

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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|--------------------------|---|--------------------------------------|
| MARILYN PATRIOT |) | CIVIL CASE NO: 07 1837 |
| PLAINTIFF |) | PLAINTIFF INITIAL DISCLOSURES |
| |) | |
| VS |) | |
| UNITED STATES OF AMERICA |) | |
| |) | |
| DEFENDANT |) | |

Pursuant to LCvR 5.2 of the Rules of the U.S. District Court for the District of Columbia, Filing of Discovery Requests and Responses, Plaintiff hereby files the Initial Disclosures which incorporates by reference Plaintiff's Interrogatories under Rule 26.

- (1) This complaint was being filed under FRCP 4.
- (2) The complaint is an action brought under 26 USC §7433 for damages of \$100,000 plus fees and cost for an illegal Internal Revenue Service levy on plaintiff's pension, return of monies illegally taken plus interest.
- (3) Plaintiff requested trial by jury, pursuant to FRCP 38.
- (4) Summary of Damages:
Plaintiff supposedly owes the IRS about \$10,000.
According to Plaintiff, the IRS confiscated about \$60,000.
According to the IRS, they confiscated about \$50,000.
The IRS already paid back about \$11,000.

Plaintiff seeks about \$39,000 or \$49,000 (depending on whose record is more accurate)
PLUS interest, actual damages of \$100,000, attorney's fees and costs, etc.

- (5) Plaintiff alleges that the Defendant, Internal Revenue Service, under the color of law violated the following laws:
 - a. Tort - Intentional Infliction of Emotional Distress: Plaintiff and her husband were denied the necessities of life due to the levies on their three pensions. Due to the excessive levy and the recalcitrance of the IRS, Plaintiff suffered mental anguish, anxiety, and emotional distress.
 - b. Demand for civil damages for unauthorized collection, according to 26 USC §7433
 - c. Violation of 42 U.S.C. § 1983 - deprivation of civil rights.

d. Violation of 42 U.S.C. §1985 - Conspiracy to interfere with civil rights:
Obstructing justice; intimidating party, witness, or juror.

(6) The names of the individuals likely to have discoverable information include the Plaintiff whose addresses and phone number are listed in the Petition and her husband of same address.

(7) Persons who may be used at trial are the Plaintiff or any of the defendants' employees who may have detailed knowledge regarding this case. No expert witnesses are anticipated.

(8) Please refer to Attachment C for a list of all documents, data compilations, and tangible things in our possession, custody, or control that we intend to use to support our claims.

(9) Please refer to Attachment C for a list of all documents, data compilations, and tangible things in our possession, custody, or control that we intend to use to show damages.

Certificate of Service: I do hereby certify that on this date I sent properly a copy of this pleading to opposing counsel.

Attorney Elias ,Esq.

Date: November 11, 2007