

## UNITED STATES DISTRICT COURT

for the

District of Columbia

EQUITY INTERNATIONAL, INC.

*Plaintiff*

v.

WISE GAS, INC. and CHRISTINE SLAGER

*Defendant*

Civil Action No. 10 - 0995 (PLF)

## SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* CHRISTINE SLAGER  
 1473 Sunset Way,  
 Weston, FL 33327

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

John M. Shoreman  
 McFadden & Shoreman  
 1050 Connecticut Avenue, NW  
 Suite 1000  
 Washington, DC 20036  
 (202) 772-3188

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

7/23/2010

*Aa Janan Scott*  
 Signature of Clerk or Deputy Clerk

8/5/10 5:55 PM  
 BG SPS 1087

**UNITED STATES DISTRICT AND BANKRUPTCY COURT  
FOR THE DISTRICT OF COLUMBIA**

\_\_\_\_\_  
Plaintiff(s)  
  
v.  
  
\_\_\_\_\_  
Defendant(s)

Civil Action No. 10 0995 *PLF*

**CONSENT TO PROCEED BEFORE  
A UNITED STATES MAGISTRATE JUDGE FOR ALL PURPOSES**

In accordance with the provisions of 28 U.S.C. § 636(c)(3), the parties to the above-captioned civil matter by and with the advice of their counsel hereby voluntarily waive their rights to proceed before a District Judge of the United States District Court and consent to have a United States Magistrate Judge conduct any and all further proceedings in the case, including trial.

\_\_\_\_\_  
Attorney for the Plaintiff(s)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Attorney for the Defendant(s)

\_\_\_\_\_  
Date

NOTICE: The foregoing Consent by Counsel shall be accepted upon the understanding that all counsel have secured the consent of their respective clients to the Consent and Referral to a United States Magistrate Judge for all purposes.

**ORDER OF REFERENCE**

IT IS HEREBY ORDERED that the above-captioned matter be referred to a United States Magistrate Judge for all further proceedings and the entry of judgment in accordance with 28 U.S.C. § 636(c)(3) and the foregoing consent of the parties.

\_\_\_\_\_  
United States District Judge

\_\_\_\_\_  
Date

NOTE: RETURN THIS FORM TO THE CLERK OF THE COURT ONLY IF ALL PARTIES HAVE CONSENTED TO PROCEED BEFORE A UNITED STATES MAGISTRATE JUDGE.

**UNITED STATES DISTRICT AND BANKRUPTCY COURTS  
FOR THE DISTRICT OF COLUMBIA**

*ANGELA D. CAESAR*  
*Clerk of Court*

**NOTICE OF RIGHT TO CONSENT TO TRIAL  
BEFORE A UNITED STATES MAGISTRATE JUDGE**

The substantial criminal caseload in this Court and the requirements of the criminal Speedy Trial Act frequently result in the delay in the trial of civil cases. Aware of the hardship and expense to the parties, counsel, and witnesses caused by the delays which are beyond the control of the Court, this notice is to advise you of your right to trial of your case by a United States Magistrate Judge. By statute, 28 USC §636(c), Fed.R.Civ.P. 73 and Local Civil Rule 73.1, the parties, by consent, can try their case by means of a jury trial or bench trial before a United States Magistrate Judge. Appeals from judgments and final orders are taken directly to the United States Court of Appeals for the District of Columbia Circuit, in the same manner as an appeal from a judgment of a District Judge in a civil case.

**WHAT IS THE PROCEDURE?**

One of the matters you are required to discuss at the meet-and-confer conference mandated by Local Civil Rule 16.3 is whether the case should be assigned to a United States Magistrate Judge for all purposes, including trial

All parties must consent before the case is assigned to a Magistrate Judge for trial. You may consent at any time prior to trial. If you expressly decline to consent or simply fail to consent early in the case, you are not foreclosed from consenting later in the case. However, a prompt election to proceed before a Magistrate Judge is encouraged because it will facilitate a more orderly scheduling of the case.

Counsel for the plaintiff has been furnished a copy of the "Consent to Proceed Before a United States Magistrate Judge for all Purposes" form. If and when the form is executed, your response should be made to the Clerk of the United States District Court only.

**WHAT IS THE ADVANTAGE?**

The case will be resolved sooner and less expensively. The earlier the parties consent to assigning the case to a Magistrate Judge the earlier a firm and certain trial date can be established, even if the case is to be tried to a jury.

Upon the filing of the consent form and with the approval of the District Judge, the case will be assigned to all purposes to a Magistrate Judge.



# UNITED STATES DISTRICT AND BANKRUPTCY COURTS FOR THE DISTRICT OF COLUMBIA

## INITIAL ELECTRONIC CASE FILING ORDER

(Does not apply to pro se filers)

Subsequent filings in this case must be made electronically using the Court's Electronic Case Filing System (ECF) pursuant to Local Civil Rule 5.4.

ORDERED that counsel shall:

- Submit in paper, the original and copy of the complaint/notice of removal/petition for writ of habeas corpus and any accompanying papers (**not including summons and civil cover sheets**). Additionally, litigants are hereby required to provide those filings in PDF format on a floppy disk or CD-Rom compact disk. The disk should be clearly labeled with the case number (if known) and the name of the parties. If unable to deliver the filing on a disk at the time of the new case filing, counsel should e-mail the initiating document and accompanying papers to [dcd\\_cmecef@dcd.uscourts.gov](mailto:dcd_cmecef@dcd.uscourts.gov) by the close of business the day the new case was filed. Failure to supply electronic copies of the new case in a timely manner, will result in the attorney's name being added to the attorney non-compliant list and shared with the Court's ECF Judge's Committee. Regardless of what option counsel chooses, the complaint/notice of removal/petition for writ of habeas corpus and accompanying papers must come to the Court as PDF documents. Each exhibit to the new case shall be in a separate PDF file. Failure to submit PDF versions of the initiating documents will delay the opening of the case in ECF.
- Register, if not previously registered, to become an electronic filer by completing and returning the enclosed ECF Registration form found on the Court's Website at [www.dcd.uscourts.gov](http://www.dcd.uscourts.gov). The login and password are case specific and can be used for all cases.
- All subsequent filings **must** be made electronically.
- Have a PACER (Public Access to Court Electronic Records) account, in order to view dockets and documents. Call 800-676-6856 or visit [www.pacer.psc.uscourts.gov](http://www.pacer.psc.uscourts.gov) for additional information.
- Schedule a training class at the Courthouse by going to the Court's ECF Internet Website [www.dcd.uscourts.gov/ecf.html](http://www.dcd.uscourts.gov/ecf.html). Also, filing instructions and an interactive tutorial can be found at this Internet Website.
- Pursuant to Local Civil Rule 5.4(b)(2), a pro se litigant may file a motion requesting permission to file documents electronically. See the rule for specific directions and requirements.

**FRIEDMAN, J. PLF**

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UNITED STATES DISTRICT JUDGE

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**United States District Court  
For The District of Columbia**

**ELECTRONIC CASE FILES  
ATTORNEY/PARTICIPANT REGISTRATION FORM**

**LIVE SYSTEM**

This form shall be used to register for an account on the Court's Electronic Case Files (ECF) system and to subscribe to the ECF email (Listserver) notification service. Registered attorneys and other participants will have privileges both to electronically submit documents, and to view and retrieve electronic docket sheets and documents for all cases assigned to the Electronic Case Files system. Listserver subscribers receive email messages whenever the Court wishes to electronically notify ECF registrants of pertinent ECF information.

The following information is required for registration:

If you are appointed pro bono or pro hac vice, please provide the case number:

\_\_\_\_\_

First Name/Middle Initial/Last Name: \_\_\_\_\_

Last four digits of Social Security Number: \_\_\_\_\_

DC Bar ID#: \_\_\_\_\_

Firm Name: \_\_\_\_\_

Firm Address \_\_\_\_\_

\_\_\_\_\_

Voice Phone Number: \_\_\_\_\_

FAX Phone Number: \_\_\_\_\_

Internet E-Mail Address: \_\_\_\_\_

By submitting this registration form, the undersigned agrees to abide by the following rules:

1. This system is for use only in cases permitted by the *U.S. District Court for the District of Columbia*. It may be used to file and view electronic documents, docket sheets, and notices. Please visit the Court's ECF Internet Website to schedule training.
2. Pursuant to Federal Rule of Civil Procedure 11, every pleading, motion, and other paper (except list, schedules, statements or amendments thereto) shall be signed by at least one attorney of record or, if the party is not represented by an attorney, all papers shall be signed by the party. An attorney's/participant's password issued by the court combined with the user's identification, serves as and constitutes the attorney's/participant's



signature. Therefore, an attorney/participant must protect and secure the password issued by the court. If there is any reason to suspect the password has been compromised in any way, it is the duty and responsibility of the attorney/participant to immediately notify the court. This should include the resignation or reassignment of the person with authority to use the password. The Court will immediately delete that password from the electronic filing system and issue a new password.

3. An attorney's/participant's registration will not waive conventional service of a summons and complaint, subpoena, or other judicial process; submit the client to the jurisdiction of the Court; or operate as a consent to accept service of pleadings, documents, and orders in actions in which such attorney/participant has not entered an appearance. An attorney's/participant's registration will constitute a waiver in law only of conventional service of other non-process pleadings, documents, and orders in the case. The attorney/participant agrees to accept, on behalf of the client, service of notice of the electronic filing by hand, facsimile or authorized e-mail.
4. Upon receipt of your login and password, you are strongly encouraged to change your password, which may be done through the Utilities function, to a name easily recalled. You may be subjected to a fee, should the Clerk's Office have to create a new password for you, or alternatively, you may be required to appear in person to receive your new password.
5. Attorneys must be active members of the bar of this Court, or government attorneys who are employed or retained by the United States, or who have been permitted to proceed pro hac vice, must file pleadings electronically.
6. Whenever a filer's e-mail address changes, the user agrees to update their ECF profile to show the new e-mail address. The system is robust enough to permit counsel to change their own e-mail address within the ECF System. Effective December 9, 2008, pursuant the directions from the Court's Information Technology Committee, the Clerk's Office will no longer monitor bounced e-mails.

Please return this form to: U.S. District Court for the District of Columbia  
Attn: Attorney Admissions  
333 Constitution Avenue NW, Room 1825  
Washington, DC 20001

**Or FAX to: Peggy Trainum**  
U.S. District Court for the District of Columbia  
(202) 354-3067

Applicant's Signature: \_\_\_\_\_

\_\_\_\_\_  
Full Last Name

\_\_\_\_\_  
Initial of  
First Name

\_\_\_\_\_  
Last 4 Digits SS#

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**EQUITY INTERNATIONAL, INC.**  
1455 Pennsylvania Avenue, NW, 4<sup>th</sup> Floor,  
Washington, DC 20004,

Plaintiff,

v.

**WISE GAS, INC.**

Registered Agent: Christine Slager  
1473 Sunset Way  
Weston, FL 33327

and

**CHRISTINE SLAGER**

1473 Sunset Way  
Weston, FL 33327

Case No. \_\_\_\_\_

**JURY TRIAL DEMANDED**

Case: 1:10-cv-00995  
Assigned To : Friedman, Paul L.  
Assign. Date : 6/15/2010  
Description: General Civil

**COMPLAINT**

COMES NOW the plaintiff, EQUITY INTERNATIONAL, INC., by and through counsel, and complains of the defendants WISE GAS, INC. and CHRISTINE SLAGER, as follows.

1. The plaintiff Equity International, Inc. ("Equity") is located in, and operates from, the District of Columbia. Equity is an event coordinator that facilitates the involvement of the corporate sector in issues of homeland security, global reconstruction, emergency management, and disaster response. Equity has successfully organized more than 100 national and international conferences, involving more than 35,000 government, business, education, and non-profit leaders.

2. The defendant Wise Gas, Inc. ("Wise Gas"), is a corporation organized under the laws of Florida. Upon information and belief, it is engaged in the promotion and distribution of

compressed natural gas and other alternative fuels. Upon information and belief, the defendant Christine Slager is a principal owner, officer and director of Wise Gas.

3. The Court's jurisdiction is based on diversity of citizenship. 28 U.S.C. § 1332. The amount in controversy exceeds \$75,000. Venue is proper since the acts and injuries giving rise to this Complaint occurred in this District and the defendants are subject to the personal jurisdiction of this Court. 28 U.S.C. §§ 1391(a)(2) and (3); D.C. Code § 13-423.

4. The defendants are engaged in a vicious and unjustified, internet-based, campaign of abuse, harassment, libel and innuendo against Equity with the explicit goal of destroying the existing and future business relationships of Equity.

5. The defendants have published, and continue to publish, highly-offensive and false statements concerning Equity and its CEO, William Loiry, on a website they created for the specific purpose of damaging Equity in its business and reputation:

[williamloiryequityinternational.blogspot.com](http://williamloiryequityinternational.blogspot.com) (the "blogspot"). The blogspot is captioned:

A blog dedicated to pursuing justice against Bill Loiry (aka William Loiry) and his 'company' Equity International – by the countless people he has ripped off, scammed, taken advantage of and more. Don't do business with Loiry without being forewarned.

6. Unfortunately, the defendants have now succeeded in damaging the reputation and business of Equity to a significant degree. As a direct and proximate cause of the false and defamatory statements posted on the blogspot, Equity has suffered, and continues to suffer, substantial lost revenues from existing clients, and has been frustrated in its ability to attract and maintain new clients. Every initiative and project that Equity engages in becomes the subject of ridicule and contempt on the defendants' blogspot. Equity has been forced to deal with embarrassing inquiries from existing and potential clients concerning the derogatory statements on the blogspot.



7. More recently, numerous existing clients (former event sponsors, event underwriters and attendees), who Equity relies on to operate and to generate the revenues necessary to stage successful forums and events, have chosen to terminate their association with Equity as a direct result of the blogspot. Furthermore, as a direct result of the blogspot, Equity has also lost future clients and business opportunities. These future business relationships would have resulted in substantial revenue to Equity for years to come.

8. The defendants' actions are undertaken with a malicious intent to injure Equity in its reputation and business. Wise Gas and Slager, acting in conspiracy and concert, have demonstrated a willful and wanton disregard for the consequences of their actions to Equity.

9. Upon information and belief, the defendants are motivated to injure Equity, in what amounts to a vendetta, because of a business dispute involving less than \$5,000. The defendants have refused all reasonable settlement efforts regarding this dispute. Wise Gas and Slager, acting in conspiracy and concert, are using the blogspot in a form of extortion: If Equity refuses to pay their unjustified demands, they will continue to bombard the internet with vicious and false attacks on Equity to inflict maximum injury to Equity's business. The attacks against Equity are entirely unjustified. The damage caused to Equity, an enterprise whose public image is vital to its success, is substantial and continuing in nature.

**COUNT I**  
**(Tortious Interference with Business Relationships)**

10. The plaintiff repeats and re-alleges paragraphs 1 through 9 as though fully set forth herein.

11. The defendants, jointly and severally, intentionally and maliciously interfered with Equity's business relationships.

12. The defendants were at all times aware of the existence of Equity's business relationships. At certain times, the defendants communicated directly with Equity's business relationships.

13. It was commercially reasonable for Equity to anticipate a continuation of its business relationships absent unjustified interference by the defendants.

14. The defendants' false and unjustified attacks on Equity in the blogspot and elsewhere, for the purpose of forcing Equity to pay an unjustified demand, was the direct and proximate cause of Equity's loss of business relationships.

15. The defendants acted intentionally with malice and ill-will towards Equity.

WHEREFORE, Equity prays for judgment against the defendants, jointly and severally, for compensatory damages in an amount not less than \$500,000; punitive damages in an amount not less than \$2,000,000; in addition to attorneys fees, costs and such other relief as the Court deems appropriate.

**COUNT II**  
**(Tortious Interference with Future Business Relationships)**

16. The plaintiff repeats and re-alleges paragraphs 1 through 15 as though fully set forth herein.

17. The defendants, jointly and severally, intentionally and maliciously interfered with Equity's future business relationships.

18. The defendants were at all times aware of the existence of Equity's future business relationships. At certain times, the defendants communicated directly with Equity's future business relationships.

19. It was commercially reasonable for Equity to anticipate the creation of valid business relationships absent the unjustified interference by the defendants.

20. The defendants' false and unjustified attacks upon Equity in the blogspot and elsewhere, for the purpose of forcing Equity to pay an unjustified demand, was the direct and proximate cause of Equity's loss of the future business relationships.

21. The defendants acted intentionally with malice and ill-will towards Equity.

WHEREFORE, Equity prays for judgment against the defendants, jointly and severally, for compensatory damages in an amount not less than \$500,000; punitive damages in an amount not less than \$2,000,000; in addition to attorneys fees, costs and such other relief as the Court deems appropriate.

**COUNT III**  
**(Commercial Defamation)**

22. The plaintiff repeats and re-alleges paragraphs 1 through 21 as though fully set forth herein.

23. The defendants, jointly and severally, made repeated false and defamatory statements concerning Equity and its principal, William Loiry. The false and defamatory statements concerning William Loiry were purposely intended to, and did, reflect discredit upon the method by which Equity conducts its business.

24. The defendants published the false and defamatory statements to third parties without privilege or justification.

25. The defendants acted with malicious intent in publishing the false and defamatory statements.

26. The false and defamatory statements constitute libel *per se*, and, further, resulted in direct and special harm to Equity in the form of lost revenues and clients, present and prospective.



27. The false and defamatory statements injure Equity in its trade and business and hold it up to contempt and ridicule in its community without justification.

28. The defendants acted intentionally with malice and ill-will towards Equity.

WHEREFORE, Equity prays for judgment against the defendants, jointly and severally, for compensatory damages in an amount not less than \$500,000; punitive damages in an amount not less than \$2,000,000; in addition to attorneys fees, costs and such other relief as the Court deems appropriate.

**COUNT IV**  
**(Commercial False Light)**

29. The plaintiff repeats and re-alleges paragraphs 1 through 28 as though fully set forth herein.

30. The false and defamatory statements published by the defendants on the blogspot places Equity in a false light which would be highly offensive to a reasonable person.

31. The defendants had knowledge of, or acted in reckless disregard of the falsity of the publicized matter and the highly-offensive, false light in which Equity would be placed.

32. The defendants acted intentionally with malice and ill-will towards Equity.

WHEREFORE, Equity prays for judgment against the defendants, jointly and severally, for compensatory damages in an amount not less than \$500,000; punitive damages in an amount not less than \$2,000,000; in addition to attorneys fees, costs and such other relief as the Court deems appropriate.

**COUNT V**  
**(Injunction)**

33. The plaintiff repeats and re-alleges paragraphs 1 through 32 as though fully set forth herein.

34. The unjustified and injurious acts of the defendants are continuing in nature. The blogspot is continuously being published and disseminated throughout the country and in Equity's business community within the District of Columbia.

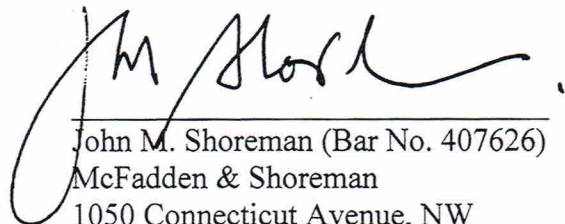
35. Equity is suffering and will continue to suffer irreparable harm unless publication of the blogspot is enjoined temporarily and permanently.

36. Equity lacks an adequate remedy at law.

WHEREFORE, Equity prays the Court to enjoin the defendants' publication of the blogspot, both temporarily and permanently; in addition to an award of Equity's attorneys fees, costs and such other relief as the Court deems appropriate.

Dated: June 11, 2010

Respectfully submitted,



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