

FILED
03-22-2019
CIRCUIT COURT
DANE COUNTY, WI
2018CV003122

STATE OF WISCONSIN CIRCUIT COURT DANE COUNTY

LEONARD POZNER

Plaintiff,

v.

Case No. 2018-CV-003122

**JAMES FETZER,
MIKE PALECEK, and
WRONGS WITHOUT WREMEDIES, LLC.**

Defendant(s).

COUNTERCLAIM OF WRONGS WITHOUT WREMEDIES, LLC

Counterclaim Plaintiff, Wrongs Without Wremedies, LLC, hereby alleges a Counterclaim for damages against the Counterclaim Defendant Leonard Pozner and hereby alleges as follows:

DEFENDANT WRONGS WITHOUT WREMEDIES, LLC COUNTERCLAIM

PARTIES

1. Wrongs Without Wremedies, LLC, is a limited liability company, duly organized and existing under the laws of the state of Florida, and is a Defendant herein.

2. Counterclaim Defendant Leonard Pozner is a resident of the state of Florida and is a Plaintiff herein.

JURISDICTION AND VENUE

3. Substantial and not isolated acts giving rise to the cause of action for Abuse of Process asserted herein, have occurred in the State of Wisconsin and within this venue.

4. This Court has jurisdiction over both the parties and the subject matter because on information and belief a substantial number of events giving rise to this Counterclaim for Abuse of Process occurred in Dane County. On information and belief and with knowledge of the falsity of the allegations in his Complaint, Counterclaim Defendant Mr. Pozner altered, changed, modified and then circulated and delivered an alleged death certificate for his son Noah Pozner in 2015 to a woman by the name of Kelley Watt. Thereafter, on or about November 27, 2018, Leonard Pozner then took a different death certificate and attached it to his Complaint in this action and has alleged herein that the death certificate attached to his Complaint in this action is the true, correct and genuine death certificate in his Complaint, despite the fact that the two death certificates are obviously different.

FACTUAL BACKGROUND

5. On December 14, 2012, in Newtown, Connecticut, agents of the federal, state and local municipal authorities conspired to stage an elaborate hoax. Counterclaim Defendant Leonard Pozner was a co-conspirator in the effort to stage the Sandy Hook Elementary School (hereinafter "SHES") mass murder by an alleged psychologically disturbed young man by the name of Adam Lanza, who allegedly stole several guns from his mother, then shot his mother in her bed and then drove the family car to SHES, where he forcibly entered the school by shooting out the front glass door, and then entered SHES and murdered 20 students and six administrators and teachers. Counterclaim Defendant Leonard Pozner maintains that his son Noah Pozner was killed in this shooting incident.

6. Upon closer examination, investigation, and study by concerned citizens, including but not limited to the within Counterclaim Plaintiff, it was discovered that the alleged SHES mass

murder never actually occurred as it was presented by the mainstream media. This discovery was caused by the examination of a large body of circumstantial evidence, including but not limited to the following:

- a) Photographs demonstrate that, although a large hole was blown in the plate-glass window of SHES, it does not appear to have been done by any of the weapons purportedly in the possession of the alleged shooter, nor did anyone actually enter SHES through that hole, although at least 10 Connecticut State Police have signed sworn affidavits of having entered by means of it.
- b) Media helicopters taking aerial footage of the event on December 14, 2012, took pictures of the triage tarps on the ground outside of SHES, but despite that allegations that 26 people were struck by bullets and killed, not a single human body was photographed being placed on any of the triage tarps.
- c) Federal Emergency Management Agency (FEMA) appears to have managed the event, including placing Porta-a-Potties and signage at the scene, and directing the participants as to where they should report to participate in the event.
- d) Pizza and bottled water were supplied at the scene, so that the participants could snack and drink, while awaiting their turn to be filmed and photographed at the alleged emergency event, much like at a Hollywood location film shoot.

- e) News footage of participant and co-conspirator Robby Parker is seen at first laughing and smiling, before hyperventilating to “get into character” of the distraught parent who suffered the loss of a child, before Mr. Parker gives a speech regarding his sorrow at the alleged loss of his daughter.
- f) Photographs of the scene of the alleged mass murder, reveal at least two photographs were taken, one showing parents present at the scene, while a uniformed policewoman is repositioning the schoolchildren being led away from SHES to get “a better shot.”
- g) Investigation later revealed that by December 14, 2012, SHES had actually been closed since 2008, and the inactive school buildings were being used to “stage” the alleged SHES mass murder.
- h) H. Wayne Carver II, M.D., then-chief state medical examiner, stated that the parents of the deceased children were identified by photographs, as opposed to direct observation and identification of the bodies of the children, which appears to have been done because the children only existed in the form of photographs, as subsequent research has shown, some of which appears in “Sandy Hook Truth: A Sandy Hook Collected Memorandum for the President of the United States” (2018), edited by Robert David Steele and available online.
- i) Other and further circumstantial evidence of this staged event exists and will be developed in discovery, including “The FEMA Manual for Sandy Hook,” published as Appendix A to *Nobody Died At Sandy Hook: It was a FEMA Drill to Promote Gun Control*, which is confirmed by the presence of the sign, refreshments and restrooms, and participants

wearing name-tags on lanyards, which are standard practices for conducting FEMA drills, and by the absence of a surge of EMTs into the building, the lack of a string of ambulances to rush the bodies off to hospitals where they could be declared to be dead or alive, the failure to call a Med-Evac chopper, which is normally done even for drills, and a host of other indications, many of which appear in the publications cited above and elsewhere.

7. This elaborate staged mass media event was “produced” to advance an agenda to deprive U.S. citizens of their rights pursuant to the Second Amendment of the U.S. Constitution.

8. The death certificate that Plaintiff Pozner attached to his Complaint differs substantially from the death certificate Plaintiff previously sent to Kelley Watt, insofar as, unlike that version, it has a (handwritten) file number, does not have a bottom two-thirds darker in texture than the top one-third, and the box for decedent’s Social Security number is blank, while the same box in the copy sent to Kelley Watt was blacked out in an apparent effort to conceal that decedent does not have (or was never assigned) a Social Security number. Additionally, the document attached to Plaintiff’s Complaint shows several changes attributed to “father Leonard Pozner,” even though the name of the father on the certificate proper is “Lenny Pozner.” They are not the same.

9. After having investigated the alleged SHES mass murder of December 14, 2012, Defendants James Fetzer and Mike Palecek, published in 2015 a book entitled *Nobody Died At Sandy Hook: It was a FEMA Drill to Promote Gun Control* (with 13 contributors, including six current or retired Ph.D. professors), establishing that the school had been closed by 2008, that there were no students there, and that it was a FEMA drill to promote gun control in which nobody died.

A second edition of the book was published in 2016 by James Fetzer, Mike Palecek and Wrongs Without Wremedies, LLC.

10. Plaintiff Leonard Pozner claims to have been defamed by the publication of the books *Nobody Died At Sandy Hook: It was a FEMA Drill to Promote Gun Control*, specifically for Defendant Fetzer having described the death certificate given to Kelley Watt as a “fabrication,” and filed this lawsuit for defamation, when in truth and in fact, Leonard Pozner knows that the SHES shooting was an elaborate staged event, wherein no one was killed on December 14, 2012.

**FIRST CAUSE OF ACTION
ABUSE OF PROCESS**

11. Counterplaintiff incorporates by this reference all allegations contained within this Counterclaim into this cause of action for Abuse of Process as though said allegations have been set out fully and at length herein, and further alleges as follows:

12. On or about November 27, 2018, Leonard Pozner initiated litigation in this Court against James Fetzer, Mike Palecek and Wrongs Without Wremedies, LLC, with alleged causes of action for defamation and conspiracy against the Defendants. Plaintiff Leonard Pozner intentionally filed and served said lawsuit for defamation and conspiracy on said Defendants, despite his knowledge that his son Noah Pozner was not killed in the SHES shooting on December 14, 2012.

13. Leonard Pozner’s acts, by filing and serving a lawsuit which he knows contains false allegations regarding the alleged killing of his son Noah Pozner and the alleged issuance of a death certificate, was performed and accomplished for the improper purpose of sustaining the

false belief by citizens of the State of Wisconsin and of the U.S. that a child massacre had been perpetrated by a mentally disturbed individual on December 14, 2012, who allegedly took possession of his mother's legally obtained firearms and then went on a killing spree at SHES. This deceptive filing and service of a defamation lawsuit was specifically used to accomplish and obtain the collateral advantage of sustaining the "Sandy Hook Hoax" to advance an agenda to curtail or eliminate the rights of the citizenry of the U.S. to bear arms pursuant to the Second Amendment to the U.S. Constitution.

WHEREFORE:

Counterclaim Plaintiff prays as follows:

- A) For declaratory relief, determining that the death certificate circulated by Leonard Pozner in 2015 was altered, changed and contrived by Leonard Pozner.
- B) For damages and attorney fees incurred by all Counterclaim Plaintiff's made necessary by the defense of the within action.
- C) For costs of suit herein.
- D) For such other and further relief as the Court deems just and proper.

Dated: March 21, 2019

By: 

Alexander J. Petale, Esq., for Wrongs
Without Remedies, LLC, Counterclaim
Plaintiff

PROOF OF SERVICE BY EMAIL

I am employed in the county of Los Angeles, I am over the age of 18 years and not a party to this action. My business address is 504 S. Alvarado St., No. 207, Los Angeles, CA 90057., my email address is: petaleesq@gmail.com

On : March 21, 2019 I served the documents described as: Counterclaim of Counter Plaintiff Wrongs Without Wremedies, LLC., in the matter of POZNER v. Fetzer, et al., Dane County Court Case No, 18CV3122 Wisconsin Circuit Court

I served the above described document on:

- 1) Jacob Zimmerman, Attorney at Law at email: jake@zimmerman-firm.com
- 2) Dr. James Fetzer at email: jfetzer@d.umn.edu
- 3) Mr. Mike Palecek at email: nwestiowa@gmail.com
- 4) Reed Peterson, Attorney at Law at email : reed@peterson.com

By Mail:

_____, I deposited such envelopes in the mail at Los Angeles, California, 90036, the envelop was mailed with first class postage thereon, fully prepaid.

_____, I am readily familiar with this firm's practice for collection and processing correspondence for mailing. Under that practice the above described documents would be deposited in the US Mail on that same day with postage thereon, first class, fully prepaid, in the ordinary course of business. I am aware that on motion of the party affected that service is presumed invalid if the postage meter date or postmark is more than one day after the date stated for deposit in the mail thereon.

By Personal Delivery

_____, I caused to be delivered the above described documents, by hand to the address shown above on the date stated herein.

By FAX Transmission to FAX No.

BY EMAIL: _XXXX_. Pursuant to Stipulation of all parties herein

I declare, under penalty of perjury, under the laws of the state of California that the foregoing is true and correct.

Dated: March 21, 2019

By: _____

Alexander J. Petale, Esq.

