

Claim Form

In the High Court of Justice Queen's Bench Division

	for court use only
Claim No.	TR10X03453
Issue date	1 3 SEP 2010

Claimant

EUROPEAN RAELIAN MOVEMENT 27 Holywell Row London EC2A 4JB

Defendant(s)

Joseph Ratzinger also known as Benedict XVI



Brief details of claim

This is a claim for Tortious Interference in Business Affairs by Benedict XVI who personally orchestrated a campaign of disinformation, retaliation and interference in the business of the European Raelian Movement in retaliation for its stance on pedophilia that is rampant within the Catholic Church clergy including the Catholic Church's cover up of pedophilia and the Raelian Movement's opposition to the Roman Catholic Church's genocidal position on condoms in Africa which resulted in the deaths of millions, orphaning of children and needless infection with HIV of others. These actions have harmed the claimant in England and Wales and throughout Europe and has resulted in persecution of the Raelian Movement and its members and resultingly damage to the Raelian Movement's business . Claimant seeks punitive damages Royal Courts of Justice

Value

Fag Claimant expects to recover not more than £1,000 in direct damages exclusive of punitive damages, EAYE

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Defendant's name and address

Benedict XVI 54 Parkside, Wimbledon London SW19 5NE

	£
Amount claimed	
Court fee	
Solicitor's costs	-
Total amount	

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N1 Claim form (CPR Part 7) (01.02)

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BETWEEN

EUROPEAN RAELIAN MOVEMENT,

CLAIMANT

Vs

BENEDICT XVI

DEFENDANT

AMENDED PARTICULARS OF CLAIM

- 1. The claimant, The European Raelian Movement referred to herein as "Raelian Movement," is a company in good standing, incorporated in England on May 27, 2003 and continuously doing business to present generally encompassing publishing, philosophy, scientific cosmology, advocacy of human rights and religion and is part of the worldwide Raelian Movement.
- 2. The defendant, BENEDICT XVI is a citizen of Vatican City with a residence at 54 Parkside, Wimbledon, London.
- 3. The claimant brings this claim in regards to damages in tort towit the economic tort of deliberate interference with the claimant's business or conspiracy to injure claimant by lawful or unlawful means¹, suffered by claimant within this jurisdiction.
- 4. The defendant is in the business of running a worldwide enterprise colloquially known as the Catholic Church which conducts substantial business in the England and Wales under the guise of religion including publishing, advocacy, and counseling, soliciting funds, insurance, fellowship and similar pursuits but also harbors within its embrace illegal pursuits such as sexual abuse and trafficking of minors by its priests.
- 5. The defendant previously served as an officer of the Roman Catholic Church during some of the times mentioned herein in as Prefect of the Sacred Congregation for the Doctrine of the Faith

¹ See generally: OBG Ltd and another v Allan and others; Douglas and others v Hello! Ltd and others (No 3); Mainstream Properties Ltd v Young, House of Lords, [2007] UKHL 21; [2008] AC 1, 2 May 2007 for a discussion of this modern tort.

under the name Joseph Ratzinger and was tasked with covering up the illegal activities of the Catholic Church's pedophile priests.

- 6. In 2001, the Raelian Movement established the advocacy group NOPEDO to unmask and expose the fostering and cover up of pedophilia among the clergy of the Roman Catholic Church with the active participation of claimant beginning in 2003.
- 7. On September 2002, the Raelian Movement publicly filed and Urgent Appeal with Mr. Juan Miguel Petit, the Special Rapporteur on the Sale of Children, Child Prostitution and Child, Pornography at the Office Of the High Commissioner for Human Rights, United Nations at Geneva detailing child trafficking, procurement, and sexual abuse by agents of the Roman Catholic Church that violated Convention on the Rights of the Child and the Optional Protocol on the Sale of Children, Child Prostitution and Child Pornography.
- 8. The Raelian Movement followed up its Urgent Appeal with further communications to the Special Rapporteur's office in 2003, 2004 and 2005.
- 9. As of July 2010, the Vatican City state which is the country of incorporation of the juridic entities collectively known as the Roman Catholic Church had been found 13 years overdue in meeting it obligation to report to the U.N. Committee on the Rights of the Child due to its ongoing cover up and accommodations of pedophilia within the Roman Catholic Church.
- 10. Since at least 2001, the Raelian Movement in England incorporated as claimant in 2003 has actively condemned pedophilia by the clergy of the Catholic Church and the Catholic Church's stance against condoms.
- 11. The Raelian Movement on numerous occasions in the past ten years has publicly condemned the position of the defendant on condoms including numerous public demonstrations around the world including England the defendant denies scientific fact that condoms prevent the spread of the HIV virus and particularly encourages people in developing nations to eschew condoms and in particular is partially responsible for millions of deaths by HIV infection in Africa.
- 12. The Raelian Movement since 2001 has engaged in public advocacy in England and around the world in support of its position on clerical pedophilia and condoms.
- 13. In 2001, defendant as head of the Congregation for the Doctrine of the Faith, formerly known as the "Holy Office," formerly known as the "Office of the Inquisition" issued a letter to all bishops of the Catholic Church concerning some "very grave sins" and the secret manner in which they were to be covered up henceforth known as "the Conspiracy."
- 14. In 2005, American attorney Dan Shea unmasked the defendant's cover up letter and exposed the unlawful plot to blame children for abuse by priests, obstruct law enforcement investigation by shifting priests and making documents inaccessible and to intimidate, discredit and

economically harm those who sought justice consistent with the claims made by the Raelian Movement as early as 2001 about the Conspiracy.

- 15. In 2001, the activities of NOPEDO came to the attention of the defendant who instructed his agent bishops in Belgium and Switzerland to commence a libel action against NOPEDO and the Raelian Movement which resulted in an order by the Belgian courts based upon knowingly false assertions made by defendant that his organization did not promote or cover up pedophilia and an unsuccessful attempt by the defendant's agents in Switzerland to misuse the court system in the same fashion to force the Raelian Movement to incur legal fees.
- 15. The defendant by 2002 also became aware of the Raelian Movement's stances on condoms and stem cell research and ordered his agents in Quebec and worldwide to commence a campaign of deliberate disinformation against claimant branding claimant as a dangerous cult as part of the Conspiracy to interfere, vex, harass, and damage advocates of the victims of clerical sexual abuse and in particular cause economic harm to claimant.
- 16. As a result of defendant's ongoing affirmative campaign of disinformation against the Raelian Movement and its members have suffered persecution and damage to their reputations and interference in their lives and business affairs including direct damages for attorney fees to defend against the Conspiracy initiated by the defendant in the amount of 1000 GBP since 2003.
- 17. Punitive damages are warranted due to the oppressive conduct of the defendant as part of the cover up of pedophilia within the Catholic Church and is calculated to profit the defendant by minimizing abuse claims by attacking the reputation of victim advocates and mitigating the defendant's losses at the expense of victims of pedophilia by Catholic priests.

Statement of Truth

I believe that the facts stated in these particulars of claim are true.

I state that the High Court of England and Wales has power under the Civil Jurisdiction and Judgments Act 1982 to hear this claim and that no proceedings are pending between the parties in Scotland, Northern Ireland or another Convention territory of any contracting state as defined by section 1(3) of the Act.

I am duly authorised by the claimant to sign this statement.

Full name: Clement Chigbo/Dr. Jonathan Levy

Name of claimant's solicitor's firm: Corporate Counsel for Claimant

9/14/10

Date

Clement Chigbo/Dr. Jonathan Levy, Corporate Counsel - Solicitor

Jonathan Levy Clement Chigbo Corporate Solicitors The European Raelian Movement 27 Holywell Row London EC2A 4JB jon.levy@rael.org