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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10 REZA GANJAVI,)

11)
12) **Plaintiff,**)

13 v.)

14 Douglas Carlson, William)
15 Jennings, Todd Tipton, et. al.)

16)
17) **Defendants.**

Case Number:

CV05- 8619 DDP (JWJx)

**DOE AMENDMENT - new named
defendant: JEREMY SMITH**

17 1. As per the April 6, 2006 declaration of the Custodian of Records for the
18 internet service provider, RCN Corporation, it is now proven that two
19 defendants previously referenced by DOE2 and DOE5, and subsequently by
20 "Official Moderator" and "Howard" respectively, are indeed one and the same
21 person with the following name and address:

- 22 • **Jeremy Smith**, 605 West Madison Street, Apt. 4811 Chicago, IL, 60661
23 (IP address: 24.148.29.235; ISP: RCN).

24 2. Therefore, Plaintiff hereby amends the defendants list / Doe declarations
25 of the case at bar to reflect Jeremy Smith as a named Defendant and removes
26 the two designations specified above, i.e., "Official Moderator" and
27 "Howard", which were previous substitutions for DOE2 and DOE5 respectively.
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1 **DOE DEFENDANTS REMAINING:**

2 3. Remaining DOE defendants therefore, are as follows:

- 3 • DOE1 - "John Ed Gore" <gore0026@3dm.net> -- (TimeWarner)
- 4 • DOE3 - "Cybertroll Administrator" <root@rezaworld.com> -- (Nntpserver)
- 5 • DOE4 - "Cyber Troll" <trollcyber@whitehouse.gov> -- (Nntpserver)
- 6 • DOE6 - "Rosa Bonjovi" <rosas_panties@yahoo.co.uk> -- (Deloitte)
- 7 • DOE 7 TO 10 - unnamed.

8 4. The information on Jeremy Smith was released by the Defendant's ISP which
9 was subpoenaed by the Plaintiff. Subsequently, an attorney from a Freedom of
10 Speech protection organization contacted the Plaintiff to determine the
11 degree of evidence available to substantiate the allegations. Upon such
12 examination the decision was apparently made to not quash the subpoena.

13 5. Mr. Smith is a key defendant who has been referred to in the Complaint
14 and Exhibit 5 (evidence document) by several aliases including: "Roza
15 Ganjavi", "Howard", "Cyber Troll". Furthermore, in response to another
16 subpoena, on 23 January, 2006, Yahoo Incorporated's Custodian of Records
17 confirmed that the same Defendant was responsible for setting up a mock
18 website (Geocities) as discussed in the Complaint. As demonstrated in the
19 Complaint, this Defendant is linked to other offences through using other
20 service providers which have been subpoenaed such as Nibble Information
21 Systems (using for example the alias: "Official Moderator"), and Deloitte
22 using various aliases. He also orchestrated other offences that have been
23 documented in the Complaint, including evidentially using Plaintiff's
24 identity to make racial slurs at African Americans and to sympathize with
25 terrorists.

26 sincerely,

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28 Reza Ganjavi