

**UNITED STATES DISTRICT
COURT DISTRICT OF NEW
JERSEY**

U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
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LEE KENWORTHY, individually; SAMANTHA BROWN,
individually; SIABELLA KENWORTHY, individually;
MIKAILAN KENWORTHY, individually; The ESTATE
OF SHAYLING KENWORTHY.

COMPLAINT:

Plaintiff,

JURY TRIAL - YES

-against-

HEATHER CHRISTENSEN LCSW, CALI ESPOSITO,
CHERYL ROSE, ROBERT BATY, CLARA
BALCACER-COLON, DAVIAN BREEDLOVE

Defendants.

Plaintiff:	Name	<u>Lee Kenworthy</u>
	Street Address	<u>127 WALTON STREET</u>
	County, City	<u>BERGEN, ENGLEWOOD</u>
	State & Zip Code	<u>NEW JERSEY 07631</u>
	Telephone Number	<u>347-549-0020</u>

Statements of Facts/Violations

Retaliation via for surrounding with intent to defame discredit and orchestrate fraud charges false detainments medical or legal in a fraudulent manner against Lee Kenworthy in an effort to present a false narrative image to the public with deliberate intent for and surrounding pursuit of justice for Shayling Kenworthy estate as clearly stated multiple times by multiple parties

Heather Christensen immediately upon hearing Lee Merritt Esq. was going to be retained turned up the attack in a deliberate aimed manner to defraud rob discredit harm detain and fully destroy as will be illustrated beyond any reasonable doubt via recorded evidence and first hand testimony.. Recordings on Heather Christensen span 2 years including multiple sessions of smoking marijuana discussions of no mental disorders instabilities needing medication had then Heather threatening that she has called the police state to inform them I'm off the medication I'm being forced to take she absolutely does not agree professionally or personally as clearly recorded.... Ethics not Heather Christensen's strong point as she is also recorded acknowledging she received 20k worth of home remodeling work from me and robbed me in that situation as well ... glorifying her theft of my services she took advantage of... All evidence including pictures of work and heather threatening Samantha and myself with homelessness multiple times in 2 years raising real questions as to what has been her intent all along with obvious outcome results and lies on court records Heather Christensen felt so bold with continuing knowing she is recorded in crimes and ethical behavior befitting of a sociopath given her line of work and duty to Health mental care rather than financial benefits for illicit illegal heinous criminal behavior...

Housing discrimination orchestration of hateful deceitful false illegal charges and detainment 4th amendment civil rights violations in lieu with RICO violations targeted misinformation defamation of character via Facebook, Google fake misinformation reporting platforms delivering false information knowingly along with tried failed attacks orchestrated to rob defraud then falsely incarcerate and evict via With lies false police reports all parties are caught red Handed recorded commuting and then continued to by supplying false information about their attacks upon Lee Kenworthy family and estate of Shayling Kenworthy via electronic devices RICO violations to defame cyber stalk harassment and discredit with full knowledge and intent to harm hinder and inhibit infringe upon my families civil rights liberties and well being both current and future ...

Federal housing discrimination deliberately orchestrating with intent to defraud defame false incarcerations & unlawfully detain and hinder our civil rights across many multiple constitutional rights codes from 1st, 4th, 5th, 8th, 9th, 13th, 14th all of which will be fully illustrated detailed and recorded evidence provided along with transcripts for public view given full nature of suite and defamation orchestrated attack with retaliatory intent to present an image that is entirely contrary based upon no fact and illegal having had has multiple risk factors to my families ongoing stability well being and safety raising to federal jurisdictions ...

Multiple parties did engage in the illegal transferring communication via cell phone electronic devices to and from a slanderous Aired attack misinformation platform giving way to for cyber crimes threats harassment and stalking and did with full intent and knowledge deliver false defamatory dangerous misinformation lies to be spread to the general mass public with an intent to defraud defame harm inhibit and alter my image public character and support for justice for Shayling Kenworthy and with malice intent to alter future opportunities as it has and currently is with a state license in child psychology it is appalling for you and Cheryl rose Fedex executive to use housing discrimination and stability as your battlefield and weapon against my family it's dehumanizing and deplorable..

With absolute deliberate intent heather Christensen licensed state therapist for children having previously been employed by Bergen regional new bridge as stated by her when told the evidence being collected and amassed against them was being delivered to Lee. Merritt esq did move invite orchestrate the living situation and environment discrimination to keep tabs and cause deliberate harm if and when necessary with intent to deliberately defraud defame slander and false incarceration hospitalize as caught fully recorded in December 2018 with deliberate threats included lying to police officers with intent to harm defame Lee Kenworthy and estate of Shayling Kenworthy...

Heather Christensen with a psychological background did with intent to harm constantly all recorded transcripts will be submitted for public records and full evidence exposure did psychologically attack and abuse Lee Kenworthy the estate of Shayling Kenworthy our children and Samantha brown with deliberate intent to harm defraud defame discredit and rob making homeless using her career reputation and image as weapon against our family including false reporting while knowingly supplying Robert Baty dangerous false information to cyber harass stalk and threaten intimidate and defamation of my entire family unethical and so illegal I'm sure resulting inevitably to her licenses forfeiture ...

Heather Christensen and Cali Esposito did supply misinformation slanderous knowingly with intent to defame cause harm discredit and cause illegal unethical discrimination and detainment to and with intent and knowledge they supplied knowing we would be harassed intimidated threatened cyber stalked bullied and ultimately it would cause both mental stress trauma and anguish as defamation to hinder attack the estate of Shayling Kenworthy and our children and justice with deliberate retaliation retaliatory tactics did utilize every weapon at their disposal false reporting police courts cyber harassment and flat out lies with intent ...

Heather Christensen having tried to orchestrate a situation I Lee Kenworthy saw and fully avoided within best of my ability and finances by making sure the rent checks were coming from my name and company account to make sure exactly what heather tried she was not could not legally accomplish Ie saying I was not paying rent and trying which heather did to say I in fact stole everyone's rent money while filing false charges restraining orders to support this lie false police report while

also telling to the public with absolutely full deliberate intent to defame discredit and harm ...

Heather Christensen and all tenants in fact left without paying rent totaling 5k stolen from Lee Kenworthy and Samantha brown ...

Cheryl Rose being the landlord informed multiple times since November December of the ongoing attacks upon the property our character safety all at her home her residence which was being utilized as a weapon to discriminate and attack our characters and stability had a responsibility to step in and stop her friend and lease holder heather Christensen from attacking us the people who were in fact paying the rent for months which she knew ... Cheryl Rose was asked for months all recorded to step in and stop the blather discrimination and threats upon our safety unless she was a willing participant destabilizing our current and future wellbeing and safety

Cheryl Rose executive at FedEx as flaunted she makes 250k did with deliberate intent utilize her property as a weapon to discriminate defraud defame attack and destabilize degrade and discriminate against Lee Kenworthy family and estate of Shayling Kenworthy including leaving us without a running working bathroom shower since March 13th 2019 still currently not fixed or working because of her continued retaliation discrimination and disregard for human decency and delivery of livable human conditions...

Cheryl Rose and Heather Christensen both professionals having heard knowing full well and heather definitely possibly even Cheryl having supplied personal misinformation and outright lies to Robert Baty to defame discredit attack and cause deliberate mental harm anguish and grief did and are currently engaging in the deliberate act of defamation of character slander are liable for mental emotional damages they are willfully participating in against the estate of Shayling Kenworthy and the entire Kenworthy family ... once again they have made this a Rico violations case orchestrating with deliberate intent to defraud & discriminate allowing and inviting racist hate cyber attacks from Robert Baty and Davian Breedlove along with Clara Balacer-Colon ...

Clara Balcacer-Colon being a state licensed advocate and personal friends of officers Reina and Martins parties to Shayling Kenworthy's murder and wrongful death suite did along with Cali Esposito Heather Christensen Cheryl rose Robert Baty and Davian Breedlove did orchestrate events and platforms to fully misinform and defame with full intent to harm the estate of Shayling Kenworthy and the entire Kenworthy family...

I Lee Kenworthy and Samantha Brown have spoken to and requested multiple countless times Cheryl rose and Heather Christensen end this deliberate defamation slanderous attack while they simultaneously leave us without proper living conditions robbing rent trying to orchestrate dangerous false situations that could result in my bodily harm with racist cyber stalkers they are shown working with Cali Esposito Clara Balcacer-Colon Heather Christensen, Robert Baty, Davian

Breedlove and Cheryl Rose to all orchestrate false erounous defamation of character cyber stalking threatening hate speech with full intent to harm ...

All recordings show and illustrate a hate discontent and treatment in a discriminatory derogatory deceitful manner to destabilize harm and ultimately defraud and displace us as Cheryl Rose clearly with disregard to any no working shower asked demanded to move Heather Christensen back into the residence after she Heather Christensen had attacked us since September including false charges restraining orders cyber bullying harassment and stalking along wuth robbing destabilizing and discrimination against us

Given the delicate nature and stability truly being sought thru this action Ie the immediate end to the housing discrimination and disparities this is causing with regards to mental emotional and financial stability to have a functioning household and environment stable lease without threats from Cheryl Rose Heather Christensen or any local police allowing crimes by these parties to continue as they help cyber harass and stalk with hate groups they r helping to destabilize our home with ... full intent to harm ...

Once all evidence is fully transcribed submitted and delivered with service to all named parties and fully illustrated to the court plaintiffs may seek summary judgement for swift resolution from for all parties as evidence is absolutely not in defendants favor at all while we are still without a functioning bathroom and we will fully illustrate malice deliberate intent to lie defame defraud discriminate threaten and falsely incarcerate along with destabilize rob and evict us illegally after fully attacking and dehumanizing us ...

To attack a family who has lost their loved one to police murder with a state therapist license Heather Christensen and Cheryl Rose an executive at a Fortune 500 company FedEx making 250k I'm sure all colleagues would and will be fully ashamed once all transcripts are ready for full public view and not taking a call Cheryl for 50 days while your paying tenants-have no shower no bathroom sink having paid you rent every single month since October from my account 2250. Thru until May not getting a call until May Cheryl Rose is absolutely housing discrimination with intent to destabilize harm and defraud...

I ask you please swiftly promptly now filed and federal demands of civility are going to be in play and out into measure treat me humanly and stop discrimination and destabilizing attacking us and fix the home so my family may live without your ongoing hostility and unwillingness to address legal matters of housing discrimination and deliver a functioning environment Product without retaliation from your previous tenant and friend coconspirator.