

1 Stanislav Arbit
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6 Plaintiff

7
8 THE SUPERIOR COURT OF CALIFORNIA
9 COUNTY OF LOS ANGELES
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13)
14)
15 **Stanislav Arbit,**
16 **Plaintiff**

17)
18 **v.**
19)

20 **Mark Elliot Zuckerberg,**
21 **Defendant.**
22)

) Case:
)
) **STALKING CONSPIRACY &**
) **DEFAMATION CONSPIRACY**
) (Civ. Code, §§ 1708.7 and 44–47)
)
) **INJUNCTION AND DAMAGES**
)
) **JURY DEMAND**

23)
24)
25) Complaint Filed:
26)
27)
28)

1 **I. PARTIES, JURISDICTION, AND VENUE**

2 1. This court has personal jurisdiction over Defendant, Mark Elliot Zuckerberg,
3 because his primary residence is in California.
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5 2. Stanislav Arbit’s primary residence is in California.

6 3. The Superior Court of California has subject-matter jurisdiction for Civil Code §
7 1708.7 and §§ 44–47.
8

9 4. The venue is proper because all of the causes of action and most of the events
10 occurred in Los Angeles County.
11

12 **II. FACTUAL ALLEGATIONS**

13 5. It is within my belief and knowledge that the defendant is a principal in a fifth-
14 column network that conspires to target Americans, who do not have utility to them,
15 to remove them from society by any available means, including murder.
16

17 6. Plaintiff is a former contingent worker at Facebook, Inc. Facebook, Inc. is
18 operated by the defendant. Plaintiff believes he was targeted because of this
19 relationship.
20

21 7. Defendant’s program can be described as Full Cycle Human Resource
22 Management (FCHRM). FCHRM is analogous to a washing machine cycle.
23 FCHRM’s cycle is approximately one year. And much like a washing machine, most
24 of the time is spent in the agitation phase. During the agitation phase, the Defendant
25 has tried to agitate, frighten, confuse, and mobilize the plaintiff.
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1 8. Around the one-year mark, they force the victim, or in this case, they forced me
2 out of housing and employment. This is the drain and spin phase. At this point, you
3 are on the run and exhaust your resources. If you are able to settle back into housing
4 and gain income the cycle will start again.

6 9. The goal, and eventual result, is to have the victim's savings drained, all credit
7 exhausted, and for the victim's resume to have a long gap in employment. At this
8 point, the victim is essentially boxed in.

10 10. Defendant uses patterns as his criminal signature—employing various motifs to
11 string individual events together.

13 11. Most days contain multiple events, and it is rare for a day to go by without an
14 event.

16 12. Defendant spies on the plaintiff and reflects gathered intelligence in his
17 choreographed field performances and direct inauthentic interactions with Plaintiff.

18 13. While permanent removal of the victim is the primary goal, the secondary goal
19 is complete isolation from society, and the tertiary goal is being blocked from
20 housing and employment. But any inconvenience, insult, manipulation, or scam, no
21 matter how slight, is an achievement to the defendant and his network of
22 coconspirators.

24 14. The scheme is highly organized, resource intensive, and typically coupled with
25 plausible deniability, and whenever possible, blame is shifted through
26
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1 misinformation. The underlying mechanics of this novel setup are, by design,
2 difficult to express. The sheer complexity of their over-engineered system serves as
3 a cover for their criminal enterprise.
4

5 15. Defendant maliciously defamed Plaintiff with the goal of precluding him from
6 gaining employment in any field or industry.
7

8 16. Defendant maliciously defamed Plaintiff with the goal of critically damaging his
9 business.
10

11 17. Defendant has made credible threats and Plaintiff believes Defendant has and
12 will continue to conspire to cause the plaintiff great bodily harm and death.
13

14 **III. FIRST CAUSE OF ACTION: STALKING**

15 **(Civ. Code, § 1708.7)**

16 18. The allegations in previous paragraphs are incorporated herein by reference.

17 19. Defendant, Mark Elliot Zuckerberg, is a principal in a conspiracy to stalk the
18 plaintiff, Stanislav Arbit.
19

20 20. The Stalking was planned and executed with Defendant's vast network.

21 Defendant is vicariously liable for all of the actions of the conspiracy because he
22 was an active participant who was involved in the planning of the stalking and
23 agreed with his network to commit acts of stalking and intended that stalking be
24 committed.
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1 21. The defendant engaged in a pattern of conduct the intent of which was to follow,
2 alarm, place under surveillance, and harass the plaintiff.

3
4 22. As a result of that pattern of conduct the plaintiff reasonably feared for his
5 safety, and for the safety of an immediate family member.

6 23. The plaintiff suffered substantial emotional distress, and the pattern of conduct
7 would cause a reasonable person to suffer substantial emotional distress.

8
9 24. The defendant, as a part of the pattern of conduct specified in Section II, made a
10 credible threat with the intent to place the plaintiff in reasonable fear for his safety.

11
12 25. The defendant, as a part of the pattern of conduct specified in Section II, has
13 acted with reckless disregard for the safety of the plaintiff.

14
15 26. In response to the threat in paragraph 24, Plaintiff applied for two TROs.
16 Defendant had knowledge of these applications.

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18 **IV. SECOND CAUSE OF ACTION: DEFAMATION**

19 **(Civ. Code, §§ 44–47)**

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21 27. The allegations in previous paragraphs are incorporated herein by reference.

22 28. Defendant, Mark Elliot Zuckerberg, is a principal in a conspiracy to defame the
23 plaintiff, Stanislav Arbit.

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25 29. The defamation was planned and executed with Defendant's vast network.

26 Defendant is vicariously liable for all of the actions of the conspiracy because he
27 was an active participant who was involved in the planning of the defamation and
28

1 agreed with his network to commit acts of defamation and intended that defamation
2 be committed.

3
4 30. Because of the Defamation Plaintiff was harmed in his business and profession.

5 31. Defendant acted with malice, oppression, and fraud.

6 **V. PRAYER FOR RELIEF**

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8 32. Plaintiff requests general damages according to proof.

9 33. Plaintiff requests punitive damages in an amount to be determined by the Court
10 according to proof.

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12 34. Plaintiff requests any and all other relief the Court deems just and proper.

13 35. Plaintiff also requests reasonable attorney fees and interest on all damages.

14 **VI. JURY TRIAL DEMAND**

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16 36. Plaintiff respectfully demands a trial by jury on all claims and issues so triable.

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19 Respectfully submitted,

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23 By: Stanislav Arbit

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