

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Sam Sloan,

Plaintiff,

Civil Action No. 07-CV-8537 (DC)

-against-

Hoainhan “Paul” Truong, Zsuzsanna “Susan” Polgar,
Joel Channing, William Goichberg, The United States
Chess Federation, Bill Hall, Herbert Rodney Vaughn,
Gregory Alexander, Frank Niro, Grant Perks, William
Brock, Randall Hough, Randy Bauer, Jim Berry,
Texas Tech University and United States of America,

Defendants

AFFIDAVIT IN OPPOSITION TO MOTION
TO DISMISS ON FEDERAL QUESTIONS ISSUE

Samuel H. Sloan, the plaintiff herein, being duly sworn, deposes and says:

1. I make this affidavit in opposition to the motion by various defendants to dismiss this action on the grounds of lack of a federal question.
2. Frankly, I consider the issues raised by the moving defendants to be frivolous. There are a great abundance of federal questions here. I think the defendants are just trying to buy time and to convince their clients that they are doing the best they can.
3. The United States Chess Federation (“USCF”) has 86,000 members. Every state of the 50 states have members, with the least being Wyoming with more than 50 members. The USCF represents the United States of America internationally. We are the equivalent to the United States Olympic Committee, except that instead of representing the USA in hundreds of sports, we only represent the USA in one activity, chess.
4. It is obvious that if the United States Olympic Committee or any other comparable organization such as the National Football League or the National Basketball Association had experienced the massive election fraud, identity theft, online forgery, impersonations, misappropriations of funds and so on as have characterized the USCF in the past two years, the FBI would have moved in already and started making arrests. There would be people in jail now. This has not happened because there is not that much interest in chess.
5. There have been three forensic reports produced thus far. There are the Mottershead Report, the Jones Report and the Ulevitch Report. These three reports all reach the same conclusion. The Mottershead Report has proved absolutely, conclusively that Hoainhan “Paul” Truong sent 2464 fake or forged Internet postings over a two year period from June 25, 2005 until October, 2007. That is two thousand four hundred sixty four postings, most of which impersonated me, Sam Sloan, although some

of them impersonated Ray Gordon, Andrew Zito and other real or fake personalities.

6. As to why I in particular would be the target of most of these impersonations, the best way to explain it is that I am the equivalent of the “Jack Anderson” of chess. Jack Anderson as you will recall was a newspaper columnist reporting on J. Edgar Hoover's apparent ties to the Mafia, Watergate, the John F. Kennedy assassination, the Nixon Administration, the Savings and Loan scandal, the CIA plans to assassinate Fidel Castro, the Iran-Contra affair and so on. He was a crusader against corruption. Henry Kissinger called Jack Anderson “the most dangerous man in America”. The USCF Insiders such as Bill Goichberg have the same view of me as Richard Nixon had of Jack Anderson.

7. Because I have a wide readership, anybody wanting to bring down the USCF leadership might decide to impersonate me. Paul Truong is a complete nobody in the world of chess. When he started impersonating me, nobody would have bothered to read anything written by him. Therefore, when he wanted to attack somebody he would sign my name rather than his own name to his postings. Over the period of two and a half years, Truong, whom we now know to have been “The Fake Sam Sloan” as he was called, attacked virtually every significant chess personality except for Paul Truong, Susan Polgar and Joel Channing. The fact that he never attacked Joel Channing is one of the reasons that I believe that Joel Channing was in on this from the beginning.

8. I wish to emphasize that it is 100% proven that Paul Truong did this. Not merely 99% sure, not merely “beyond reasonable doubt”, but absolutely 100% certain, no doubt at all.

9. Next, the motivation. The motivation is clear: He did it to attack the rivals of his wife, Susan Polgar, and ultimately to seize control of the financial assets of the United States Chess Federation, which has \$3.2 million in annual revenues.

10. One of the most frequent targets of attack by “The Fake Sam Sloan” is Beatriz Marinello, a woman chess grandmaster and President of the United States Chess Federation from 2003 to 2005. The Fake Sam Sloan has called her a “bulldyke” one hundred times in Internet postings over a period of two years. Paul Truong, this time not in disguise, went to the Scholastic Counsel and other scholastic groups and told them that Marinello was a lesbian. Truong also called me, Sam Sloan, on the phone in 2004 and told me that Marinello was a lesbian.

11. Most of the postings by the Fake Sam Sloan, whom we now know to be Truong, contained sexual references, usually making claims about the sexual preferences of the targets. For example, Grandmaster Alexandria Kosteniuk, a Russian girl who lives in Florida, is called “a Lolita”. Truong also conducted a campaign to kick Kosteniuk's name off the USCF Rating lists, since Kosteniuk was rated higher than Susan Polgar (who falsely claims to be a “world champion”) and to kick the picture of Kosteniuk out of Chess Life magazine to be replaced by pictures of Polgar. (In 2004-2005 most issues of *Chess Life* magazine had pictures of Kosteniuk. In 2006-2007 almost every issue of *Chess Life* had pictures of Polgar.)

12. Among the most frequent other targets of attack by The Fake Sam Sloan were US Woman's Champion Jennifer Shahade, former USCF President Don Schultz, and Chairman of the Seattle Chess Foundation Erik Anderson.

13. Please remember that most of these thousands of attacks were signed “Sam Sloan”. It thus appeared that I, the Real Sam Sloan, was attacking all of these people. Also, the 2464 “Fake Sam Sloan” postings found by the Mottershead Report to have been made by Paul Truong were crossposted to two and sometimes three usenet groups, rec.games.chess.politics, rec.games.chess.misc and alt.chess. Thus, counting the crosspostings, there were more than five thousand postings. These postings were not made on just one website located in just one state. They were made on Usenet and broadcast all over the

entire world and picked up and preserved in every country of the world. The total readership of these postings was at least in the hundreds of thousands and probably in the millions.

14. In challenging the jurisdiction of this court to consider this issue, the defendants have cited exactly one case. Best Van Lines, Inc. v. Walker, 490 F.3d 239 (2d Cir. 2007). However, that case does not lead to the conclusion they seek, for several reasons.

15. Best Van Lines, Inc. v. Walker, 490 F.3d 239 (2d Cir. 2007) involved a website in Iowa that posts reviews of moving companies. I have looked at this website and it contains statements such as “this moving company scratched my furniture”, “that moving company lost my suitcase” and so on. I have yet to find a favorable review of any moving company on that website.

16. Best Van Lines is a moving company located in New York that was subjected to allegedly defamatory remarks by the Walker website in Iowa. As a result, suit was filed in the Southern District of New York.

17. The District Court ruled and the Second Circuit affirmed that Best Van Lines must sue in Iowa, where the Walker website is located. By analogy, this is similar to a case of a small-town in newspaper in Iowa that has a few readers in New York.

18. However, the case presented here is different for a number of reasons. One is that the defamatory postings were not made on a simple website. They were broadcast and propagated all around the world in every country of the world. In the Best Van Lines case, if the computer hosting the Walker website were to crash, nobody in the entire world would be able to see it any more. However, in the case presented here, if one computer or even one hundred computers crash, the Truong postings will still be visible in many other places. Indeed, when Truong was apprehended, he stayed up all night in Mexico City where he was at the time trying to delete as many of these postings as he possibly could. He was able to delete many of them from Google Newsgroups, because that is where he had first posted them, but he still has not been able to delete them from Forte Inc. Agent, from Giganews.com or from the many other services that carry these newsgroups.

19. William Brock in his motion to dismiss states that his postings which in general stated that I am a child molester were all posted from his CPA Office in the Chicago Loop. However, the location of his personal computer is of little moment. What is important is where he posted them. Not only did he post them on the Usenet groups around the world, but he posted them on such places as the New York Times website which is obviously located in New York State.

20. An example of Brock's postings on the New York Times website is at:

<http://gambit.blogs.nytimes.com/2007/10/08/the-lawsuit-against-polgar-and-truong-et-al-a-forum/>

21. There, you will see numerous postings by William Brock on the New York Times website where he provides links to places where, he claims, one can find proof that I am a child molester and a child pornographer. Mr. Brock is obviously a sick, disturbed man. Clearly, Mr. Brock cannot now claim that the New York courts have no jurisdiction over this.

22. Best Van Lines, Inc. v. Walker, 490 F.3d 239, 250-51 (2d Cir. 2007) involved a moving company in New York complaining about a website in Iowa. However, in the case before this court, defendants have made a point of posting on forums read by the widest possible readership which are broadcast Worldwide. Even after the filing and service of this lawsuit, Defendant William Brock has made defamatory postings to the New York Times website which is, of course, located in New York. The New York Times has published ten articles about this case, three in the paper print version of the

newspaper and the other seven on the online or "Gambit Blog" of the Newspaper. William Brock has continued posting his defamatory material accusing me of being a pornographer to these New York Times Gambit Blogs even while this case has been pending before this court. The first of these articles in the New York Times was "Chess Group Officials Accused of Using Internet to Hurt Rivals" by DYLAN LOEB McClain Published: October 8, 2007 Kindly take a look at it.

23. Similarly, William Brock has posted these claims that I am a child molester to the "Daily Dirt" column of the chessninja.com website which is based in New York and operated by Mig Greengard in Greenwich Village, New York City and he has posted to the Susan Polgar Blogspot at susanpolgar.blogspot.com during which time and until approximately May, 2007 Susan Polgar resided in Rego Park, Queens, New York. Mr. Brock has posted 97 times to my biography on the Wikipedia Encyclopedia. Most importantly, William Brock has posted thousands of times since 2004 to the Internet Usenet groups rec.games.chess.politics and rec.games.chess.misc . These Usenet postings are not maintained at any one location. They are propagated and broadcast all over the world. If one computer crashes there will be plenty of others to back it up. That is the reason why the Internet is called "the World Wide Web". Although Google Newsgroups is the most popular place to post to and view these newsgroups, there are many others including Forte Agent and Giganews.

24. There is a big difference between the Bill Brock postings and the Paul Truong postings. Bill Brock signs his own name. He openly states that he is the poster and has many times challenged and dared me to sue him.

25. Paul Truong, however, signs MY NAME to his postings. He says that he is me. This is a much more serious case of Internet Identity Theft, Forgery and Impersonation.

26. Paul Truong does post under his own name on the USCF Issues Forum on the uschess.org website, because Fake-Name postings are not allowed there (This rule was enacted to stop Herbert Rodney Vaughn who posts as tanstaafl from posting his anonymous attacks on me.) Here is a posting by Truong on Tue Jul 25, 2006 11:32 am #16962

Well, as a life member of the USCF and someone who devote a lot of time, energy and money to promote scholastic chess, and someone with children playing chess, the background of a board member is vital to me, especially when someone has a horrific sexual history with minors.

You are entitled to your opinion and I am entitled to mine. Sam Sloan is a danger to my children, the young members of the USCF and a serious legal liability to the USCF. Frankly, it appalls me the there are people who are willing to close their eyes and accept this monster.

27. As we now know, the real danger to Truong's children is Paul Truong himself because two judges of the Queens Family Court, Judge Rhea Friedman and Referee Mildred T. Negron, have issued orders of protection prohibiting Paul Truong and Susan Polgar from inflicting corporal punishment on their children for refusing to play chess. I have never received any such order of this nature from any judge.

28. Not only has Bill Brock stated that I am a child molester thousand of times on the public newsgroups, but he was also allowed to post that on the USCF website:

by billbrock on Fri Jul 21, 2006 11:19 am #16303

For the record: Sam Sloan is a convicted felon. His two felony convictions directly impacted the safety and well-being of his children, but were not sexual in nature AFAIK.

For the record: I maintain that Sloan is a child molester by his self-admitted conduct. He has never been convicted of such.

29. On this last point, I ask this court to search Lexus-Nexus and find the 6-3 decision by the Virginia Court of Appeals which affirmed my conviction. Please read carefully the opinion by the three dissenting judges. That dissenting opinion makes it clear that I was not remotely guilty of anything and could not possibly have been convicted in a properly conducted trial with a proper defense.

30. All this pertains to just one count of the complaint, namely the thousands of Internet postings by Truong and Brock impersonating me or calling me a "child molester" and other names.

31. There are four other counts to the complaint, numerous sub-counts and numerous causes of action.

32. One of these concerns the criminal theft by Truong and Polgar on August 20, 2003 of the USCF laptop computer which would have contained information about the missing two million dollars of USCF funds.

33. In 1999 the USCF had approximately two million dollars on deposit with the Oberweis Fund, a mutual fund listed on the New York Stock Exchange.

24. By 2003 that two million dollars had been reduced to five dollars. Since there was no point in having an account with only five dollars in it, the Oberweis account was closed. When the account was closed, Frank Niro, who was the Executive Director at the time, changed the accounting system to hide the horrific losses. The real question is: Who lost the money and what happened to it? The two Executive Directors during the relevant period were George DeFeis and Frank Niro. Both probably padded their resumes to get hired. DeFeis probably did not really have a Masters Degree in Business administration from Bernard Baruch School of Finance. Frank Niro claimed that he had received an award of "Hospital Administrator of the Year" but we have not been able to find out what hospital and what organization gave this award. (On this point, Bill Hall is a vast improvement on his predecessors. Unlike DeFeis and Niro who probably padded their resumes, Bill Hall honestly admits that he has no qualifications whatever for the job of Executive Director.) In either case, nearly two million dollars is missing and the laptop is missing too that would tell us what happened to the money. Polgar and Truong have admitted to taking the laptop, which was obviously criminal theft, and they have refused to return it. Bill Goichberg has made no effort to recover the laptop. Frank Niro is named as a defendant to this lawsuit but his own attorney, Proskauer Rose, has been unable to locate him. Truong and Polgar know where Frank Niro is. They have even visited him in Washington State fairly recently and posed for pictures with him there which are on the www.susanpolgar.com website, but refuse to reveal where he can be contacted. Frank Niro has also posted about this case on Paul Truong's www.chessdiscussion.com website so he certainly knows about it.

25. I personally believe that George DeFeis lost most of the money but that Frank Niro ripped off a fair piece of change for himself and is hiding, waiting for the statute of limitations to expire.

26. Meanwhile, Jeff Loomis, who was the Chief Financial Officer under DeFeis has suddenly reappeared TODAY !!! and has just posted on Susan Polgar's Chess Discussion group. Perhaps we can bring him in since the rest of them have absconded.

27. In short, there are more than enough grounds for federal jurisdiction here. Also, if not here, then where? If this sort of case does not raise a federal question, it then becomes possible for someone in Timbuktu, Mali, or in Russia, China or Nigeria to blanket the Internet with fraudulent postings. We already have millions of "Nigerian Scam" letters being received in people's email boxes every day.

Undoubtedly, there are people who fall for these scams because the emails keep coming. Would this court rule that a victim would have to go to Nigeria to sue them? We also have a United States Presidential Election coming up and already there have been reports and complaints of similar Internet scams involving the presidential candidates. Those cases are much smaller than the instant case in that here we have 2,464 fake Usenet postings impersonating me and others, whereas most comparable cases involve just one or two emails.

28. A comparable and relevant case is Global Ministries vs. Cablevision Lightpath, CV 06-3669 (DRH) decided in the Eastern District of New York on November 30, 2006. This case involves an issue in this case, because that case turned on the right to obtain IP addresses. The Mottershead Report which found that Paul Truong had made the 2,464 Usenet postings under the name of Sam Sloan tracked the IP addresses of the various computers used by Truong and matched them with the computers used by the "Fake Sam Sloan". This showed a remarkable coincidence in that where ever Paul Truong was the Fake Sam Sloan was there too. When Paul Truong posted from Rego Park, Queens, the Fake Sam Sloan posted from Rego Park Queens too. When Paul Truong moved to Lubbock, Texas to work for Texas Tech University the Fake Sam Sloan moved there. When Paul Truong and Susan Polgar went to Mexico City in September 2007 to visit the World Chess Championship, the Fake Sam Sloan posted from there too. Not only that, but they used the same computers, the same IP address and the same User Agent String.

29. With this happened consistently over and over again it became obvious that the Fake Sam Sloan and Paul Truong were one and the same.

30. This is why Paul Truong's primary defense as reported by the New York Times is that the evidence against him was "illegally" obtained.

31. However, in Global Ministries vs. Cablevision Lightpath, CV 06-3669 (DRH) decided November 30, 2006, the court ruled:

III. Ms. Brown's Constitutional Rights

The court must consider whether granting the petition will violate Ms. Brown's constitutional rights. The unknown defendant is alleged to have used Cablevision's services to access the stored electronic communications of petitioner, without authorization. In addition, the unknown defendant logged into the e-mail account of an employee of petitioner and used that person's e-mail to send fictitious messages of termination to other employees. Such a person has a "minimal expectation of privacy," if any, in using an Internet service provider to engage in such tortious conduct. See *Sony Music Entertainment, Inc. V. Does 1-40*, 326 F.Supp. 2d 556 (S.A.N.Y.2004) ("defendants have little expectation of privacy in downloading and distributing copyrighted songs without permission.")

32. In the case presented here, we already know Mr. Truong's IP addresses. Brian Mottershead found them in the course of his duties as Administrator of the uschess.org website. Here is where Paul Truong made his big mistake. As "the Fake Sam Sloan", he personally attacked Brian Mottershead, thereby giving Mr. Mottershead the incentive to research and find out who was writing these nasty things about him.

33. On a related subject, Gregory Alexander, who is also a defendant here, has been contacting the authors of the three reports that prove that Paul Truong did it and has been making threatening and intimidating remarks. Gregory Alexander has repeatedly contended that Brian Mottershead committed a crime by revealing the IP address of Paul Truong. I suspect that Gregory Alexander may have

committed some offenses related to threatening or intimidating a federal witness.

34. Robert Jones, author of the “Jones Report”, wrote the following:

“Just wanted to let you know that I had an odd phone call from someone purporting to be from the USCF but I'm not sure if that is really the case. I answered the phone and this guy said he was Gregory Alexander from the USCF and immediately launched into a series of questions about my expertise in internet forensics, had I ever given evidence in court, etc. I was a bit taken aback but figured he was a USCF staffer or lawyer or something. I was happy to give him that information but then he asked me if I was aware that Brian Mottershead had hacked into his account, and was I aware the Paul Truong had criticized him two weeks before he prepared his report and would that knowledge change my conclusions on the data analysis.

I explained to him exactly what I say in the report that I performed a technical analysis of the data associated with the Mottershead report and that I stand by the conclusions in my report. I said that I don't know Truong, Mottershead or any of the other players in this dispute. He then went on to say that Truong is a friend of his and that he has evidence that Truong is not involved in any of this - something about a friend of his has seen plane tickets (?) - and that making a defense against the claims out there against Truong is very difficult. I reiterated that my analysis was a straight technical analysis, done in response to your request, as an independent review of Mottershead's report.

35. Gregory Alexander is not “from the USCF”. He is a close associate of Polgar and Truong. He is also the webmaster of their website. The “plane tickets” defense we already know about. It is one of the standard defenses Truong uses. Another is the “somebody is following me” defense. The “plane tickets” defense was used in the “Voice of Reason” case where Mig Greendard who had previously been one of their strongest supporters realized that his Daily Dirt website was being bombarded with postings by all sorts of different people all saying the same thing and all posting from the same IP address. This is one of Paul Truong's *modus operandi*. Truong creates dozens of fake personalities and posts under their names. When Mig Greengard realized that all these different identities were the same person, Truong and Polgar claimed that it could not have been them since they were traveling at the time and were on an airplane in mid-flight. This is probably the sort of “rock solid” evidence they claim to have recently provided to the board proving that it was not them. An Internet gadfly has posted what he calls “The List of the Blind Monkey” listing so far 41 ridiculous defenses presented by Truong allies which supposedly prove that they could not possibly be responsible for the 2,464 postings by the Fake Sam Sloan. The “somebody is following me” defense we know about too. It was also used by Paul Truong when in 2003 it was proven through IP addresses that he was the same person as “Bob Bennett”.

36. In the last month or so, new fake posters have appeared. Their postings are “remailed automatically by anonymizing remailer software”. They sometimes sign as “Sam Sloan” but usually do not give a name at all. Top suspects are Gregory Alexander and Paul Truong but it could be anybody. These anonymous fakes are posting every day lately, so please take a look.

37. Another issue in this case concerns the sale of the USCF building in New Windsor. In November, 2004, the USCF owned a fully paid for office building in New Windsor, New York. Bill Goichberg took it upon himself to sell it. He never consulted the board. There was no debate nor vote on this issue. At least two board members, Frank Brady and Don Schultz, were adamantly opposed to this sale and would have voted against had it come up for a vote. Unfortunately, Bill Goichberg who was Executive Director at the time, seems to treat the USCF as if he owns it and makes decisions without consulting the delegates or the board. The complete USCF minutes for every meeting for that period are available

online. One can check the minutes and see that nowhere in the minutes does it show that the board ever debated, voted on and passed a resolution to sell the building. In short, the sale of the building was illegal, without corporate authority.

38. It is important to note that New Windsor is in Orange County which is in the Southern District of New York. Since most of the bad acts that are the subject of this lawsuit took place in New Windsor, this establishes the jurisdiction and venue of this court.

39. Finally, the USCF election itself was rife with fraud. Three times during the election campaign period I was suspended from posting for ten days each. Goichberg and Co. appointed the most hostile moderators they could find to moderate my postings and the postings of anybody who supported me including as moderators Gregory Alexander, Herbert Rodney Vaughn and Louis Blair. Not only was I suspended from posting but anybody who supported me was suspended from posting as well. Anybody who asked an embarrassing question of Polgar and Truong had their postings pulled and was suspended from posting. Questions asking Polgar and Truong whether they were married to each other or not were not allowed. Questions were not allowed asking about the eleven national chess championships Truong falsely claims to have won or about the fake PhD degree Truong claimed to have had or about the billion dollar corporations Truong claims to have rescued and saved. More than one thousand postings were pulled by the pro-Truong and pro-Polgar moderators. Dozens of individual USCF members were suspended from posting. I protested vehemently at the appointments by Goichberg of these anti-Sloan and pro-Polgarite moderators. Goichberg supported Polgar and Truong for election until just before the ballots were mailed out. Sometimes, Goichberg would appoint a moderator who failed to understand that his mandate was to stop me and my supporters from posting. Although vehemently hostile to me at the time they were appointed, a few of the moderators suddenly saw the light and reversed course. Examples of this are Ron Suarez and Steve Owens (“Steve of Tennessee”). When Goichberg and Channing realized that these moderators were not carrying out their mandate to muzzle me, they would contact these moderators, telling them to crack down on me and my supporters. At least two moderators resigned, protesting interference by the board, and one of the moderators committed suicide.

40. At a hearing, I will demonstrate and prove that Bill Goichberg and Joel Channing knew all along that Paul Truong was the “Fake Sam Sloan”. They took no steps to stop him from doing this because it served their purposes to have someone impersonating me. Because of these and numerous other irregularities, I will be asking this court to declare the election null and void and to schedule a new election. I will also request that this court enjoin Polgar, Truong, Goichberg and Channing from running for office again or from ever holding office in the United States Chess Federation again, due to their numerous bad acts committed by these four defendants.

41. I am attaching as exhibits the three forensic reports that prove that Paul Truong did it. These are The Mottershead Report, the Jones Report and the Ulevitch Report. These reports are supported by more than one thousand pages of data that are available online.

42. In addition, I am attaching two orders of protection of the Queens Family Court prohibiting Susan Polgar and Paul Truong from abusing their children (by forcing them to play chess) plus several newspaper articles about this case. These have been three articles in the print edition of the New York Times about this case, plus seven additional articles in the online version of the New York Times, plus articles in the Boston Globe for December 24, 2007, the New York Post, the Lubbock Texas Avalanche Journal, the Daily Toreador campus newspaper of Texas Tech University, plus articles in “The Independent” newspaper in England. There are at least twenty online blogs and websites devoted to this case and there have been at least one thousand Internet postings about this case. (If this court or any of the attorneys have received any “nutty” or “screwball” letters about this case, I hope that the court recognizes that I have nothing to do with them. There are some seriously disturbed people out there who also happen to play chess.)

43. Also, be prepared to hear the “I am a victim” defense. If you look at Susan Polgar's blogs and websites you would believe that there is this massive conspiracy against her involving now the majority of the Executive Board of the United States Chess Federation (who finally stripped her of her fake titles on Saturday, February 2, 2008 (two days ago)). She has recently accused the USCF Executive Majority of “threatening” her children. According to her, the USCF Board now joins a vast conspiracy. Co-conspirators include the World Chess Federation (“FIDE”), newspaper reporters in the New York Times and other publications, the Hungarian Chess Federation and others. This probably explains why Polgar and Truong switched attorneys two weeks ago. She has been playing the “Everybody is Against me Because I am a Poor Jewish Girl” role for the past 25 years. If you look at her performance on the BBC Broadcast “My Brilliant Brain – Make Me a Genius”, now available on YouTube, you would never imagine that she never went to school and never learned the basic skills of reading, writing and arithmetic. Her two children complain that she cannot help with them with their homework in the second grade because she never learned that stuff. The only thing she can do is play chess (very well). She communicates with the outside world by emails and Internet postings that are undoubtedly written by Paul Truong and others, that she will no doubt disavow when the time comes. She already claims that she did not write her book “Queen of the King's Game” which attacks numerous of her past sponsors and benefactors.

WHEREFORE, the motions to dismiss this case must be denied.

Samuel H. Sloan
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samsloan@samsloan.com

STATE OF NEW YORK)
 ss:
COUNTY OF BRONX)

VERIFICATION

Signature of Petitioner

On the 4th Day of February, 2008 before me personally came Samuel H. Sloan to me known to be the person described herein and who executed the foregoing instrument. Such person duly swore to such instrument before me and duly acknowledged that he executed the same.

NOTARY PUBLIC

Affidavit of Service

Samuel H. Sloan, being duly sworn, deposes and says that on February 4, 2008 he mailed the within affidavit in opposition to motion to dismiss this action for lack of diversity to the following addresses:

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Samuel H. Sloan

Sworn to before me this 4th
Day of February, 2008

NOTARY PUBLIC