, colloquium, and explanatory circumstances are libelous.

60. These alleged false, untrue, and misleading statements in Defendants' Publications About Mr. Bryant when construed only in the context of such publications in which they are contained, stripped of all insinuations and innuendo, are defamatory on their face.

61. Defendants' Publications About Mr. Bryant are false, untrue, and misrepresented statements of or concerning Mr. Bryant and were viewed and believed by Mr. Bryant's customers, professional associates and prospective customers and professional associates, and have been shared with foreseeably unknown number of other third parties.

62. Defendants' Publications About Mr. Bryant were knowingly made by Defendants to be false, untrue and contain significant misrepresentations of Mr. Bryant and his career.

63. Such false and significant misrepresentations of Mr. Bryant's career were made by Defendants in Defendants' Publications About Mr. Bryant were misrepresentations that actually changed the meaning of Mr. Bryant's career.

64. Upon information and belief, the untruthful, false, and misleading statements identified in Paragraphs 33-37 and elsewhere as alleged in the Complaint have caused damages to Mr. Bryant were made or significantly altered by Defendants as early as April 30, 2022.

65. Defendants' Publications About Mr. Bryant and such alterations to the actual career of Mr. Bryant made by Defendants resulted in damages to Mr. Bryant, including but not limited to, lost creditability, lost reputation, lost wealth, lost customers, lost benefits and incurred fees and expenses arising from this lawsuit and other related damages and injuries to be proven at trial by Mr. Bryant.

66. Additionally, Defendants knowingly refused to correct the untruthful, false, and misleading statements identified in Paragraphs 33-37 and elsewhere as alleged in the Complaint that have caused damages to Mr. Bryant, and upon information and belief, Defendants continues to make false and misleading statements about Mr. Bryant in order to provide false-creditability to Defendants' Publications About Mr. Bryant or enhance the false and misleading statements about Mr. Bryant in Defendants' Publications About Mr. Bryant.

67. Upon information and belief, Defendants' acts as alleged in this Complaint may have been in concert with other third parties, joined together with the joint purpose and material intent, and acted for and as actual and apparent agents of each other, and conspired together for the common cause and purpose of committing the acts that substantially injured Mr. Bryant.

68. Defendants' alleged acts complained of herein are ongoing and continuous, and committed with the required intent for libel *per se* cause of action under the laws of North Carolina.

69. As a direct result of Defendants' Publications About Mr. Bryant, Mr. Bryant has suffered actual damages to the reputation, regard, esteem, and goodwill associated with his

personal and professional names, in an amount more than Twenty-Five Thousand Dollars ($25,000). and less than Seventy-Five Thousand ($75,000), to be proven at trial by Mr. Bryant.

70. Mr. Bryant has suffered special damages as a result of Defendants' alleged conduct as alleged herein and to be proven at trial by Mr. Bryant, which special damages include but are not limited to Mr. Bryant's pecuniary loss, including the loss of his customers and prospective customers, and other related special damages as a result of Defendants' conduct as alleged herein this Complaint.

71. Further, the Plaintiff has sustained presumed damages. Renwick v. News & Observer Pub. Co., 310 N.C. 312, 313, 312 S.E.2d 405, 406 (1984) ("When an unauthorized publication is libelous *per se*, malice and damage are presumed from the fact of publication and no proof is required as to any resulting injury. The law presumes that general damages actually, proximately and necessarily result from an unauthorized publication which is libelous per se and they are not required to be proved by evidence since they arise by inference of law, and are allowed whenever the immediate tendency of the publication is to impair plaintiff's reputation, although no actual pecuniary loss has in fact resulted.").

72. The actions of Defendants in making the libelous statements about Mr. Bryant were done for the dual purposes of damaging Mr. Bryant, and interfering with Mr. Bryant's relationships with his customers, professional associates and prospective customers and professional associates.

73. As a direct result of Defendants' actions, Mr. Bryant has suffered irreparable harm, substantial financial losses, and damage to his personal and professional reputations.

74. Defendants' actions were malicious, intentional, oppressive, and outrageous, and evidence a complete callous disregard for the rights of Mr. Bryant.

75. Mr. Bryant is entitled to have and recover from Defendants punitive damages for Defendants' willful and malicious libel *per se* statements, and an award of attorney's fees.

76. As a direct result of Defendants' actions, Mr. Bryant has suffered great losses, and unless and until Defendants' actions are enjoined, Mr. Bryant will continue to suffer actual damages and irreparable harm to his professional reputations.

77. Mr. Bryant has no adequate remedy at law.

SECOND CAUSE OF ACTION
(In the Alternative, Defamation/Libel Per Quod)

78. Mr. Bryant repeats and realleges all the allegations contained in the preceding paragraphs as if the same were set forth at length herein.

79. Defendants' Publications About Mr. Bryant and other published statements identified herein were false, untrue, or misrepresented statements or concerning Mr. Bryant and his businesses, which were made to Mr. Bryant's customers, professional associates and prospective customers and professional associates and subsequently thereafter to an unknown number of other third parties, that have caused injury and damages to Mr. Bryant, as set forth herein.

80. Defendants' Publications About Mr. Bryant and other statements identified herein when considered with innuendo, colloquium, and explanatory circumstances become libelous and caused damages to Mr. Bryant.

81. Defendants knowingly made these libel per quod statements to third persons/parties.

82. Upon information and belief, Defendants' Publications About Mr. Bryant include Defendants' knowingly significant alterations to the actual career of Mr. Bryant.

83. Such significant alterations made by Defendants about the career of Mr. Bryant were alterations that actually changed the meaning of Mr. Bryant' career.

84. Defendants knowingly refused to correct the untruthful, false, and misleading statements identified in Paragraphs 33-37 and elsewhere as alleged in the Complaint that have caused damages to Mr. Bryant, and upon information and belief, continues to make false and misleading statements about Mr. Bryant in order to provide false creditability to Defendants' Publications About Mr. Bryant or enhance the false and misleading statements about Mr. Bryant in Defendants' Publications About Mr. Bryant.

85. As set forth in Defendants' Publications About Mr. Bryant and the identified and referenced herein this Complaint, Defendants' statements about Mr. Bryant were intended by Defendants to be defamatory to Mr. Bryant' reputation.

86. Upon information and belief, the untrue, false and misleading statements identified in Paragraphs 33-37 and identified and referenced elsewhere in this Complaint that have caused damages to Mr. Bryant and his reputations were significantly altered by Defendants as early as on or about April 30, 2022.

87. Upon information and belief, Defendants' alleged acts as alleged in this Complaint may have been in concert with other third parties, joined together with the joint purpose and material intent, and acted for and as actual and apparent agents of each other, and conspired together for the common cause and purpose of committing the acts that substantially injured Mr. Bryant.

88. Defendants' acts complained of herein are ongoing and continuous, and committed with the required intent to for libel per quod cause of action under the laws of North Carolina.

89. Mr. Bryant has suffered special damages as a result of Defendants' alleged conduct as alleged herein and to be proven at trial by Mr. Bryant, which special damages include but are not limited to Mr. Bryant' pecuniary loss, and other related special damages as a result of Defendants' conduct as alleged herein this Complaint.

90. The actions of Defendants in making the libelous statements about Mr. Bryant was done for the dual purposes of damaging Mr. Bryant and his businesses and to generate new business for Defendants' competing colleagues and other competitors of Mr. Bryant.

91. As a direct result of Defendants' actions, Mr. Bryant has suffered irreparable harm, substantial financial losses, and damage to his personal and professional reputations.

92. Defendants' actions were malicious, intentional, oppressive, and outrageous, and evidence a complete callous disregard for the rights of Mr. Bryant.

93. Mr. Bryant is entitled to have and recover from Defendants punitive damages for Defendants' willful and malicious libel per quod statements, and an award of attorney's fees.

94. As a direct result of Defendants' actions, Mr. Bryant has suffered great losses, and unless and until Defendants' actions are enjoined, Mr. Bryant will continue to suffer actual damages and irreparable harm to his professional reputations.

95. Mr. Bryant has no adequate remedy at law.

THIRD CAUSE OF ACTION
(Wrongful Interference with Contract – Motorola Dealership Agreement)

96. Mr. Bryant repeats and realleges all the allegations contained in the preceding paragraphs as if the same were set forth at length herein.

97. Upon information and belief, during all material times as alleged in this Complaint, (i) Defendants knew that Mr. Bryant entered into a dealership agreement with

Motorola, Inc.: (ii) this dealership agreement was, and is, a valid contract between Mr. Bryant and Motorola that grants to Mr. Bryant a certain rights to be an authorized dealership to sell Motorola radios to businesses and consumers; (iii) Defendants' wrongful and intentional acts as alleged herein this Complaint induced Mr. Bryant's customers and professional associates to cease using Mr. Bryant for their Motorola radio needs that interfered with the benefits of this Motorola dealership contract; (iv) Defendants acted without justification and for their own self-interests, and upon information and belief, Defendant Fields' employer Nokia and other competing radio dealerships, and Defendant Gallini's CJ Radio Solutions business; and (v) Mr. Bryant suffered actual damages as a result of Defendants' actions as alleged herein this Complaint.

98. Upon information and belief, during all material times as alleged in this Complaint, Defendants knew that Motorola did not revoke Mr. Bryant's Motorola dealership.

99. Defendants' Publications About Mr. Bryant and other statements alleged herein this Complaint discouraged Mr. Bryant's customers and professional associates and other third parties from doing business with Mr. Bryant.

100. Defendants' Publications About Mr. Bryant and other statements alleged herein were believed by Mr. Bryant's customers and professional associates and other third parties that Mr. Bryant's Motorola dealership agreement was revoked by Motorola, and such customers, professional associates and other third parties did business and other engagements with other Motorola dealerships, and not with Mr. Bryant's Motorola dealership.

101. Defendants' conduct as alleged in this Complaint intentionally induced third parties no to perform, or interfered with, Mr. Bryant's Motorola dealership contract.

102. Defendants' Publications About Mr. Bryant and other statements alleged herein deprived Mr. Bryant of the contractual benefits of his Motorola dealership agreement.

103. Defendants' Publications About Mr. Bryant and other statements alleged herein deprived Mr. Bryant of the contractual benefits of his Motorola dealership agreement, causing Mr. Bryant's customers and professional associates and other third parties from not entering into agreements, or continue business relations, with Mr. Bryant since they believed that Mr. Bryant's Motorola dealership agreement was revoked by Motorola.

104. Defendants acted without justification in inducing Mr. Bryant's customers and professional associates from using Mr. Bryant for their Motorola radio needs, which benefit of the Motorola agreement would not have been compromised but for such Defendants' wrongful interference.

105. The actions of Defendants in directing prospective customers and professional associates away from Mr. Bryant and his businesses and toward competitors of Mr. Bryant and his businesses were done for the dual purposes of damaging Mr. Bryant and his businesses and to generate new business for Defendants' competing colleagues and other competitors of Mr. Bryant.

106. Upon information and belief, Defendants' alleged acts as alleged in this Complaint may have been in concert with other third parties, joined together with the joint purpose and material intent, and acted for and as actual and apparent agents of each other, and conspired together for the common cause and purpose of committing the acts that substantially injured Mr. Bryant and to damage and interfered with his agreement with Motorola.

107. Defendants' alleged acts complained of herein are ongoing and continuous, and committed with the required intent to violate North Carolina wrongful interference with contract common law.

108. As a direct and proximate result of the wrongful interference by Defendants with Mr. Bryant' Motorola dealership agreement, Mr. Bryant has suffered actual damages in an amount more than Twenty-Five Thousand Dollars ($25,000.00) by his: lost creditability, lost reputation, lost wealth, lost customers, lost income, and related lost benefits, and incurred fees and expenses arising from this lawsuit and other related damages to be proven at trial by Mr. Bryant.

109. Mr. Bryant is entitled to have and recover from the Defendants in an amount more than Twenty-Five Thousand Dollars ($25,000.00) for wrongful interference with his Motorola dealership agreement.

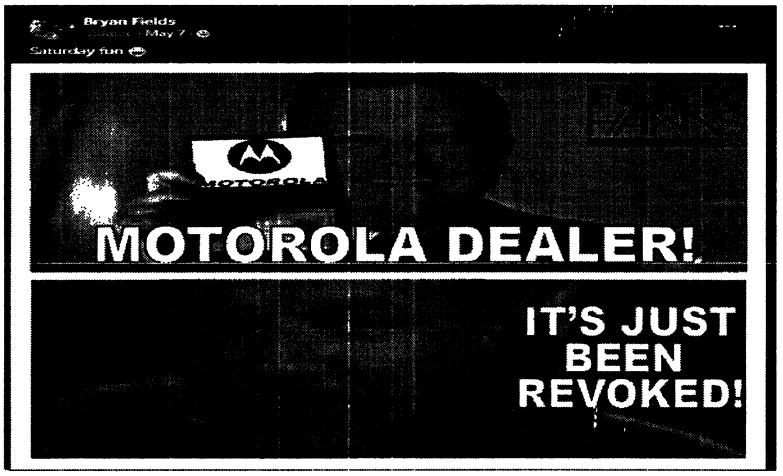
FOURTH CAUSE OF ACTION
(Tortious Interference with Prospective Economic Advantage)

110. Mr. Bryant repeats and realleges all the allegations contained in the preceding paragraphs as if the same were set forth at length herein.

111. Upon information and belief, Defendants' Publications About Mr. Bryant were intentionally published by Defendants in Mr. Bryant's profession/trade websites, social media sites and/or blogs so that on or about June 11, 2022, Mr. Bryant's customers, professional associates and prospective customers and professional associates were able to find Defendants' Publications About Mr. Bryant and view and believe their content.

112. In this regard, Defendants Publications About Mr. Bryant, including but not limited to:

A. "Motorola Dealer!" "IT'S JUST BEEN REVOKED!" with Mr. Bryant's picture posted on the "Motorola Dealership" frame



; and

B. Defendants commented that the person's photo in the "Revoked" frame was the "Motorola VP of Channel Partners" (which is Motorola's term for dealers)

113. Collectively, Defendants who published Defendants' Publications About Mr. Bryant discouraged prospective customers and professional associates from doing business with Mr. Bryant and his businesses and encouraged them to do business with other radio dealerships, including Defendants' employer Nokia and other Motorola radio dealerships.

114. Collectively, Defendants who published Defendants' Publications About Mr. Bryant acted without justification in inducing Mr. Bryan's prospective customers and professional associates to refrain from entering into a contract, or working with, Mr. Bryant and his businesses, which contract and/or relationship would have ensued but for such Defendants' interference.

115. Upon information and belief, Defendants have collectively discouraged other prospective customers and professional associates of Mr. Bryant from doing business with Mr.

Bryant and his businesses and instead directed those prospective customers and prospective associates to competitors of Mr. Bryant.

116. The actions of Defendants in directing prospective customers and professional associates away from Mr. Bryant and his businesses and toward competitors of Mr. Bryant and his businesses were done for the dual purposes of damaging Mr. Bryant and his businesses and to generate new business for Defendants' competing colleagues and other competitors of Mr. Bryant.

117. Defendants' alleged acts complained of herein are ongoing and continuous, and committed with the required intent to violate North Carolina tortious interference with prospective economic advantage.

118. As a direct and proximate result of the interference by Defendants with the prospective economic advantage of Mr. Bryant and his businesses, Mr. Bryant has suffered actual damages in an amount in excess of Twenty-Five Thousand Dollars ($25,000.00) by his: (i) loss of contract from current customers (identities remain confidential); (ii) all other prospective customers and professional associates users (identities remain confidential) who read Defendants' Publications About Mr. Bryant who were induced to refrain from entering into a contract with Mr. Bryant, or associate with him, that would have ensued but for Defendants' interference; (iii) all other prospective customers and professional associates who read some or all of Defendants' Publications About Mr. Bryant as alleged herein who were induced to refrain from entering into a contract with Mr. Bryant, or associate with him, that would have ensued but for Defendants' interference; and (iv) loss by other means not known currently to Mr. Bryant.

119. Mr. Bryant is entitled to have and recover from the Defendants in an amount more than Twenty-Five Thousand Dollars ($25,000.00) for tortious interference with prospective economic advantage.

FIFTH CAUSE OF ACTION
(Intentional Infliction of Emotional Distress)

120. Mr. Bryant repeats and realleges all the allegations contained in the preceding paragraphs as if the same were set forth at length herein.

121. Defendants' conduct, including but not limited to posting false and incredibly derogatory statements regarding Mr. Bryant, was intentional and/or reckless, and was, and is, extreme and outrageous conduct.

122. Additionally, Defendants' Publications About Mr. Bryant were outrageous and/or intolerable, and so extreme as to go beyond all possible bounds of decency.

123. Defendants' conduct as alleged in this Complaint was intended to and does in fact, cause severe emotional distress to Mr. Bryant.

124. As a direct result of this conduct by Defendant, Mr. Bryant has suffered severe emotional distress where Mr. Bryant has incurred damages to his mental health, physical health and incurred related medical expenses arise from Defendants' extreme and outrageous conduct as alleged in this Complaint.

SIXTH CAUSE OF ACTION
(Unreasonable Intrusion Upon the Seclusion of Another)

125. Mr. Bryant repeats and realleges all the allegations contained in the preceding paragraphs as if the same were set forth at length herein.

126. Since as early as 2015 Defendant Fields has an extensive history of defaming others, engaging in document doxing campaigns and interfering with the contractual and

business affairs of individuals and organizations (each an "**information warfare and document doxing campaign**").

127. As alleged in this Complaint, beginning in May of 2022, Defendants began an information warfare and document doxing campaign against Mr. Bryant.

128. Defendants intruded upon the privacy of Mr. Bryant by knowingly and intentionally accessing, copying and publishing non-public court records that Defendants knew were scraped and stolen by hacker Aaron Swartz's unauthorized access to the federal court system's PACER database which included private, non-public records.

129. In 2011, Swartz was arrested, charged and indicted in various jurisdictions on charges of breaking and entering with intent to commit a felony, grand larceny, and unauthorized access to a computer network. Swartz was also later indicted by a federal grand jury on charges of wire fraud, computer fraud, unlawfully obtaining information from a protected computer, and recklessly damaging a protected computer. In 2012, federal prosecutors filed a superseding indictment adding nine more felony counts, increasing Swartz's maximum criminal exposure to 50 years of imprisonment, asset forfeiture, restitution and $1 million in fines. Before Swartz could stand trial, he committed suicide by hanging in 2013.

130. The non-public court records of Mr. Bryant that Defendants published contained private personal information, including but not limited to, Mr. Bryant's date of birth, North Carolina address, signature, medical records, photograph and other private personal information.

131. Defendants' intrusion was intentional, done knowingly and with purpose and reckless indifference to its consequences.

132. Pursuant to G.S. § 14-196.3(b)(2). it is unlawful to "Electronically mail or electronically communicate to another repeatedly, whether or not conversation ensues, for the purpose of abusing, annoying, threatening, terrifying, harassing, or embarrassing any person."

133. Pursuant to G.S. § 1-14-196.3(a)(1), "electronic communication" is defined as "Any transfer of signs, signals, writing, images, sounds, data, or intelligence of any nature, transmitted in whole or in part by a wire, radio, computer, electromagnetic, photoelectric, or photo-optical system."

134. Defendants' conduct as described herein, and in particular the Defendants' posting of false information pertaining to Mr. Bryant and pertaining to Mr. Bryant's personal and sensitive biographical information, such as date of birth, and posting of court records which were vacated and never public, violate G.S. § 14-196.3, and thereby constitute actionable conduct contrary to the public policy of the State of North Carolina.

135. Pursuant to G.S. § 14-277.3A(c), it is unlawful to "harasses another person without legal purpose or willfully engages in a course of conduct directed at a specific person without legal purpose and the defendant knows or should know that the harassment or the course of conduct would cause a reasonable person to . . . Suffer substantial emotional distress by placing that person in fear of death, bodily injury, or continued harassment."

136. Pursuant to G.S. § 14-277.3A(b)(1), a "course of conduct" is defined as "Two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties. by any action, method, device, or means, is in the presence of, or follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property."

1235 (D.C. Cir. 1979) ("Their [the authors of the Youth Corrections Act] primary concern was that rehabilitated youth offenders be spared the far more common and pervasive social stigma and loss of economic opportunity that in this society accompany the 'ex-con' label. While the legislative history offers little guidance as to the reasoning behind the drafters' choice of terminology, it is crystal-clear in one respect: they intended to give youthful ex-offenders a fresh start, free from the stain of a criminal conviction, and an opportunity to clean their slates to afford them a second chance, in terms of both jobs and standing in the community."); People v. Garcia, 93 Misc. 2d 667, 670, 402 N.Y.S.2d 164, 167 (1978) ("Its purpose was to provide young people with an opportunity to begin anew without encumbering them with the stigma of a criminal conviction.").

162. In fact, the Government did not file charges until Mr. Bryant embarrassed the Federal Bureau of Investigation ("FBI") pertaining to the lack of security employed by the FBI pertaining to its radio communications. It should be noted that these non-public records were almost 40 years old and that the Defendants went through great lengths in locating and publishing them.

163. At the same time, and for a period of years, the Drug Enforcement Administration ("DEA") recognized that Mr. Bryant provided it with intelligence pertaining to the distribution of illegal drugs and that Mr. Bryant consulted with the DEA regarding technical matters including communications security. Further, the DEA found Mr. Bryant to be "honest, competent, truthful, trustworthy, of good character, and bears a reputation for fair dealing," and that Mr. Bryant was a "law-abiding citizen" who was a "very perceptive, aware individual who exercised discretion and good judgment in sensitive situations." See notarized affidavit attached hereto as **Exhibit 9**.

137. Pursuant to G.S. § 14-277.3A(b)(2), "harassment" is defined as "Knowing conduct, including written or printed communication or transmission, telephone, cellular, or other wireless telephonic communication, facsimile transmission, pager messages or transmissions, answering machine or voice mail messages or transmissions, and electronic mail messages or other computerized or electronic transmissions directed at a specific person that torments, terrorizes, or terrifies that person and that serves no legitimate purpose"

138. Defendants' conduct as described herein, and in particular the Defendants' posting of false information pertaining to Mr. Bryant and pertaining to Mr. Bryant's personal and sensitive biographical information, such as date of birth, and posting of court records which were vacated and never public, violate G.S. § 14-277.3A, and thereby constitute actionable conduct contrary to the public policy of the State of North Carolina.

139. A reasonable person would be highly offended under similar circumstances.

140. Mr. Bryant has suffered both actual and nominal damages as a result of Defendants' unreasonable intrusion upon the seclusion of Plaintiff.

SEVENTH CAUSE OF ACTION
(Appropriation of Another's Name and Likeness)

141. Mr. Bryant repeats and realleges all the allegations contained in the preceding paragraphs as if the same were set forth at length herein.

142. Defendants appropriated Mr. Bryant's name and likeness for Defendants' own commercial benefit.

143. Defendants' unauthorized use of Mr. Bryant's name and likeness, includes but is not limited to, his name, photograph of Mr. Bryant, Mr. Bryant's reputation, Mr. Bryant's professional/industry standing and other values of Mr. Bryant.

144. Defendants used Mr. Bryant's name and likeness for their own commercial advantage and that of their associates and colleagues to compete with Plaintiff for the sale of two way radios.

145. Mr. Bryant did not consent to Defendants' appropriation of his name and likeness.

146. Mr. Bryant has suffered both actual and nominal damages as a result of Defendants' appropriation of Mr. Bryant's name and likeness.

EIGHTH CAUSE OF ACTION
(Violations of North Carolina's Unfair and Deceptive Trade Practice Act)

147. Mr. Bryant repeats and realleges all the allegations contained in the preceding paragraphs as if the same were set forth at length herein.

148. Mr. Bryant asserts this claim for relief against Defendants pursuant to North Carolina Unfair and Deceptive Trade Practices Act ("**UDTPA**").

149. Mr. Bryant, as a Motorola radio dealer, and Defendant Fields, as an employee of Nokia, are, in some aspects direct competitors of related products.

150. Mr. Bryant and Defendants are active professionals in the radio industry, including but not limited to, communicating with their customers, professional associates and prospective customers and professional associates via the Facebook Motorola Group, Ken Bryant Wiki Posts, Federal Agent Wiki Posts, Fuckhams.com Posts and other venues for radio businesses and customers.

151. The unfair and deceptive actions of Defendants were in or affecting commerce within the meaning of Chapter 75 of the North Carolina General Statutes in that his actions as described in this Complaint affected business relationships between Mr. Bryant and his customers, professional associates and prospective customers and professional associates.

152. Upon information and belief, Defendants have the ability and financial incentive to financially prosper by taking business away from Mr. Bryant.

153. Upon information and belief, Defendants have acquaintances that are in the two way radio business and have the ability and financial incentive to financially prosper by taking business away from Mr. Bryant.

154. The actions of Defendants as described in this Complaint were unfair in that they made use of resources available to him and employed an information warfare, as alleged in this Complaint, against Bryant in order to punish, deceptively gain something of value from Mr. Bryant, and unfairly compete against Mr. Bryant for as alleged *inter alia*, including but not limited to:

A. By participating in the allegations alleged in the First Cause of Action alleged in this Complaint;

B. By participating in the allegations alleged in the Second First Cause of Action alleged in this Complaint;

C. By participating in the allegations alleged in the Third First Cause of Action alleged in this Complaint;

D. By participating in the allegations alleged in the Fourth First Cause of Action alleged in this Complaint;

E. By participating in the allegations alleged in the Fifth Cause of Action alleged in this Complaint;

F. By participating in the allegations alleged in the Sixth Cause of Action alleged in this Complaint;

G. By participating in the allegations alleged in the Seventh Cause of Action alleged in this Complaint; and

H. In other respects, not known currently to Mr. Bryant, to be a Public Access to Court Electronic Records, (PACER) adduced through discovery and at trial.

155. The actions of Defendant Fields was deceptive in that, while he was in a position of trust and confidence as an administrator of the Facebook Motorola Group with responsibilities to Mr. Bryant as a member of the group, he knowingly and willfully engaged in acts of publishing false, untrue and/or misleading statements about Mr. Bryant via Defendants' Publications About Mr. Bryant in order to damage the status of Mr. Bryant with Mr. Bryant's customers, professional associates and prospective customers and professional associates, at Mr. Bryant's expense, as more fully alleged in this Complaint.

156. The role of a Facebook Administrator and Moderator is to enforce group rules as well as to ensure Facebook Community Standards are maintained (including the prohibition of shaming and embarrassing of others).

The actions of Defendant Fields were deceptive in that, while he was in a position of trust and confidence with responsibilities to its readership and members, and as an administrator or moderator of the Ken Bryant Wiki Posts, Federal Agent Wiki Posts and Fuckham.com Posts, and possibly other venues not currently known by Mr. Bryant, Defendant Fields published statements that are statements that are knowingly false, untrue and/or put Mr. Bryant in an unfavorable light, and by suggesting that such disparaging comments were true, Motorola had revoked Mr. Bryant's radio dealership.

157. The actions of Defendants were intended to harm and damage Mr. Bryant, which conduct resulted in actual harm to Mr. Bryant in his profession and reputation, as more fully alleged in this Complaint.

158. Defendants' purpose for such unlawful conduct was to: (1) damage Mr. Bryant's reputation in his profession and personal life, (2) divert business away from Mr. Bryant to himself, other Motorola radio dealerships, and other competitors of Mr. Bryant that are unknown currently to Plaintiff, (3) convert Mr. Bryant's contractual benefit (a good standing Motorola dealership that has not suffered damages from trade libel) for his own financial and business benefit, (4) as retribution against Mr. Bryant; and (5) for other purposes currently unknown to Mr. Bryant.

159. As explained heretofore, the Defendants' actions violate G.S. § 14-196.3 and violate G.S. § 14-277.3A(c), in that they constitute harassment and stalking, and are done for no legitimate purpose.

160. The public posting of court records which were stolen and which had been vacated is contrary to public policy, as the Governmental intent was to maintain such records as private and not accessible, and a person's agreement to a plea deal pursuant to this provision of law is in reliance on said documents being and remaining confidential and private.

161. The public policy behind the Youth Corrections Act, pursuant to which the federal court record at issue was vacated and removed from the public realm, is to allow the person charged with a crime to resume his life without the stigma of a criminal conviction. *See, e.g.*, People v. Wunnenberg, 85 Ill. 2d 188, 191, 421 N.E.2d 905, 907 (1981) ("there is a clear consensus of opinion in the cited cases that a set-aside conviction under the Youth Corrections Act should not burden the youth offender later in life"); Doe v. Webster, 606 F.2d 1226, 1234-

164. Mr. Bryant had an expectation of privacy about this matter especially due to his status as a former confidential informant and as a former federal agent.

165. On April 22, 1968, the Attorney General for the State of Florida issued a legal opinion based on Federal Law stating, "There is no question that the vacation of a conviction in Florida serves to totally and wholly eliminate the conviction and restore the parties to their status prior to conviction. Adelhelm v. Dougherty (1937) 129 Fla. 680, 176 So. 775. Unlike the effect of a pardon, a vacation of conviction will restore to a party any rights, properties or offices lost as a result of the conviction. Revell v. Dishong (1937) 129 Fla. 9, 175 So. 905."

166. This official opinion further states, "The vacation pursuant to Title 18 USC Section 5021 is a true vacation of conviction and is actually of wider application and more valuable to a convicted party that a Presidential Pardon."

167. As a result of Defendants' actions, Mr. Bryant has been injured in the following ways: (1) incurring technical and legal expenses to investigate the allegations alleged in this Complaint, (2) healthcare expenses; (3) increased advertising and marketing expenses; and (4) other monetary losses currently unknown to Mr. Bryant.

168. Defendants' actions complained of herein were conscious, intentional, wanton, willful and malicious entitling Mr. Bryant to an award of treble damages.

169. Pursuant to North Carolina law, Mr. Bryant is entitled to relief for the violations of the UDTPA by Defendant.

170. Mr. Bryant has no adequate remedy of law for the continued violation of the UDTPA by Defendant.

171. Mr. Bryant seeks to recover its preliminary and permanent injunctions to cease such unlawful actions, and actual damages suffered as a result of Defendants' conduct.

172. Mr. Bryant is also eligible for and seeks an award of treble damages and attorneys' fees and reimbursement of its litigation costs.

PRAYER FOR RELIEF

Wherefore, for the foregoing reasons, the Plaintiffs asks that the Court issue citation for Defendants to appear and answer, and that Mr. Bryant be awarded a judgment against Defendants for the following:

A. For a trial by jury on all issues contained in this Complaint.

B. For compensatory damages in an amount to be determined by the finder of fact, but in any event, to the extent Rule 8(a)(2) of the North Carolina Rules of Civil Procedure is applicable, in an amount more than Twenty-Five Thousand Dollars ($25,000), and not in excess of Seventy-Five Thousand Dollars ($75,000).

C. For compensation in an amount to be determined by the finder of fact, but in any event, for his economic and non-economic injuries and damages more than Twenty-Five Thousand Dollars ($25,000), and not in excess of Seventy-Five Thousand Dollars ($75,000), as provided under defamation *per se* law.

D. For compensation in an amount to be determined by the finder of fact, but in any event, for his economic and non-economic injuries and damages more than Twenty-Five Thousand Dollars ($25,000.00), and not in excess of Seventy-Five Thousand Dollars ($75,000), as provided under defamation law and wrongful interference with contract law.

E. For special damages in an amount to be determined by the finder of fact, but in any event, in an amount more than Twenty-Five Thousand Dollars ($25,000), and not in excess of Seventy-Five Thousand Dollars ($75,000), for Mr. Bryant' pecuniary loss as provided in

Stutts v. Duke Power, 47 N.C. App. 76, 266 S.E.2d 861 (1980) for all of his special damages under defamation law.

F. For punitive damages for the information warfare and document doxing campaign. including but not limited to, publishing and making defamatory statements of or about Mr. Bryant with knowledge of such defamatory statements' falsity or with reckless disregard for the truth and publishing non-public court records and other private personal information about Mr. Bryant to harm and damage Plaintiff in an amount to be determined by the finder of fact, but in any event. in an amount in excess of Twenty-Five Thousand Dollars ($25,000.00), and not in excess of Seventy-Five Thousand Dollars ($75,000), to punish Defendants and deter similar future conduct.

G. For an order directing the Plaintiffs to remove all libelous postings.

H. For nominal damages in recognition of the technical damage caused by the wrongful conduct of Defendant as provided under N.C.P.I. – Civ. 800.71. *Flake v. Greensboro News Co.*, 212 N.C. 780, 195 S.E. 55 (1938); *Barr v. S. Bell Tel. & Tel. Co.*, 13 N.C. App. 388, 185 S.E.2d 714 (1972).

VERIFICATION

Kenneth Bryant, first being duly sworn, deposes and says that he is the Plaintiff in this civil action, that he has read the foregoing Complaint, and that the same are true of his own knowledge except as to those matters therein stated upon information and belief, and as to those matters, he believes them to be true.

Kenneth Bryant

Kenneth Bryant

Sworn to and subscribed before me

this the 5th day of December, 2022.

Notary Public

My Commission Expires: 3/16/2023

WENDY SHOOK NOTARY PUBLIC CLAY COUNTY, NC

I. For reasonable attorneys' fees and other litigation costs reasonably incurred by Mr. Bryant as provided under N.C. Gen. State § 6-21.5 and other applicable statutes.

J. The total compensation sought by the Plaintiff in this action does not exceed Seventy-Five Thousand Dollars ($75,000)

K. For such pre- and post-judgment interest as permitted by law; and

L. For such other relief as the Court deems necessary or proper.

Respectfully submitted, this the __ day of December, 2022.

John M. Kirby
Law Offices of John M. Kirby, PLLC
4801 Glenwood Ave., suite 200
Raleigh, NC 27612-3856
919-861-9050
Counsel for Plaintiff

Exhibit 1

1. A SAMPLE OF BRIAN DONALD FIELDS' CYBERSMEAR CAMPAIGNS:

A. FRC

Regarding the FRC dispute, which occurred between an unknown date in 2015 to approximately July 6, 2017, Fields generally disputed with the board for "*operating outside of the Corporation's legal boundaries.*" At www.frcreform.org, he **specifically named and doxed** the following board members' information:

- Board of Directors (frcreform.org)
  - Glenn Mike Fletcher
  - Dana Rodakis
  - Chuck Lavender
  - Ralph Betts
  - Norman C. Scholer
  - Steve Lowman
  - Doug Stewart
  - Jame Deuel
  - Mark Filla
  - Joaquin A Pidal
  - Barry M. Isbelle

NOTE: According to https://fasma.org/2017/07/, "The FRC Reform caucus (http://frcreform.org) was started in 2015 by Bryan Fields W9CR."

B. AllStarLink (ASL)

Regarding the AllStarLink dispute, which occurred between an unknown date and December 2019, Fields generally disputed with the board. In one of his comments located at https://community.allstarlink.org/t/allstarlink-quickly-moving-from-tampa/15770, he stated "*Pete, you and the rest of the AllStarLink board are by far, some of the most incompetent and devious fucks I've had the displeasure to know.*" It's uncertain exactly who was part of the ASL board in 2019. However, according to the above link and the YouTube video reported below, it appears the following people were board members:

- Pete Elke (WI6H)
  - Board Member and ASL Admin
- Kevin Custer (W3KKC)
  - Board Member
- Tim Sawyer (WD6AWP)
  - Board Member and ASL Community Admin
- Todd Lesser (KM6RPT)
  - Board Member
- John David McGough (KB4FXC)

    - Possible Board Member, according to YouTube video (www.youtube.com/watch?v=9ONwmEjN8VI)
- Steve Zingman
    - Possible Board Member, according to YouTube video (www.youtube.com/watch?v=9ONwmEjN8VI)

Fields also created a video titled "*Why I stopped supporting AllStarLink*" (35:39) located at www.youtube.com/watch?v=9ONwmEjN8VI. In it, he speaks about his split from ASL and **negatively speaks about specific people**, organizations, and companies, as follows:

- Generally insults AllStarLink
    - Cautions people against getting involved with ASL and donating to them
- Mentioned at least Steve Zingman, Kevin Custer, Todd Lesser, Pete Elke, Tim Sawyer by name
- Stated *John David McGough stole source code* and is a "*software pirate*", 8:10
    - Spoke negatively about McGough's company IntTek
- HAMVOIP, expletive-ridden rant, 20:25
- Mike (possibly Zingman, N4IRR) "absolute bull in a china shop, total idiot", 28:40
    - Mike is probably relative of Steve Zingman

NOTE: John McGough and Todd Lesser also have Wiki pages created about them on www.wiki.w9cr.net, discussed further below.

C. ARDC

Regarding the ARDC dispute, which occurred between approximately mid-2019 to an unknown date, Fields did not amicably part ways with the organization when it sold one quarter of its IP space to Amazon. Although not necessarily maliciously, he did write in an email about then ARDC President Phil Karn (1st link), claimed guilt among all ARDC board members for selling IP space to Amazon, and made other disparaging remarks about ARDC (3rd link), as follows:

- https://www.reddit.com/r/amateurradio/comments/cf2cbo/comment/eu7bz5q
    - Comments about a message he received from ARDC President Phil Karn
- https://mail.hamwan.org/pipermail/psdr/2020-June/002937.html
- https://lists.keekles.org/pipermail/44-reform/2019-September/000004.html
    - He wrote "*ARDC has now given 110k to ARISS. I've asked ARISS if they condone ARDC by accepting this fraudulently obtained funding.*"

D. Other Disputes

Although already mentioned within the ASL dispute above, these people and organizations warrant mentioning as their own dispute due to Fields' added emphasis about them, as follows:

- **HAMVOIP** – In the YouTube video listed above, at time 20:25, Fields includes an expletive-ridden rant about HAMVOIP, indicative of his animosity toward the organization.
    - Fields targeted HAMVOIP since at least December 8, 2019 when he mentioned the organization in the YouTube video listed above.

- **Todd Lesser** – Five Wiki pages are created about Todd Lesser at wiki.w9cr.net, discussed further below

- **John McGough** and his company IntTek – Two Wiki pages are created about John McGough at wiki.w9cr.net, discussed further below

2. CYBERSMEAR VICTIMS ESTIMATE

Below is an estimate of how many individuals Fields attacked based on the above-mentioned disputes:

- FRC – **11 people**
- ASL – **7 people**
- ARDC – **at least 1 person**
- Organization / Company – FRC (dissolved); ASL, ARDC, HAMVOIP, and IntTek

3. WIKI PAGES FIELDS CREATED OF INDIVIDUALS ATTACKED DURING CYBERSMEAR CAMPAIGNS

The following Wiki pages are on the wiki.w9cr.net website:

Ken Bryant

- https://wiki.w9cr.net/index.php/Ken_Bryant
- https://wiki.w9cr.net/index.php/Ken_Bryant_Impersonation_of_Federal_Agent

NOTE: Fields targeted Ken Bryant since June 2022 when Fields created Wiki pages dedicated to Bryant.

John David McGough

- https://wiki.w9cr.net/images/c/cf/HR_Timer_presentation.pdf
- https://wiki.w9cr.net/index.php/Dahdi_dummy

NOTE: Fields targeted John McGough since at least December 8, 2019 when Fields mentioned him in the above YouTube video and at least through December 30, 2022 when Fields updated McGough's Wiki page.

Todd Lesser

- https://wiki.w9cr.net/index.php/Todd_Lesser
- https://wiki.w9cr.net/index.php/Todd_Lesser_Businesses

- https://wiki.w9cr.net/index.php/Todd_Lesser_Other_Assets
- https://wiki.w9cr.net/index.php/Todd_Lesser_Property
- https://wiki.w9cr.net/index.php/Todd_Lesser_Social_Media

NOTE: Fields targeted Todd Lesser since at least December 8, 2019 when Fields mentioned him in the above YouTube video and at least through July 12, 2022 when Fields update one of Lesser's Wiki pages.

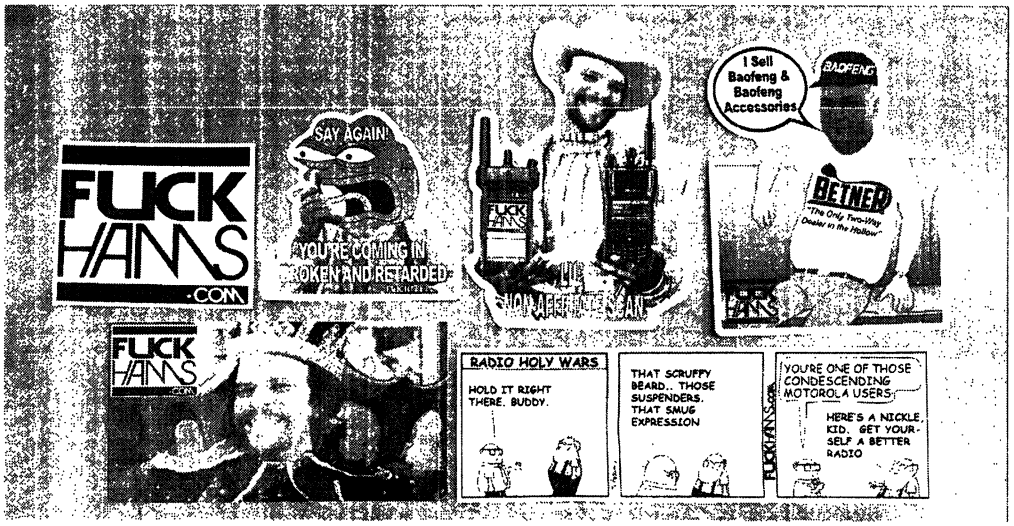
William (Billy) Klosowski

- https://wiki.w9cr.net/index.php/Billy_Klosowski

NOTE: According the Kloslowski's Wiki page, Fields targeted William Kloslowski since at least January 29, 2021 when Fields and Klosowski chatted online and at least through July 17, 2022 when Fields updated Klosowski's Wiki page.

Exhibit 2

SUMMARY OF BRYAN DONALD FIELDS' CYBERSMEAR "STICKER" CAMPAIGN:



Defendant Fields is a moderator of the private Facebook group "Motorola P25/TRBO/TETRA Users" where he created a Facebook post on May 8, 2022 about stickers he will send to any group member who requests them. According to the images, the stickers are cartoon depictions with peoples' faces transposed onto them. (See image above.) Further, stickers are created for the purpose of defaming and demeaning people who Fields has ongoing disputes with.

It was Fields' intention to demean, belittle, and ridicule people by creating a sticker campaign that overlays people's faces onto cartoon characters' bodies. The campaign included a request by Fields to (1) affix them in such a way that others could or would laugh at them and (2) "get pics back to us" (presumably as a form of self-gratification for Fields).

The aforementioned post contains and reveals the following information:

A. Mr. Fields' title in the private group is Admin and according to the image, he created the featured post on May 8, 2022.

B. The image is a .pdf document created from a screen capture taken of the post and comments. Metadata associated with the .pdf document shows it was created on June 23, 2022. On that date, the private Facebook group maintained 5,900 members. Therefore, the post was presented to nearly 6,000 people in the group.

C. Fields announced the sticker campaign by stating "Stickers? STICKERS! Stickers are here and free for the asking. We only want action shots when you use them. Bonus to anyone going to Hamvention, the best use/placement will get a prize." He further stated "Post your ham callsign below, and optionally if you're going to Hamvention. We'll fill a USPS first class envelope with a stamp's worth and send

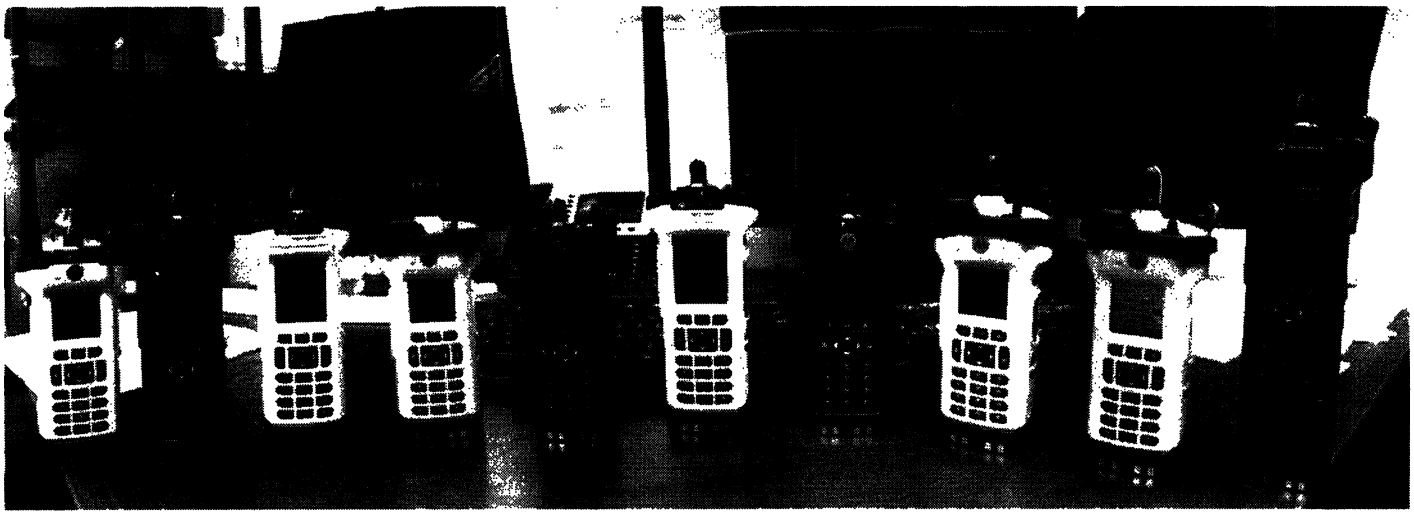
it to your FCC listed address. If you're not licensed, post your mailing address" and "All you have to do is get pics back to us."

D. The post includes an image which shows several stickers created with at least two people's faces transposed over the cartoon image. The stickers are watermarked/branded with the fuckhams.com website, for which site Fields is at least a moderator, if not creator. The campaign is mirrored at https://fuckhams.com/b/res/26.html, also on May 8, 2022, and titled "Stickers? STICKERS!" The post states "Who wants stickers? Leave your call[sign] below and some will be sent to you[r] FCC address. It's a random assortment of the one in the picture. Best action shot or hamfest placement wins a fuckhams gold subscription." At the time, the fuckhams.com website already contained several negative comments about Mr. Bryant. Defendant Gallini as well as a colleague of Defendant Fields, who is a competitor of Plaintiff Bryant, had requested that Fields create a sticker depicting Mr. Bryant; it is unknown whether Defendant Fields created such a sticker pursuant to these requests.

E. There were 152 comments made. Fields' responses were part of the 152 comments as he responded to mostly everybody who commented, as follows:

1. 52 people responded with their callsign or address to be sent stickers
2. Fields responded to most entries, except to one person who disagreed with the sticker campaign, Adam Isakson.
3. Adam Isakson disagreed with the sticker campaign and commented twice, as follows: "It's kinda ignorant to put someone's company logo on a sticker to have distributed in a negative way. If it were my business we would have some serious issues" and "Send me all of them so I can throw the stickers in the trash."
4. 53 people reacted to the post with emojis, although the type of emoji is not visible

F. Within the comment thread, Fields posted a photo showing a stack of envelopes ready for mailing. His comment stated "Ones for today's mail. If you're going to Dayton, clocks ticking on these!" His next comment was "First batch of 50 or so sent out today First Class USPS from 33701. We have lots more."



Motorola P25/TRBO/TETRA Users

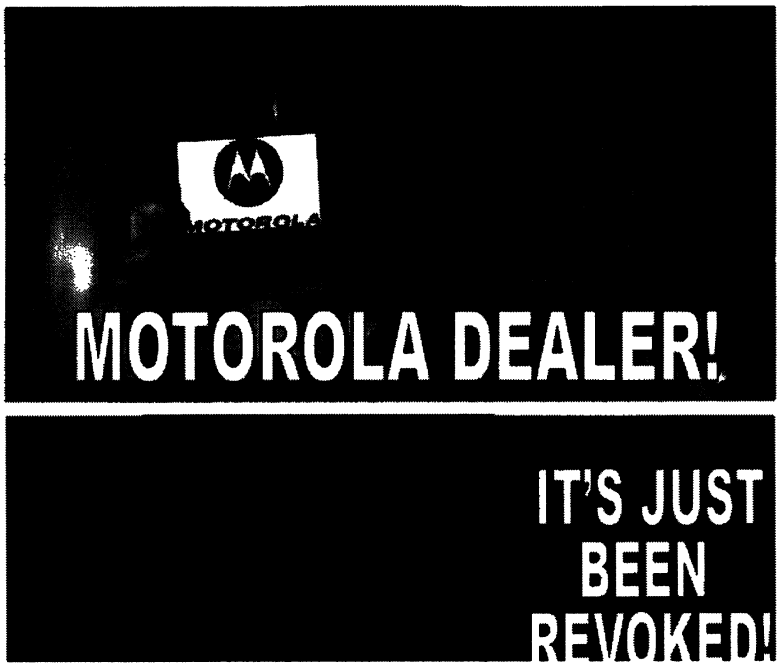
Private group · 6.9K members

Joined Invite

Discussion Featured Topics Your Items Members Media Files Questions

Bryan Fields
Admin · May 7 · 😂

Saturday fun 😘



33 17 Comments

Like Comment Send

Top comments

Write a comment...

Ryan Øwens Admin Group expert
Any chance that comes in a sticker?
Like Reply 17w 3

Mike McCurry
Awww too bad... wasn't he selling APX's to private individuals at contract prices.
Like Reply 18w

Pj Heck
Mike McCurry There was some person doing that, but then also having them touched by another, and then selling them is what I heard.

So legit radios became bastard radios with no depot warranty support.
Like Reply 18w 4

Erik Van Renselaar
Mike McCurry I thought contract prices were 15% above listed price? They sure seem to be for our system's contract (!)
Like Reply 18w

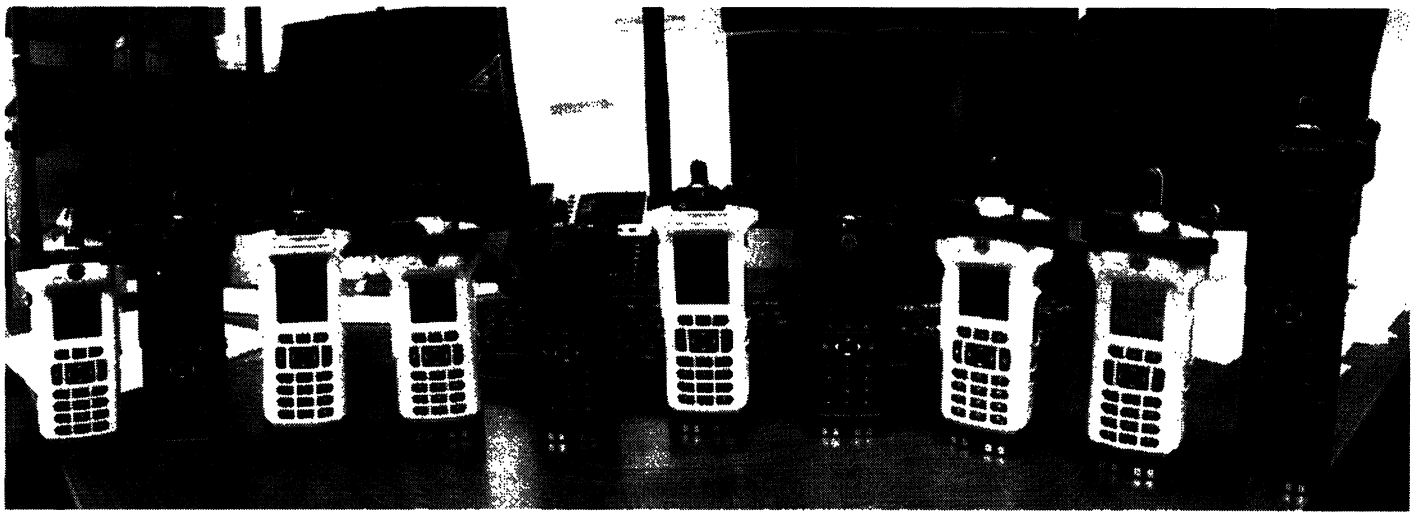
Reply to Mike McCurry...

Matt Jackson
Elaborate?
Like Reply 18w

Billy Ray Harrison
please tell me this is who i think it is
Like Reply 18w

Bryan Fields Author Admin
Billy Ray Harrison the vp of Motorola channel partners.
Like Reply 18w

Write a comment...



Motorola P25/TRBO/TETRA Users

Private group · **6.9K members**

Joined **Invite**

Carsten Gallini shared a link.
June 11 ·

Seems the Batman of the radio world strikes again. I wonder when we will get a commemorative sticker?

https://wiki.w9cr.net/index.php/Ken_Bryant

https://wiki.w9cr.net/.../Ken_Bryant_Impersonation_of...

WIKI.W9CR.NET

Ken Bryant - W9CR

Ken Bryant /Bryant Enterprises, LLC/ D/B/A North Georgia Communications / DMR on Cloud hit me up on facebook messenger recently. He's also better known as K1DMR.

23 84 Comments

Like **Comment** **Send**

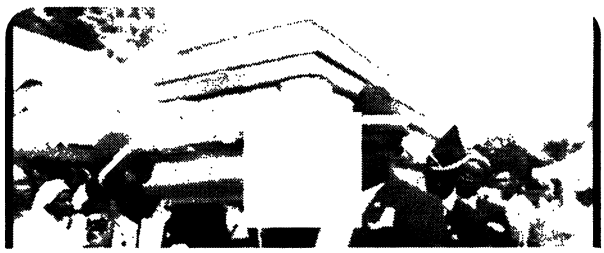
Top comments

Kyle Lucas
For some reason this looks like a obituary

8

Like **Reply** 13w

Carsten Gallini Author
Kyle Lucas



GIPHY

2

Like **Reply** 13w

Gary Taninbaum
Kyle Lucas I assure you I was FTF with him last Saturday.

Like **Reply** 13w

Michael Gerrity
Kyle Lucas I thought the same thing when I first pulled up the page.

Like **Reply** 13w

Matt DeHope
After reading this, it's definitely eye opening. I bought from him once in the past and wasn't impressed with the service part. For someone who is a channel partner, the service process should have been much smoother.

2

Like **Reply** 13w

Wanda Jonah Riner
I am new here & just joined but Ken has always been fair to me. I have bought several radios & repeaters from Ken. Most recently the ION & R7. I, also, saw him & spoke with him & Marla at the Atlanta Hamfest.

Like **Reply** 13w

Danny Soto
I've dealt with Ken in the past and have had no issues. He helped me quite a bit with programming.
I'm not going going to knock on someone's past especially from almost 40 years ago as I've had my fair share of police run ins and arrests when I was ... **See more**

2

Like **Reply** 12w

Brian Betts
I've dealt with Ken several times and never had an issue with his service or pricing. I will use his services again in the future.

6

Like **Reply** 13w

Media Files Questions

Carsten Gallini Author
Brian Betts not saying don't. I find the whole situation funny. And some of the info is interesting. Figured might as well share it so folks can stay informed

Like **Reply** 13w

Rick Schafer
Brian Betts same with me. He always went out of his way to help.

4

Like **Reply** 13w

James Butterfield
Let's not forget the NCPRN lawsuit filed by Ken.

3

Like **Reply** 13w

Carsten Gallini Author
James Butterfield this, he lost access for breaking tos,today, part 97 by advertising his stuff for sale. It was deserved

Like **Reply** 13w

Timothy Eichelman
Explain to me why this is a issue ?? The man is a respected business man and to defame him like this is a atrocity

9

Like **Reply** 13w

Bryan Fields Admin
Timothy Eichelman it's not defamatory, I didn't know the guy until last week when he accused me via fb messenger of being someone who he had paid. The whole chat is there, you may read it for yourself.

I then researched him and published what I fou... **See more**

3

Like **Reply** 13w

Timothy Eichelman
Bryan Fields i hear you but this sounds like a pissing match and a retaliation post thats all

3

Like **Reply** 13w

Matt DeHope
Okay just read the second article and gotta say, that's really disturbing. Definitely adds up considering the radio aspect to the case. I find it hard to believe that Motorola would allow him to be a channel partner let alone a dealer. I find it even h... **See more**

Like **Reply** 13w

Kenny Ray
Austin Read is this the ken that u told me never to buy an Ion from since he keeps remote control of the units even after someone buys from him? He also claims to have the best prices lol

Carsten Gallini Author
Kenny Ray higher is better right?

Like **Reply** 13w

Kenny Ray
Carsten Gallini **Ken Bryant** is higher your motto?

Like **Reply** 13w

The comment Mikkel Aarup Hansen is replying to has been deleted.

Mikkel Aarup Hansen
Austin Read Posting a photo with peoples names and call signs seems very inappropriate.

Like **Reply** 13w

Kenny Ray
figured i would jump in here. I think i found the issue....California

https://www.qrz.com/db/NR6E

NR6E USA

MIKKEL HANSEN
21111 Wheaton Terrace
Lake Forest, CA 92630
USA

Like **Reply** 13w

Carsten Gallini Author
Kenny Ray rip

Like **Reply** 13w 3

Kenny Ray
Mikkel Aarup Hansen full disclosure, mine is wx4tcc and im on qrz, enjoy lol

Like **Reply** 13w

The comment Carsten Gallini is replying to has been deleted.

Carsten Gallini Author
Mikkel Aarup Hansen How so, its like if I went into radio ID or QRZ and posted a pic of the call sig list. Not much in his pic besides the fact that they have IONs

Like **Reply** 13w

11 Replies

Gary Taninbaum
Kenny Ray Other Ion sellers do the same thing. My friend bought one from another reputable seller, & he's in the same boat. Remember, these radios are meant to be sold to a single entity, where only one person programs them all.

Like Reply 13w

Kevin Williams
I have purchased from John Betner and never had a problem.

I have purchased from Ken Bryant and never had a problem.... **See more**

Like **Reply** 13w

Carsten Gallini Author
Kevin Williams and nowhere here does it say don't. Its just information based on fact and other folks experience with him. And from other comments it doesn't seem to be an outlier

Like **Reply** 13w

Gary Taninbaum
Kevin Williams Same here. I have purchased from the same three, & never had a problem.

Like **Reply** 13w

Ira Friedman
Who's the two-face of the radio world then?

Like **Reply** 12w

Mike McCurry
Didnt he sue other hams to get on a closed repeater

Like **Reply** 13w

Alex Elmi Admin Group expert
Mike McCurry he got booted from NCPRN for using it as a regular part of his business, and then suing when his access was revoked.

NC court/judge was a dunce that didn't understand FCC laws and the entire process dragged out longer than it should. Ess... **See more**

Like **Reply** 13w

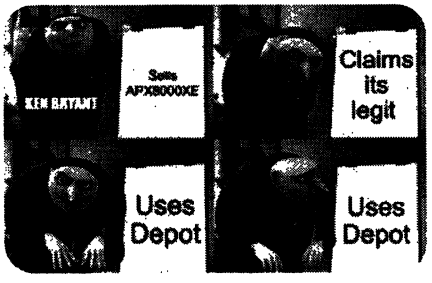
Mike McCurry
I heard Motorola revoked his dealership..

Like **Reply** 13w

Jim Housos
I wish Jeff Cherry was still around, He would have amazed to hear about the so called Mr nice guy Ken Bryant!

Like **Reply** 13w

Mascarpone Agroalimentare



Gary Taninbaum
Mascarpone Agroalimentare But I thought Depot can not be used on any APX with FW newer than 17. So how can an APX that's a few years old, or newer be programmed with Depot?

Like **Reply** 13w

8 Replies

Gary Taninbaum
I've known him since 1995. Bought a few radios from him back then, & a few about five years ago. Just bumped into him last Saturday at a ham fest in Alpharetta, Georgia. He always treated me right.

Like **Reply** 13w Edited

Felix F Ferrer Jr.
Gary Taninbaum amen Gary

Like **Reply** 13w

Carsten Gallini Author
Gary Taninbaum atleast with my experiences interacting with him my opinion on the matter is that he's a sue happy joke, with no people skills. Even before I seemly pissed him off he was not a pleasure to deal with.

Thats just my experiences with him,... **See more**

Like **Reply** 13w

Gary Taninbaum
Carsten Gallini Let me give you an example of people being pissed at him for no reason. A local wanted to buy a DMR mobile radio from him. He called up Ken, finalized a price, & reaffirmed the mobile radio was brand new. Ken assured him it was. So the ... **See more**

Like **Reply** 13w

Carsten Gallini Author
Gary Taninbaum oh yea, hams are eh, I've only got my license to play around with TETRA.

Like **Reply** 13w

Scotty William
Gary Taninbaum Alpharetta my condolences for being there.

Like **Reply** 13w

Gary Taninbaum
Scotty William Well it was also an excuse to visit my brother who lives there.

Like **Reply** 13w

Scotty William
Gary Taninbaum that's a better reason lmao. I

Like Reply 13w

Gary Taninbaum
Scotty William Haven't seen him in a few years since his daughter's wedding. He was in the military for 20+ years. I'm on the right.

Like Reply 13w

Ira Friedman

Like Reply 13w

Matt DeHope

Like Reply 13w

Marco Torre
Jim Housos !

Like Reply 13w

Aaron Forsman
Ken Bryant ?????

Like Reply 13w

Bryan Fields Admin
so i didn't expect this to be posted here, but such is life. Until last week I've not had issue with **Ken Bryant**, but he messaged me out of the blue claiming that I worked for him and he was going to sue me. Upon speaking with others, I found it was a... **See more**

Like **Reply** 13w

Antonio Torch Kelly
This explains everything

Like **Reply** 13w

Exhibit 5

Main Page

W9CR info site

This is a small collection of stuff about hacking various radios. Right now it's mostly about the Quantar series of radios.

I expect to have some info on the AstroTac receiver and Comparators as well.

Contents

Radios/Electronics

Computers/Networking

Allstar
Todd Lesser

Documents and Standards

Miscellaneous

- Categories - A listing of all categories on this wiki

Radios/Electronics

- Information on the MTR2000 repeater I've messed with a while back. These are a "Quantar-lite", and kinda suck. I've recently added how to update them to the latest firmware.
- There is some information on the Uniden MRS904 repeater converting it for amateur use.
- Motorola Waris modifications and tech info. This covers the entire Waris line, HT/CDM/Pro/GP/GM/MTM700/EX/PR/CP
- Motorola R2001A/B/C/D communication service monitor information and manuals
- Hamtronics 220 repeater notes
- Telewave antenna patterns for radio mobile.
- XTS 2500 notes on programing for the 900 MHz Ham band.
- XTL Radio info on the XTL 2500/5000 mobile radios
- EF_Johnson some notes and programing info on the EF Johnson 5100 and 5300 radios
- Yaesu FT-51 Info on modification and service manual
- Kenwood Service Manuals - Kenwood service manuals I've scanned
- Kenwood Manual Category
- Yaesu Category
- Harris Falcon
- DMR IDs - Thoughts on the ham DMR ID fiasco.
- Trasnmitter Combiners - notes on transmitter combiners I've worked with and general theory.
- 2020 Ram 1500 Eco Diesel Radio Install - Work in progress about how I installed radios in my truck.
- BreezeACCESS FHSS radios - work in progress about how to repurpose the BreezeCOM/Alvarion BreezeACCESS II/900/V radios and convert the SU to AU. This was the top of the line wireless ISP gear circa 1998-2004.
- Astro Saber/XTS/Spectra category and notes

- Motorola Saber Radio category
- Transmitter Fingerprinting Info on various Transmitter Fingerprinting Implementations.

Computers/Networking

- Cisco 3945 Notes on changing fans to be quieter
- HamWAN remote, a way to link into HamWAN Tampa via VPN using cheap routers.
- Inmarsat Docs Found online

Allstar

- dahdi_dummy for AllStarLink 1.01 and HamVoIP theft of code.
- Information about the take over of AllStarLink, Inc.

Todd Lesser

- Todd Lesser of San Diego, CA and his company North County Communication, Inc. is known to engage in fraudulent telecom billing via his sex chat lines. Has several judgements against him and and his companies in both California and West Virginia.

Documents and Standards

- R56 - Standards and Guidelines for Communication Sites

Miscellaneous

- For the goons at hamsexy (http://www.hamsexy.com) which is apparently still alive and the APX/TRBO/TETRA users group (https://www.facebook.com/groups/1544491192475817) here's the William Klosowski, K4SVT drama.
- TEOTWAWKI - This might be useful for regular and irregular forces.
- Ken Bryant, K1DMR of North Georgia Communications doesn't want you to see this

- Total pages on this wiki: 3,013
- Total articles on this wiki: 38
- Total files on this wiki: 2,630
- Total edits of this wiki: 8,810

sitemap (https://wiki.w9cr.net/sitemap.xml)

Exhibit 6

Ken Bryant

Ken Bryant (http://www.kenbryant.net/2.html) /Bryant Enterprises, LLC (http://www.firstrespondersupply.com/)/ D/B/A North Georgia Communications (https://northgeorgiacommunications.com/) / DMR on Cloud (https://dmroncloud.com/) hit me up on facebook messenger recently. He's also known as K1DMR (https://wireless2.fcc.gov/UlsApp/UlsSearch/license.jsp?licKey=3653425), Ken Lawrence Bryant, K. Lawrence Bryant, Kenneth Lawrence Bryant.

Photo-of-ken-bryant

Note the only interactions I've had with him was inquiring about the Motorola ION (https://www.motorolasolutions.com/en_us/products/two-way-radios/mototrbo/portable-radios/mototrbo-ion-radio.html) radio, which was overpriced from him and required me to use his radiocentral agency; I wanted my own agency so that I would have control over it. The other time was inquiring about his WAVE product, where he wouldn't discuss it unless via phone and provided no details on it, nor pricing.

I just assumed he was a bad salesman or at worst a guy trying to bottom feed in the amateur market since he can't hack it in the commercial market. Let's be honest, hams are a hard market to serve and no dealer is going to make much money selling one or two radios.

Fast Forward till June 4, 2022 and he sends me some messages about defaming him on some forum. He claims this harassment has "gotten to a point where it might affect your career."

- **"I have paid you sales commissions and you have purchased from me going back several years"** - nope
- **"I am a Motorola channel partner, I own a Motorola dealership"** - rofl, like that's some big thing, sure ken
- **"I have plenty of canceled checks and invoices to you if you even scroll up in your own threads right here you will see previous messages about business transactions"** - nope, see below.

So Ken Bryant may be insane, and at least epitomizes the "Boomer Ham". He's got a poor grasp on technology and an even poorer grasp on human interaction. I suspect this is why I saw nothing on his WAVE soultion as he can't code it, and lacks the technical prowess to hire it out.

Looks like he's an admitted whacker, radio pirate and former convicted felon too!.

"that's how the graham cracker crumbles"

Contents

Images from Facebook chat
Another Facebook Chain, Another person
Real Estate agent?
Further Research

Images from Facebook chat

Read theses top to bottom. This is insane!

Ken Bryant

Facebook

Mutual Friends on Facebook

29 mutual friends including Richard Rexroat

Greetings, saw your post on the TRBO ion radio, what are you asking for one?

does it come with anything?

Please call me for pricing tomorrow. 828-389-5000

Pm sent

So I have a system setup here and we have a tg just for us to play on

that's linked on wave

Hey call me this evening 828-389-5000

and we're using a dlu to link that back to p25

you have any docs/etc. on your soultion?

We really don't want to give it out at first because we want to prevent people copying fro[illegible]hat we're doing just give me a call later and we can dis

We really don't want to give it out at first because we want to prevent people copying from what we're doing just give me a call later and we can discuss

ok

hey ken, it's not that I've forgotten about this, I've been sick with the flu (not covid thank god). I'll give you a shout next week, when I'm better

No biggie, plenty busy, not going anywhere.

Getter better soon!

Thanks, Ive been tired af, just got out of bed. Talk soon

Missed audio call

Hi what's going on I'm getting all sorts of calls from people that you are defaming me and others. Whatever you have done has gotten a lot of people pretty angry. Please give me a call it has gotten to a point where it might affect your career. 828-389-5000

Wtf are you talking about?

I don't know you at all!

Please scroll up and look at the earlier messages we have done business before.

Please scroll up and look at the earlier messages we have done business before.

I've never done business with you

There is this site where allegedly you posted a bunch of stuff called fuckhams.com

Fuck Hams

Yes you have I have paid you sales commissions and you have purchased from me going back several years

What exactly do you have an issue with?

I just sent you the website where the posts were

It's a website

What specifically are you referring to?

You've paid me? For what services?

As far as I'm concerned it is defamation others have other concerns.

Again, I'm asking what specifically you're referring to

You're just some ham from Facebook afik

I'm talking about the defamation that occurred to me and

I'm talking about the defamation that occurred to me and my business that apparently was posted by you on that website

Afaik

I am a Motorola channel partner

I own a Motorola dealership

Dude, show me, you sent a link to a website. That's like posting qrz.com

Callsign Database - QRZ.com

Do you have any proof of this? I would love to see a check or invoice from myself to you

Sure, I have plenty of canceled checks and invoices to you if you even scroll up in your own threads right here you will see previous messages about business transactions

I don't see anything

Just scroll up

There's nothing there

Last time we communicated was February 25th

So send me some

Yes I'll email it to you, I find it kind of hard to believe you don't know who I am

Did you not post the above?

Nope

Okay a couple people are saying that you did but we'll track it back

I want to see what business you say you've done with me

Man if you can remember I don't know what to tell you

I think you're full of shit

And lying

Seems like a simple request

Since you're claiming to have paid me

Someone asks me for that proof, I can provide it as an Invoice/PO or canceled

Like simple shit

So put up, or quit running your channel partner mouth about it

Well maybe you or somebody else the same name. If you didn't publish that or have anything to the website then you've got nothing to worry about.

There's no reason to start cussing and using foul language

I'm driving a car at the moment if you don't mind

You are the one who said to scroll up, meaning that you know this is the right person, and that you are saying the proof is in the chat

I don't see it

Again as I said I'm driving a car if it's in my history I don't know why it's not in yours I can obviously screenshot it and send it to you when I get a chance send me your email I'll be happy to send it to you

So if you've got a cancel check, or invoice, show me some proof

Again as I said I will check my records it might be another person with your same name

Please send me what "proof" you have when your parked.

You're just some random boomer ham running his mouth otherwise

The Brian Fields that I know and have done business with used to work for bearcom in Texas, so again maybe it's somebody with the same name

↓ n, if it's in the chat, you can see it

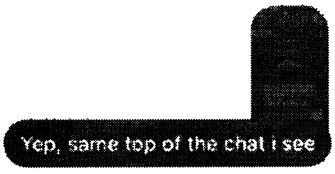
Ken, if it's in the chat, you can see it

I can't

It's either there or it's not

Here is one of the screenshots in my history from you

Calling a spade a spade isn't foul language



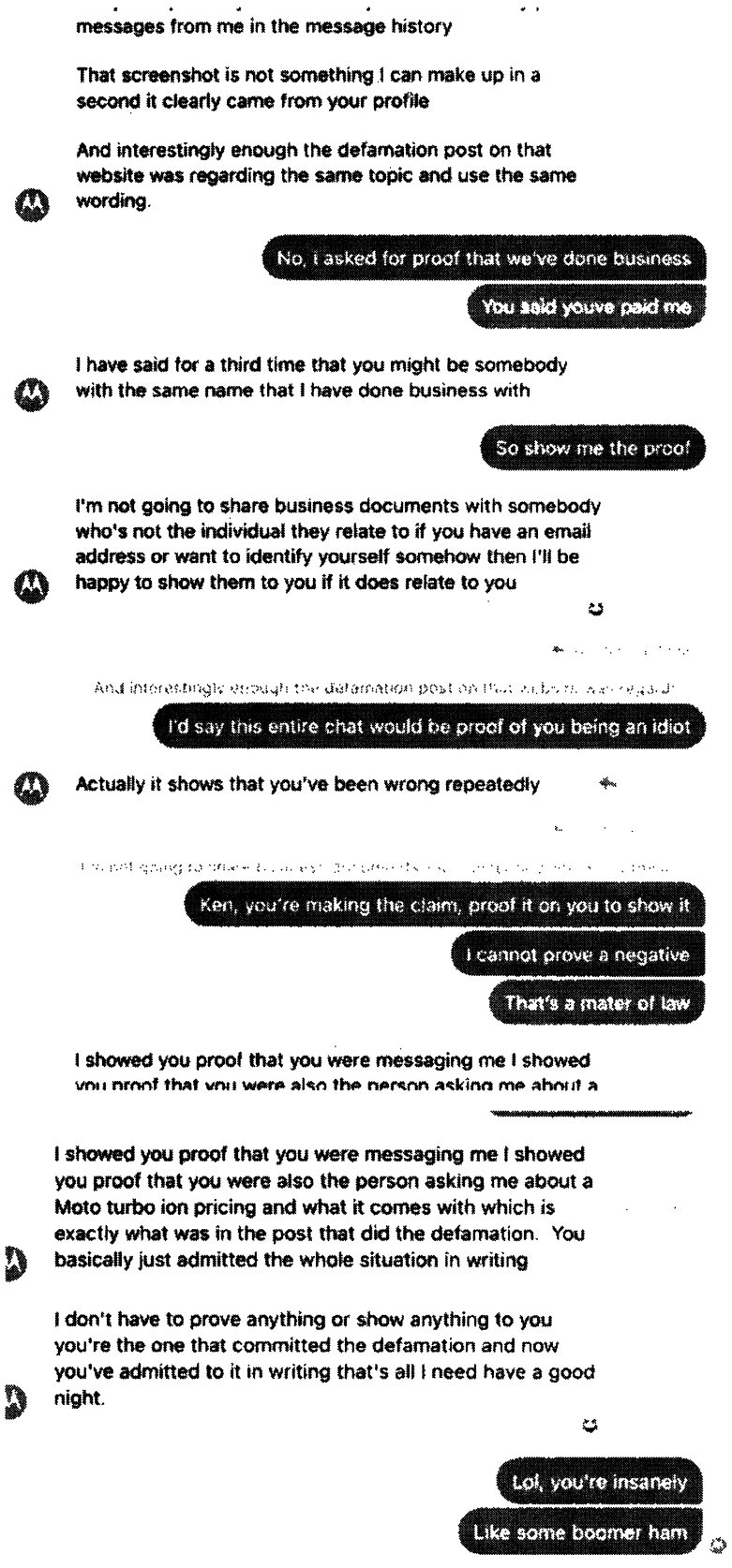
Yep, same top of the chat i see

I just sent you proof from your own message profile that you are messaging me in January 2021 so who is the Spade

It's not there

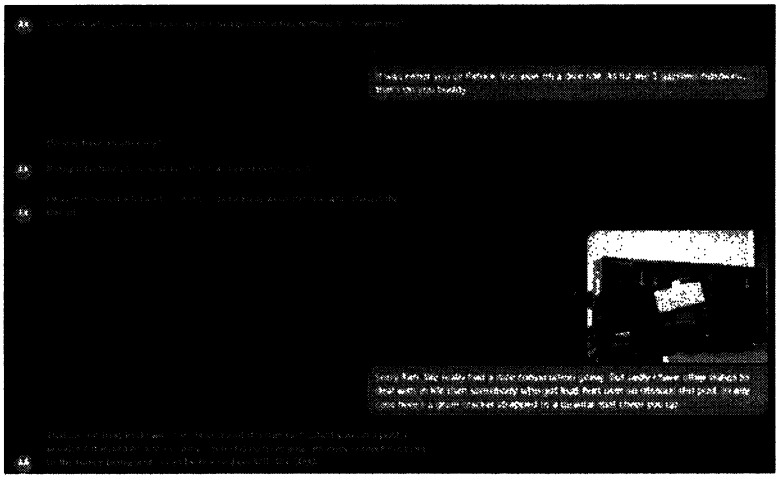
You just repeatedly told me that you never saw any prior messages from me in the message history

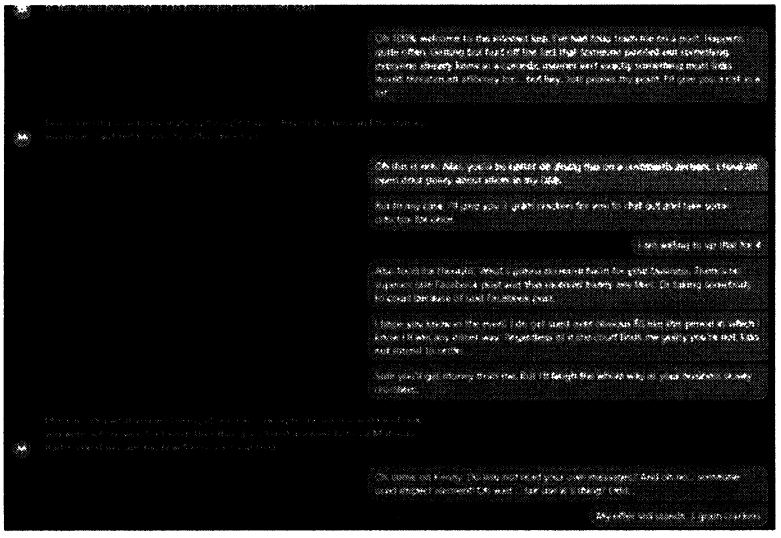
That screenshot is not someti can make up in a second it clearly came from your profile

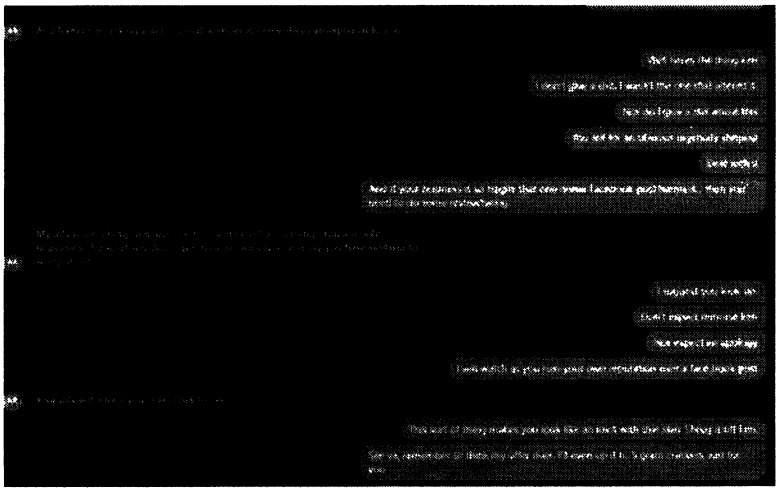


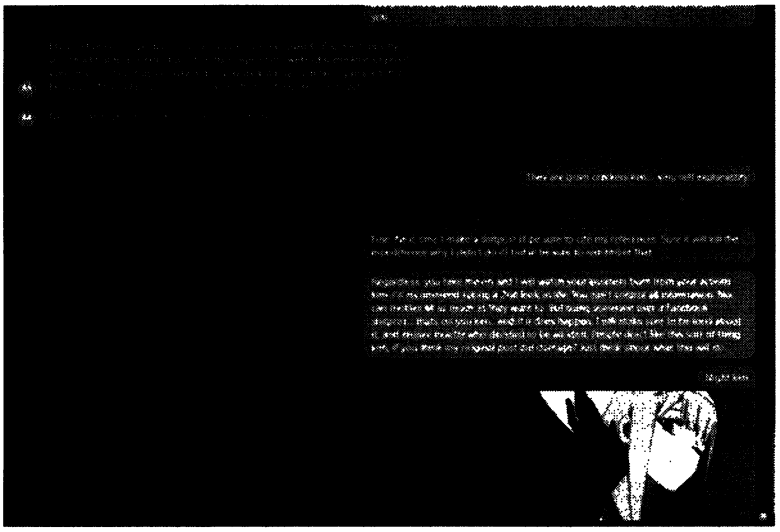
Another Facebook Chain, Another person

Yall Like crazy? Read these top to bottom









For context, this was in response to what we in the business call a "Shitpost (https://www.urbandictionary.com/define.php?term=Shitpost)" that could be found here (https://facebook.com/groups/1544491192475817/permalink/3122094558048798/) where the only references the involved made to Ken were some quips about ken selling" "quality" radios", and "deserves the honest dealer of the year award"

-Rosesam

Real Estate agent?

Aparently he's a scummy realtor too.

http://kenbryant.info/

http://www.ncmountainsandlakes.com/

http://www.gamountainsandlakes.net/

Further Research

After some other people reached out regarding disturbing comments regarding Ken Bryant, I did a bit of digging in his background. Ken claims to have several degrees, and multiple graduate level degrees as well on his QRZ page (https://www.qrz.com/db/K1DMR)[1]. What's curious is the voice moving from first person to third and back again in this. I then saw his notice

> "Presidential Staff member for planning and logistics to the White House Advance during the Reagan, Bush and Clinton Administrations"
>
> "I possess a Master of Science Degree in Criminal Justice, **summa cum laude**"

The staff member during the Regan - Clinton administrations would mean he worked at some point from 1981-2001 for the white house for 14 years. I thought Ken was in his late 40's or early 50's, so this would mean he was very young, even if we take the last year of Regan (1989) to the first year of Clinton (1993) to be working in such a position. It's not impossible.

Note that in most colleges in the US and Europe summa cum laude/Latin honors are only awarded to under graduate degrees (https://en.wikipedia.org/wiki/Latin_honors#Distinctions). ~~This doesn't mean it's not true, I can be wrong.~~ See below.

Update 2022-06-13, I reached out to the Sr. Program Coordinator of the Department of Criminology & Criminal Justice at FIU (https://ccj.fiu.edu/). He responded:

> Hi Bryan,
>
> I just checked the transcripts of a few of my students who have graduated with their Masters in Criminal Justice degrees and their degrees are not posted with Latin Honors. Their Bachelors degrees are.

This means at minimum that Ken doesn't have Latin honors on his "masters degree" and perhaps lacks the degree all together.

The wording of this landed me to his link to http://amlcft.com/about/ (https://web.archive.org/web/20150221211337/http://amlcft.com:80/about/) which is a business he purported to run for anti-money laundering consulting. On this page, there were document numbers for name registrations with the Florida Dept. of State, aka sunbiz.org. G02107900163[2] found him to be using the name "K. Lawrence Bryant" circa 1999.

As Ken has stated he is "Former Federal Agent, U.S. Department of the Treasury" it's likely he will be in PACER (https://pacer.uscourts.gov/). All federal agents will be giving testimony or writing other things that show up in the courts, and one would expect him to have done so. The only thing I would find was a criminal case 4-726-Cr-EATON. This seemed strange, but there was no info in PACER for this. We're lucky that at one time PACER was almost indexed by Aaron Swartz (https://en.wikipedia.org/wiki/Aaron_Swartz#PACER), and his archive has these important documents. I'd encourage you to read more about Aaron if you've never heard of him.

As it turns out, at age 20/21 Ken was impersonating a federal agent what would have been his junior or senior year of his under grad at FIU!

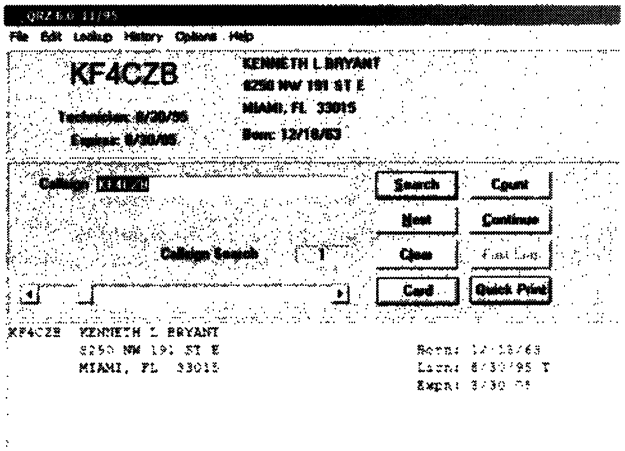
This is all starting to make sense. Why would a person who's an expert in anti-money laundering ask for hams to pay him in violation of PayPal and bank policies?

From: Ken Bryant <email@kenbryant.net>
Subject: **IONs have ARRIVED**
3/4/21, 10:10 PM
To: bryan@bryanfields.net <bryan@bryanfields.net>
Cc: Marla Kephart <marla@northgeorgiacommunications.com>
Valid (Signed by kenbryant.onmicrosoft.com)

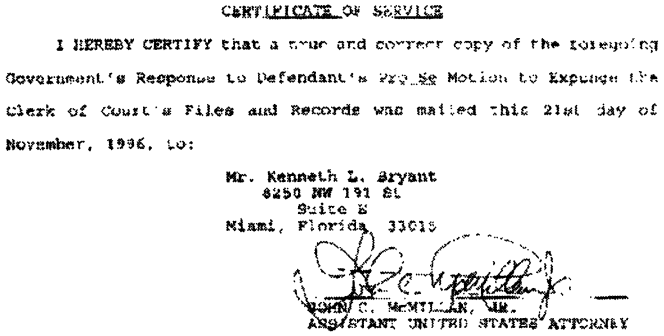
```
Credit Card - (we send you a link to a secure site to pay online and we pay up to 1% on your behalf)

Credit Card - Personal VISA/MC/DISC 2%

Credit Card - Corporate or Rewards 3%

Credit Card - AMEX 3.5%

Credit Card - Int'l 4%

Paypal Invoice - Domestic 3%/International 4.5% (we will send an invoice paypal request after you approve the draft invoice)

Paypal Friends & Family NO FEE (must have a connected bank account or paypal balance, specifically make sure the default GOODS AND SERVICES
is not selected, and DO NOT MAKE ANY BUSINESS RELATED COMMENTS IN THE NOTES)

Purchase Order - NO FEE (for qualified government entities and businesses)

Pop Money/Bill Pay - NO FEE

Check by Phone - NO FEE

Bank Transfer or ACH - NO FEE (we can also initiate to you with a picture of your check)

Bank/Cashier's Check/Money Order - NO FEE (you can send a picture of the check with tracking and it will not delay your order)

Wire Transfer - ($15 incoming fee, must be in USD and all sending fees prepaid)

Personal Checks - NO FEE (but will take 7-10 days to clear)
```

I was concerned this may not be him, but was able to look at his FCC call sign page in ULS, K1DMR (https://wireless2.fcc.gov/UlsApp/UlsSearch/license.jsp?licKey=3653425). This referenced his old call, KF4CZB (https://wireless2.fcc.gov/UlsApp/UlsSearch/license.jsp?licKey=568686). Now ULS only goes to about 2002 or so, so into the historical QRZ from November 1995, which found his Miami address and Birthday.

```
KF4CZB  KENNETH L BRYANT
        8250 NW 191 ST E                    Born: 12/18/63
        MIAMI, FL  33015                    Licn: 8/30/95 T
                                            Expn: 8/30/05
```



This DOB and Address matches filings he made pro-se in his criminal case.



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Government's Response to Defendant's Pro Se Motion to Expunge the Clerk of Court's Files and Records was mailed this 21st day of November, 1996, to:

Mr. Kenneth L. Bryant
8250 NW 191 St
Suite E
Miami, Florida 33015

JOHN C. McMILLAN, JR.
ASSISTANT UNITED STATES ATTORNEY

Now we know he was born in 1963, making him 18 when Regan was sworn in, which is a bit young for a White House advance team agent. In 1985 we can confirm he was on Federal Probation as a youthful offender, so this is not likely and he was not off probation until 1988. This would make his stated 14 years of service highly improbable. He stated in his filing to seal the court records in 1996 that he was unable to get a job as a federal law enforcement officer. This would make his claims even harder to believe.

Upon closer inspection, most of what he's listed on his resume is nothing more than volunteer positions. CERT, ARES Emergency Coordinator, U.S. Coast Guard Auxiliary, Emergency Management Institute, FCC License holder, etc. Some are simply hard to believe, such as his claim of being a Founding Member of the U.S. Department of Homeland Security. If anything I'd ask why a person with all these qualification, multiple graduate degrees, and business experience is working as a commercial two-way dealer; it doesn't add up.

I'd encourage everyone to review his federal conviction and case files. The finding of the psychiatrist who evaluated him was

> **"[Ken's] sense of reality might. be impaired and that [he] suffered from a possible psychosis."**
>
> and
>
> has "a possible personality disorder and a fantasy life which is: **"CLEARLY MORE ACTIVE THAN HIS SOCIAL LIFE."**

Based on my limited interaction with him, I think he may in need of further help.

1. Archive.org link (https://web.archive.org/web/20220611011744/https://www.qrz.com/db/K1DMR)
2. Sunbiz link for this (http://dos.sunbiz.org/scripts/ficevent.exe?docnum=G99084900060#)

Exhibit 7

Ken Bryant Impersonation of Federal Agent

Ken Bryant Impersonation of Federal Agent Case 4-726-Cr-EATON

After some other people reached out regarding disturbing comments regarding Ken Bryant, I did a bit of digging in his background. Ken claims to have several Degrees on his Linked in (https://www.linkedin.com/in/kennethlbryant/)[1] and on his old about page on amlcft.com/about (https://web.archive.org/web/20150221211337/http://amlcft.com:80/about/). After looking into PACER for him it was found that he was indited in Federal Court for impersonating a federal law enforcement officer, and alleged radio interface in June 1984.

Contents

Filings
- Indictment
- Federal Warrant
- Booking Information Sheet
- Response to Discovery
- Psychiatric Evaluation continuance
- Plea agreement
- Judgement Order
- Vacation of Conviction

Ken's attempt to seal the conviction

Filings

Not all the filings were able to be found, as refecned in the

Indictment

Here's a copy of the indictment

> During a conversation on or about June 11, 1984 defendant told the above-described FiU police officer that he was attempting to serve a federal warrant for obstruction of justice on an FIU student (hereinafter "the FIU student"). Defendant asked the police officer to observe the comings and goings of the FIU student in order to assist the Defendant in serving this warrant for obstruction of justice. Defendant also gave the FIU police officer an auto tag number, which auto tag was registered in the same name as the person whom defendant identified as the FIU student on whom he (defendant) stated he was seeking to serve the warrant.

> the defendant, on or about the date listed above, did knowingly and willfully, transmit his voice over a radio frequency utilized by the Miami, Florida office of the Federal Bureau of Investigation and therein identified himself as "KB" , signal "3-8-9-6-5" and stated there was a systems "intrusion";

RMI:ml

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

NO. 84-0726CR-EATON
18 USC 912
47 USC 301 and 501

UNITED STATES OF AMERICA

v. INDICTMENT

KENNETH LAWRENCE BRYANT
_____/

The Grand Jury charges that:

COUNT I

Between on or about June 1, 1984 and June 11, 1984, in Dade County, in the Southern District of Florida, the defendant,

KENNETH LAWRENCE BRYANT,

did knowingly and willfully falsely assume and pretend to be an officer and employee acting under the authority of the United States and a department and agency, thereof, to wit: a special agent for the Federal Government, and did act as such, in that, among other things, in Dade County, in the Southern District of Florida:

1. Between on or about June 1, 1984 and June 11, 1984, the defendant falsely told a Florida International University (FIU) state university police officer that he (Defendant) was a special agent of the federal government and that he was working out of the FBI office in Miami.

Federal Warrant

In this next we can see the Federal Warrant where he is charged with Falsely impersonating a special agent of the United States Department of Justice.

MAGISTRATE INFORMATION FORM

NAME OF DEFENDANT: KENNETH LAWRENCE BRYANT

OFFENSE(S) CHARGE: Impersonation Federal Agent

TYPE OF CHARGING DOCUMENT. (CHECK ONE)

___ INDICTMENT X COMPLAINT

___ BENCH WARRANT FOR FAILURE TO APPEAR

___ PROCATION VIOLATION WARRANT

___ PAROLE VIOLATION WARRANT

COPY OF WARRANT LEFT WITH BOOKING OFFICER?

✓ YES ___ NO

AMOUNT OF BOND: To be set

WHO SET BOND: ___

DISTRICT WHERE CASE PENDING: SDF

CASE NUMBER: 94-3706 CMS

ARRESTING OFFICER: Mac Cleary / COSTA (PRINT)

AGENCY: FBI - MIAMI

OFFICE PHONE: 573-3333

Note on page 8 you can see the phony document where Ken States he's a special agent with the "Organized Crime Strike Force"

United States Department of Justice
Organized Crime and Racketeering
Organized Crime Strike Force
Kenneth L. Bryant
Special Agent
Miami Field Office
3801 Biscayne Blvd.
Miami, FL 33137

June 4, 1984

State of Florida
Department of Law Enforcement
Criminal Investigation Division
Miami Operations Center
Earnest Neal
Special Agent
401 N.W. 2nd Avenue
Miami, FL 33128

Dear Sir;

The following attachment (2 of 2), refers to the audio visual rental of one (1) sixteen (16) millimeter (mm) film projector for a single (one) day (twenty-four (24) hour period).

I was advised by an industrial source that "there is no such thing as an 8mm projector." Further information provided was that the 16mm film projector is the standard particular to the film market industry. Please be sure and verify that your film Blood on the Mountain is of the 16mm variety. Advise if there is any deviation from the above mentioned presumption.

Respectfully submitted in all sincerity,

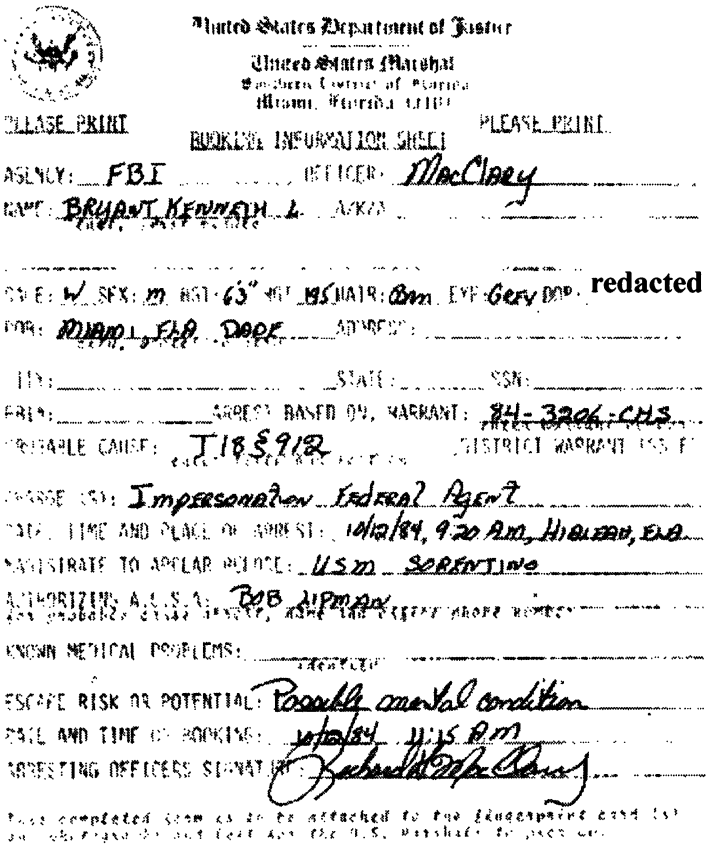
Kenneth L. Bryant
Department of Justice
U.S. Special Agent

EN:klb, Encl. A 2a
dw for klb DOJ/OCR

Ex. "A" (p. 1 of 2)

Booking Information Sheet

In this we can see the DOB, name and general description is a likely match for Ken. The officer noted "Possible mental condition" as well.



United States Department of Justice
United States Marshal
Southern District of Florida
Miami, Florida 33130

PLEASE PRINT — BOOKING INFORMATION SHEET — PLEASE PRINT

AGENCY: FBI OFFICER: MacCleey

NAME: BRYANT, KENNETH L. AKA/

RACE: W SEX: M HGT: 6'3" WGT: 195 HAIR: Brn EYE: Grn DOB: redacted

POB: MIAMI, FLA DOOF ADDRESS:

CITY: STATE: SSN:

FBI#: AGENCY BASED ON, WARRANT: 84-3206-CMS

CHARGEABLE CAUSE: T18 § 912 DISTRICT WARRANT ISSUED

CHARGE (S): Impersonation Federal Agent

DATE, TIME AND PLACE OF ARREST: 10/12/84, 9:20 Am, Hialeah, Fla.

MAGISTRATE TO APPEAR BEFORE: USM Sorrentino

AUTHORIZING A.U.S.A.: Bob Lipman

KNOWN MEDICAL PROBLEMS:

ESCAPE RISK OR POTENTIAL: Possible mental condition

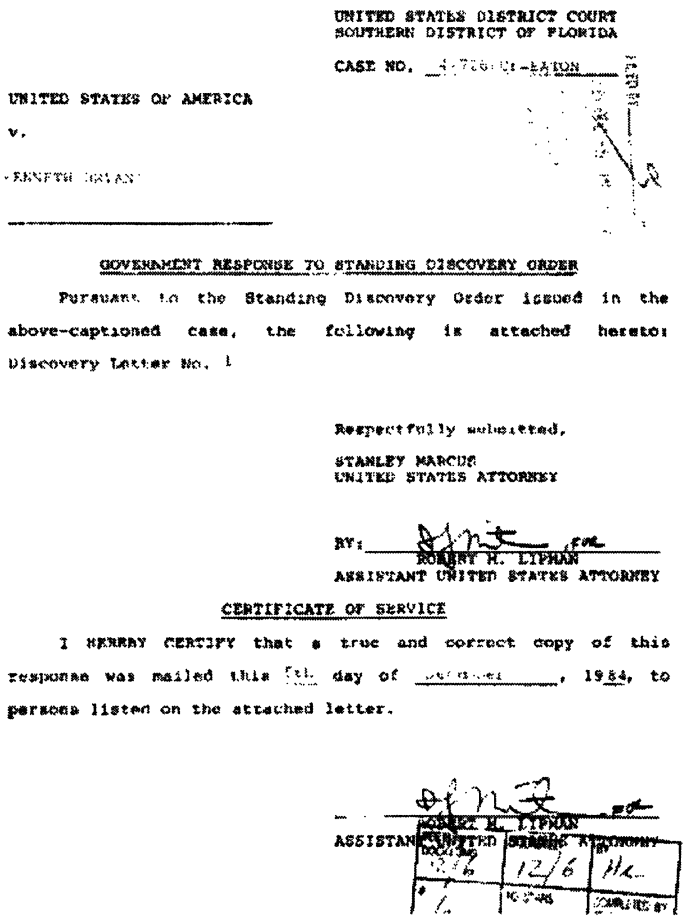
DATE AND TIME OF BOOKING: 10/12/84 11:15 Am

ARRESTING OFFICERS SIGNATURE: Richard MacCleey

This completed form is to be attached to the fingerprint card (s) and photograph of the defendant and the U.S. Marshal to whom

Response to Discovery

In this there is a description of the evidence the feds have on him.



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. [redacted]-EATON

UNITED STATES OF AMERICA

v.

[redacted]

GOVERNMENT RESPONSE TO STANDING DISCOVERY ORDER

Pursuant to the Standing Discovery Order issued in the above-captioned case, the following is attached hereto: Discovery Letter No. 1

Respectfully submitted,

STANLEY MARCUS
UNITED STATES ATTORNEY

BY: [redacted]
ROBERT H. LIPMAN
ASSISTANT UNITED STATES ATTORNEY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of this response was mailed this 6th day of December, 1984, to persons listed on the attached letter.

[redacted]
ROBERT H. LIPMAN
ASSISTANT UNITED STATES ATTORNEY

FILED | DOCKETED | 12/6 | [redacted]

Of the most interesting evidence claims by the Feds:

- recording of Ken Bryant speaking over City of Miami Police frequency
- statements over FBI radio
- claiming to be a Federal Agent to Secret Service employee John Allen
- Claims to FIU Police Officer Bustamante, Florida State Investigator Edward Wallace, Detective Osmond Austin, and DEA Special Agent Kenneth Goodman
- application for private investigator's license

Psychiatric Evaluation continuance

In this we his attorney (the federal public defender) move to have him evaluated by a psychiatrist. This is not uncommon in these cases, but the summary is interesting to read. Ken may suffer from the same problems still.

> Defendant was psychiatricly evaluated by Dr. Adolfo Vilasuso, psychiatrist. Dr. Vilasuso's preliminary findings indicated, among other items, that Defendant's sense of reality might be impaired and that Defendant suffered from a possible psychosis.
>
> On December 27, 1984, Dr. Lloyd Miller, Forensic Psychiatrist, examined Defendant and filed a report which reflected

RML:

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 84 /76-Cr Eaton

UNITED STATES OF AMERICA,

Plaintiff,

v.

Kenneth Bryant

Defendant.

FILED by DC
JAN 14 1985

PRE-PLEA AGREEMENT

The United States and Kenneth Bryant (hereinafter referred to as the "defendant") enter into the following Agreement:

1. The defendant agrees to plead guilty to Count 1 of the Indictment, which count charges the defendant with, in substance, falsely impersonating a special agent of the federal government and acting as such, in violation of Title 18, U.S.C., Sec. 912.

2. The United States agrees to dismiss the remainder of the Indictment, with respect to this defendant, after sentencing.

3. The defendant understands and agrees that the Court may impose any sentence authorized by law and that the defendant may not withdraw his plea solely as a result of the sentence imposed. In other words, the defendant understands and agrees that the Court may sentence the defendant up to three (3) years imprisonment and fine the defendant up to one thousand dollars ($ 1,000.00).

Ken Bryant, **plead guilty Jan 14 1985**, and he was 22. As this happened when he was 21, he was sentenced as a youth offender, and would be able to have the conviction vacated when he was off probation. (assuming he didn't re-offend).

Judgement Order

> a possible personality disorder and a fantasy life which is: "**CLEARLY MORE ACTIVE THAN HIS SOCIAL LIFE.**"

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 84-726-Cr-JUDGE EATON

UNITED STATES OF AMERICA :

VS. :

KENNETH BRYANT :

MOTION FOR CONTINUENCE OF TRIAL
FOR PURPOSES OF SECURING ADDITIONAL PSYCHIATRIC EVALUATIONS

The Defendant, Kenneth Bryant, through counsel, moves that a continuance of trial be granted in order to allow sufficient time for additional psychiatric evaluations to be performed. As grounds therefor, Defendant states:

1. On or about November 28, 1984, Defendant was psychiatricly evaluated by Dr. Amolro Vilasuso, Psychiatrist. Dr. Vilasuso's preliminary findings indicated, among other items, that Defendant's sense of reality might be impaired and that Defendant suffered from a possible psychosis.

2. On December 25, 1984, Dr. Lloyd Miller, Forensic Psychiatrist, examined Defendant and filed a report which reflected a possible personality disorder and a fantasy life which is: "CLEARLY MORE ACTIVE THAN HIS SOCIAL LIFE." (emphasis supplied) Dr. Miller concluded that Defendant is [redacted] to stand trial despite his findings, including the fact that he learned that

Plea agreement

United States of America vs. **United States District Court for** SOUTHERN DISTRICT OF FLORIDA

DEFENDANT: KENNETH LANRF E BRYANT, 548 West 53rd Street

DOCKET NO. 84-726-Cr-PAINE

JUDGMENT AND PROBATION/COMMITMENT ORDER

COUNSEL: In the presence of the attorney for the government the defendant appeared in person on this date: February 21, 1985

[ ] WITHOUT COUNSEL

[X] WITH COUNSEL: Stewart Abrams, AFPD (Name of counsel)

PLEA: [XX] GUILTY, and the court being satisfied that there is a factual basis for the plea. [ ] NOLO CONTENDERE, [ ] NOT GUILTY

FILED by ____ D.C.
FEB 28 1985

FINDING & JUDGMENT: There being a finding/verdict of [ ] NOT GUILTY. Defendant is discharged [XX] GUILTY.

Defendant has been convicted as charged of the offense(s) of falsely impersonating a special agent of the federal government and acting as such, in violation of Title 18, U.S. Code, §912, as charged in Count 1 of the Indictment.

SENTENCE OR PROBATION ORDER:

Imposition of sentence of confinement be withheld and, pursuant to Title 18, U.S. Code, §5010(a) of the Federal Youth Corrections Act the defendant be placed on probation. It is further

ORDERED AND ADJUDGED as special condition of parolo, the deft is to get counseling and not be allowed to possess a gun.

SPECIAL CONDITIONS OF PROBATION

ADDITIONAL CONDITIONS OF PROBATION

COMMITMENT RECOMMENDATION

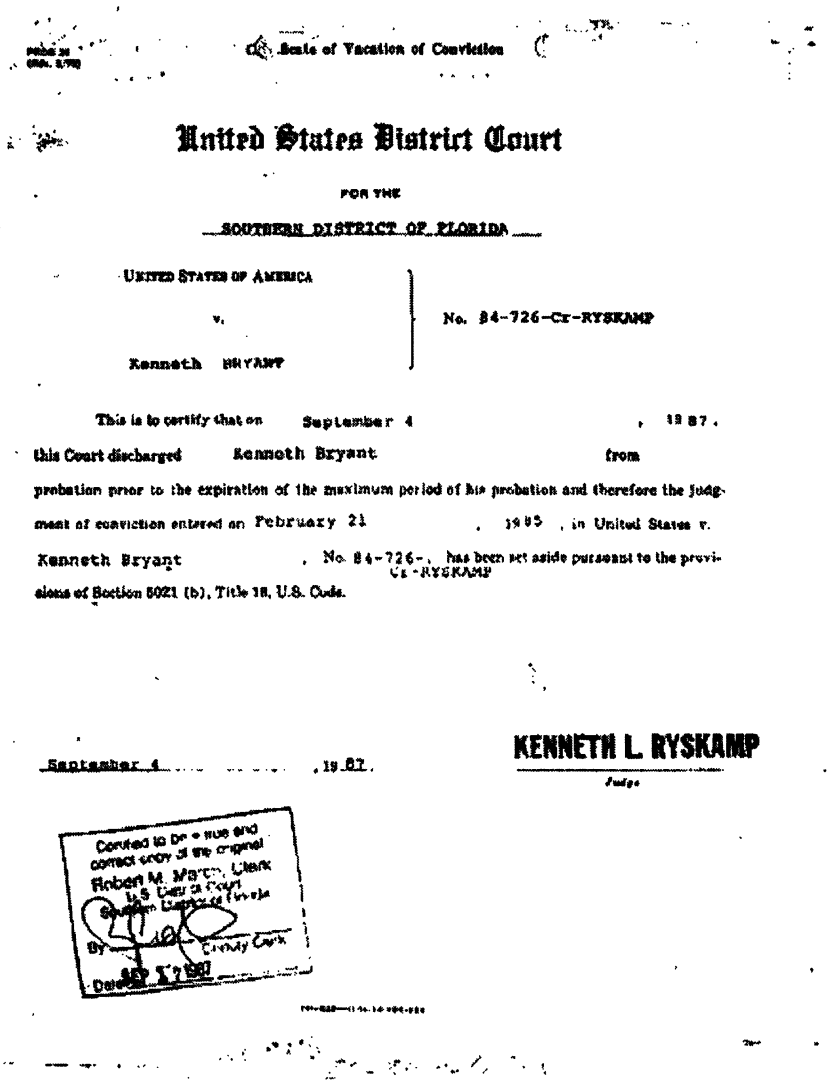
MAR 1 1985

SIGNED BY [X] U.S. District Judge [ ] U.S. Magistrate

JOE PAGON Date Feb. 27, 1985

Ken was sentenced to only probation and was prohibited from possessing a gun.

Vacation of Conviction



Seals of Vacation of Conviction

United States District Court

FOR THE

SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

v. No. 84-726-Cr-RYSKAMP

Kenneth BRYANT

This is to certify that on September 4, 1987,

this Court discharged Kenneth Bryant from

probation prior to the expiration of the maximum period of his probation and therefore the judgment of conviction entered on February 21, 1985, in United States v.

Kenneth Bryant, No. 84-726-Cr-RYSKAMP, has been set aside pursuant to the provisions of Section 5021 (b), Title 18, U.S. Code.

September 4, 1987.

KENNETH L. RYSKAMP

Judge

Certified to be a true and correct copy of the original
Robert M. Martin, Clerk
U.S. District Court
Southern District of Florida
By Deputy Clerk
Date SEP 17 1987

Ken was able to get his probation ended early in September 1987 and since he "kept his nose clean" as a youthful offender the conviction was set aside. He no longer had to answer he was a convicted federal felon.

Ken's attempt to seal the conviction

In 1996 (when he would be 32/33) Ken wanted the case files shredded. It would appear he was not successful filing pro-se (Lincoln saying of "He who represents himself has a fool for a client." seems to ring true).

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA, Plaintiff, v KENNETH I. BRYANT, Defendant	CASE NO. 84 0726 CR-RYSKAMP GOVERNMENT'S RESPONSE TO DEFENDANT'S PRO SE MOTION TO EXPUNGE THE CLERK OF COURT'S FILES AND RECORDS

COMES NOW, the United States of America, by and through the undersigned Assistant United States Attorney, and submits for the Court's consideration the instant Government's Response to Defendant's Pro Se Motion to Expunge the Clerk of Court's Files and Records. In opposition thereto, the government responds as follows:

I. BACKGROUND

An examination of the Court's case file[1] in this matter indicates the following: That on or about June 1?, 1984, the defendant, who was then a student at Florida International University (FIU), in Miami, Florida, falsely told a FIU police officer that he was an Special Agent of the Federal Bureau of Investigation (FBI), working out of the FBI Office in Miami,

[1] Records of the Federa Archives and Records Center indicate that the United States Attorney's Office's file with respect to this prosecution was destroyed in January of 1995, pursuant to standard procedure after ten years' retention in archives.

Defendant complains that although his FBI Identification Division arrest and conviction records have been expunged (which the government has confirmed through an NCIC criminal history check, that he is prejudiced by virtue of the files and records maintained by the Clerk of Court's Office for the Southern District of Florida. In essence, the defendant alleges that **he has been turned down for employment as a Special Agent with** federal law enforcement agencies **(e.g. the FBI and DEA) because** the existence of those records comes to the attention of federal investigators conducting applicant background checks, thus divulging his expunged/set aside criminal history.

Looking at his claims to be a federal agent, and working for the white house, I can't expect this would have been ok to work there with it on his record.

1. Archive.org of LinkedIn (https://web.archive.org/web/20220611030435/https://www.linkedin.com/authwall?trk=ripf&trkInfo=AQH76tZKvDd8FgAAAYFQuHW48_Op6NmK0_M3ZUTfrjO-_R4FknBRWIB2zTcFwMzmGyvpiC_S4lEkwPJq__TLhFVptonYxPm54R8hVavB-ir_qpwwZP2FqB5bzeTeSmBjhFAP3Uc=&original_referer=&sessionRedirect=https%3A%2F%2Fwww.linkedin.com%2Fin%2Fkennethlbryant%2F)

This page was last edited on 21 June 2022, at 20:03.

/mot/ - Motorola

Exhibit 8

Motorola Circle Jerk
Posting mode: Reply [Return]

Name

Email

Subject New Reply ☐ Spoiler Image

Wrap Spoiler (CTRL + S)

Comment

File Choose File No file chosen

Embed

Password RIaHR%jX (For file deletion.)

[Return / Go to bottom]

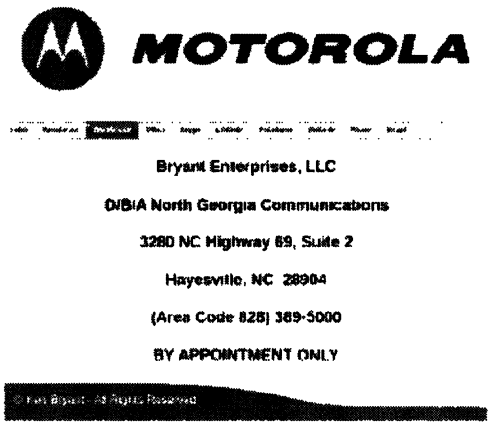
File: 1651359325613.png (511.03 KB, 750x749, Ken Bryant Immunity.png)

☐ Ken Bryant Anonymous 04/30/22 (Sat) 22:55:25 No.13

Anyone bought an Ion or other radio off Ken?
What did you get and what did you pay?
>>

☐ Anonymous 05/03/22 (Tue) 17:39:44 No.14

File: 1651599584623.png (56.08 KB, 553x520, Screenshot from 2022-05-03....png)

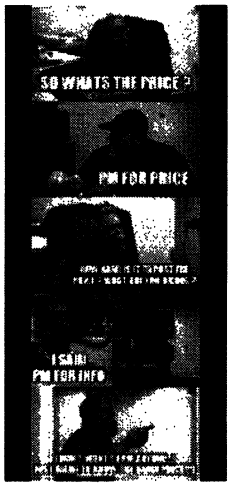


This guy?

>>

☐ Anonymous 05/06/22 (Fri) 04:35:09 No.16

File: 1651811709641.jpg (39.08 KB, 443x960, what's the price, ken?.jpg)



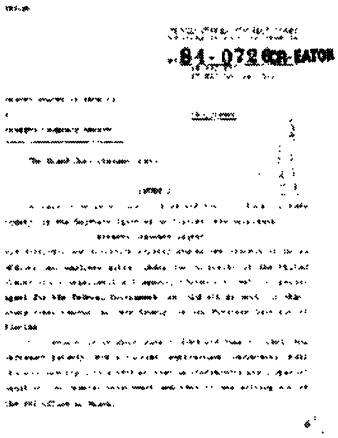
>>14

rofl, yup K1DMR. He's famous for telling you have to PM him online and won't discuss prices.

>>

☐ He's a felon too. Anonymous 06/11/22 (Sat) 05:29:12 No.18

File: 1654925352333.jpg (199.12 KB, 992x1200, page1-992px-1984-10-26_Gra....jpg)



>>16
Got this from the discord server lol

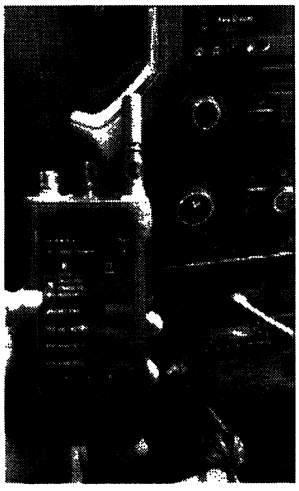
Ken Bryant Impersonation of Federal Agent Case 4-726-Cr-EATON

https://wiki.w9cr.net/index.php/Ken_Bryant_Impersonation_of_Federal_Agent

>>

☐ Anonymous 06/13/22 (Mon) 19:57:08 No.19

File: 1655150228305.png (397.25 KB, 415x685, Call38965.png)



>>18

do "Moto Dealers" even sell IONS to hams?

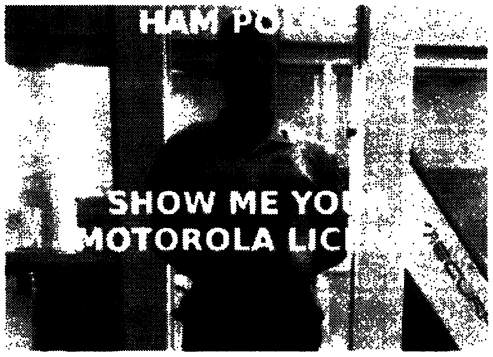
do they program Police channels for ham customers?

also, would someone post a YT video of their new ION programmed on PD channels clearly showing a "Moto Dealer" as a contact?

>>

☐ Anonymous 06/13/22 (Mon) 21:06:04 No.20

File: 1655154364479.png (188.24 KB, 768x558, notacopbutplaysoneonyoutub....png)



>>19

>>

☐ Anonymous 06/14/22 (Tue) 01:10:45 No.21

>>19

hah! I don't think many PDs use DMR anyways.

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[rules] [b / pol / s / kkk] [mot / ccp / f / h / q / qst / x] [home]

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Yotsuba B

STATE OF FLORIDA
DEPARTMENT OF STATE
Division of Licensing

AFFIDAVIT OF CHARACTER AND EXPERIENCE

(Must Be Completed By Other Than Applicant Or Relative Of Applicant)

Exhibit 9

State of Florida _____ County of DADE

I, Kenneth Goodman do swear and affirm that I am a resident

of the State of Florida residing in Dade County

at ** and that I am
Street City Zip

engaged in a as a Special Agent/Drug Enforcement Admat 8400 NW 53rd St. Miami, Fl. 33166.
(profession and/or business) (business address)

and I further affirm that I have known Kenneth Bryant
(applicant's name)

for the past 2.5 year(s), and to the best of my knowledge, memory and observation known him/her to be honest, competent, truthful, trustworthy, of good character, and bears a reputation for fair dealing. My telephone numbers are:

Home ( ) ** Business (305) 823-6149 . Furthermore the applicant to the best of my
Area Code Area Code

knowledge, has the following experience:

** Due to nature of my position, this info must remain confidential

---

I have known Ken Bryant for about 2.5 years and in this time he has demonstrated himself to be an honest, fair, law-abiding citizen. He is a very perceptive, aware individual who exercises discretion and good judgement in sensitive situations.

Ken Bryant, through independent investigation, has provided the Drug Enforcement Administration with intelligence relating to the smuggling and distribution of illegal drugs. He has also consulted with DEA regarding intelligence gathering programs in various technical matters especially those concerning communications security.

Ken Bryant 8-29-84 V/ PERMISSION

Kenneth Goodman
(Signature)

Sworn to and subscribed before me, the undersigned authority, at Miami in Dade County, Florida, this 29 day of August 1984

My Commission expires on NOTARY PUBLIC STATE OF FLORIDA BONDED THRU GENERAL INSURANCE UND MY COMMISSION EXPIRES APR 20 1986

/s/ Notary Public, State of Florida

DS-DL 5 (11-78)