

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Civil Action No. 09 CV 00309 MSK-KMT

SUZANNE SHELL

Plaintiff

v.

AMERICAN FAMILY RIGHTS ASSOCIATION, et al.

Defendants.

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MOTION TO SUPPLEMENT DEE CONTRERAS' MOTION TO DISMISS (# 58) BASED  
ON NEW EVIDENCE, AND SUPPLEMENT THERETO

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COMES NOW the Defendant, Dee Contreras, and requests that this Court allow her to supplement her Motion to Dismiss based on new evidence recently submitted by Ms. Shell as follows:

1. It appears Ms. Shell is basing her contention that Ms. Contreras was a willing participant to an alleged conspiracy by SOME of the Defendants named in this lawsuit, upon what Ms. Shell appears to believe is absolute evidence that ALL parties have been properly named as defendants and co-conspirators. Ms. Contreras wishes to point out further evidence of her innocence by including this information and including this new evidence supporting her Motion to Dismiss.
2. Dee Contreras was not a member of the bashingshell group, from which Exhibit 2 Blackball (attached hereto, filed by Ms. Shell as Document 196 Attachment 6 entitled Exhibit 2 Blackball) was derived. Although I was invited to joint Bashingshell, I chose not to join. While the group may have been public, only SOME of the Defendants were a party to it. Only SOME of the Defendants had a meeting of the mind. NONE of that included Dee Contreras.
3. Just because someone sent e-mails to me does not mean I responded to them. While the INTENT TO CONSPIRE may or may not be proven by the making of a distribution list to all groups and mailing list, that proves only that ONE PERSON had the intent to conspire, and not that two or more people conspired. It also does NOT mean I "willingly agreed" to any conspiracy. There is absolutely no evidence at all that I ever responded, and there never will be, because I did not respond in any manner.

4. I was never a member of JFF-USA. I was never a reader of the message to JFF-USA which Ms. Shell alleges to be absolute "proof" that readers understood such message to be a conspiracy and, therefore, such message is not proof that THIS defendant understood the message to be a conspiracy.

5. While I did READ the message sent by Dennis Hinger to AFRA\_EAGLE (which did not include the information found on Bashingshell nor on JFF-USA), asking that everyone blackball Ms. Shell and her cohorts, and requesting that everyone work to have Family Rights Advocacy Improvement Project shut down, I did not respond to that message, nor did I willingly take part in anything any of the persons or entities who received such mailing may have suggested. Ms. Shell herself READ these things, even though I have not previously seen them. Does that mean she is a party to the conspiracy? Of course not. That is as ludicrous as Ms. Shell's suggestion that Ms. Contreras did so.

6. I have not, at any time, requested that Familyrightsadvocacyimprovementproject be shut down. Despite the fact that it was REQUESTED in the e-mail from Mr. Hinger that Suzanne Shell and her cohorts be blackballed, I did not do so. I continued to have a relationship with both Christine Korn and Rosemary Van Gorder, knowing full well Christine's dedication to Ms. Shell. This should indicate that I DID NOT become a party to the request, and therefore, did not "willingly become a party" to any conspiracy.

Furthermore, as evidenced by the Colorado Confidential website postings in DECEMBER OF 2006, which was also submitted to this court by Ms. Shell, after all of these things took place I was still supporting Ms. Shell's work in Colorado, while denouncing badadvocates.com and "the Editors".

WHEREFORE, Ms. Contreras wishes to supplement her previous Motion to Dismiss with this new information, of which Ms. Contreras was completely unaware until this time.

RESPECTFULLY SUBMITTED

B. Dee Contreras 6/29/09  
B. Dee Contreras

Defendant:  
10571 Colorado Blvd., Apt. B-101  
Thornton, CO 80233

Certificate of Service

I hereby certify that on the 29th day of June, 2009, I served a true and correct copy of this **MOTION TO SUPPLEMENT DEE CONTRERAS' MOTION TO DISMISS (# 58) BASED ON NEW EVIDENCE, AND SUPPLEMENT THERE TO** as follows:

AFRA - via e-mail to William O. Tower	William O. Tower - via e-mail
Leonard Henderson - via e-mail	Susan Adams Jackson - via e-mail
Cletus Kiefer - PO Box 52, St. Charles, MO 63301	Families at Risk Defense Alliance - c/o Curtis Kiefer
Francine Renee Cygan - 329 Cornell Ave., Apt. D, Villa Park, IL 60181	Mark Cygan - 329 Cornell Ave., Apt. D, Villa Park, IL 60181
Illinois Family Advocacy Coalition - c/o Renee Cygan	Dorothy Kernaghan-Baez - via e-mail
Georgia Family Rights, Inc. - via e-mail	Dennis Hinger - via e-mail
National Association of Family Advocates via e-mail	Aimee Dutkiewicz - via e-mail
Thomas Dutkiewicz - via e-mail	Connecticut DCF Watch - c/o Thomas Dutkiewicz
William Wiseman - via e-mail	Wiseman Studios - via e-mail
Ann Durand - via e-mail	Brenda Swallow - via e-mail
Kathy Tilley - 800 Gibson Dr., # 322, Roseville, CA 95676	Randall Blair - via e-mail
Lloyd Phillips - 14220 SW 29 Court, Ft. Lauderdale, FL 33330	Ringo Kamens - via e-mail
Cheryl Barnes - c/o Daniel Slater	CPS Watch, Inc. c/o Daniel Slater
Desere' Clabo aka Howard - c/o Daniel Slater	Sarah Thompson - c/o Daniel Slater

and upon the Plaintiff, Suzanne Shell, through her PACER Account, by e-mail and to:

Suzanne Shell  
 14053 Eastonville Rd.  
 Elbert, CO 80106

Dated: June 29, 2009 \_\_\_\_\_

  
 B. Dee Contreras

Exhibit 2 Blackball

From: Suzanne Shell <dsshell@ix.netcom.com>  
Subject: shellbash cygan  
Date: April 11, 2006 6:10:25 AM MDT  
To: dsshell@ix.netcom.com  
6 Attachments, 22.0 KB

Yahoo! My Yahoo! Mail Make Yahoo! your home page Search the Web Search  
YAHOO! GROUPS Sign In New User? Sign Up Groups Home - Help



bashingshell · shell\_bashing

- Home Messages Messages Help
- Messages
- Members Message #  Go
- Only
- Post Search:  Search
- Chat
- Files Up Thread | Message Index | View Source | Unwrap Lines Message 28 of 32 < Previous | Next >
- Photos Reply
- Links
- Database Forward
- Members
- Calendar
- Promote

Already a member? Sign in to Yahoo!

Yahoo! Groups Tips

Did you know...

You can search the group for older messages.

Yahoo! 360°

Keep connected to your friends and family through blogs, photos and more. Create your own 360° page now.

From: "family\_rights\_advocate" <family\_rights\_advocate@...> family right...  
Date: Tue Apr 11, 2006 7:07 am Offline  
Subject: Re: this forum was started for a reason Send Email

Well then someone did not look deep enough at her "situation" because she is FAR from indigent. Anbd don't think for a skinny minute she woyuld get away with not paying me damages I am NOT the moron she takes me for. As for her having things in hubbys name I could care less it is not even about GETTING anything from her she has nothing I want. It is about landing her fat bottom right where it belongs... ON THE STINKING CURB! As well dismantling her phoney lil empire! She reminds me of stinking darth vadar! Did you guiy's read her writings on abusers? WOW I swear she was looking dead in a mirror when she wrote that.

--- In bashingshell@yahooogroups.com, "shellbasher" <shellbasher@...> wrote:  
>  
> and get what i bet the farm is under her husband dennis shell and she  
> is indigent The link below will show that so all we can do is complain  
> and let her sue us so we can countersue 100% Free  
> http://thetruthistold.com/SUPREMECOURT.htm  
>  
> you know I realize this forum was started for a reason but two wrongs  
> do not a right make. We are no better then her if we sink to her low  
> low level. I get we are all mad and we should have a place to speak  
> open and freely but don't you guys think your taking this a bit far?  
> While I understand and sympathize with the venting and all it is just  
> getting petty and childish. We are all better then this guys. what we  
> should be doing is joining forces to sue her sorry butt!

This was a group open to the public view, where some of the defendants publicly conspired how to harm me and destroy my business.

**Subject:** Fwd: Re: [JFF-USA] A Public Message From Dennis M. Hinger  
**From:**  
**Date:** Thu, 3 Aug 2006 07:49:01 -0700 (PDT)  
**To:** dsshell@ix.netcom.com

Note: forwarded message attached.

Do You Yahoo!?  
Tired of spam? Yahoo! Mail has the best spam protection around  
<http://mail.yahoo.com>

**Subject:** Re: [JFF-USA] A Public Message From Dennis M. Hinger  
**From:** Paige Roberts <paige3274@yahoo.com>  
**Date:** Wed, 2 Aug 2006 14:01:07 -0700 (PDT)  
**To:** JFF-USA@yahoogroups.com

Parties to the conspiracy

=0) A plot...  
Paige

Proof that readers understood this message to be a conspiracy

Intent to conspire and to get others to join in the conspiracy

Connecticut DCF Watch <ct.dcf.watch@snet.net> wrote:  
Sent: Tuesday, August 01, 2006 9:30 PM  
Subject: Re: A Public Message From Dennis M. Hinger

<http://www.badadvocates.com/> New site hosted by Go Daddy.

Now this is my idea for what ever it is worth. Probably not much. Let them get it all up and running with all the horse pucky they want to put on it. Then we contact our respective law enforcement agencies and hammer Go Daddy with complaints from everyone in the groups. Shock and Awe them to death.

**FOR DISTRIBUTION TO ALL GROUPS AND MAILING LIST!**

OK Folks, Enough Is Enough,  
It is time to take a stand and put an end to the attempt to destroy this movement by a small band of AFRA Outcast... Yesterday Corrine Merwin aka "cermerwin" of Havana Florida posted on Suzannes Shells Family Rights Improvement Project that our President Wm. O. Tower of Fair Oaks CA. is "A Wanted Registered Child Molester"... Since this groups messages are open to the public and readable by all, this action offers conclusive proof that the only desire of Ms. Shell and her cohorts only desire is to destroy AFRA and it's top leadership and this movement... Let me clarify here that Mr. Tower is in no stretch of the imagination the Billy Ray Tower Corrine Merwin accuses him of being...  
#1. Billy Ray Tower is said to have lived on Stockton Blvd. In Sacramento... Mr. Wm. Tower has lived in Fair Oaks CA. Since arriving here with his family from Main several years ago...  
#2. Billy Ray, THIS SEX OFFENDER HAS BEEN IN VIOLATION OF REGISTRATION REQUIREMENTS SINCE 11/18/1997.  
Mr. Wm. Tower lived in Maine with his wife and children at this time...  
#3. Billy Ray is said to be, Date of Birth: 11-07-1945 (60 years of age)  
Sex: MALE  
Height: 5'8"  
Weight: 180  
Eye Color: BROWN  
Hair Color: BROWN  
Ethnicity: WHITE

--- Dennis Hinger <budhunter2@yahoo.com> wrote:  
Distribution list before being forwarded: **Defendants**  
**in BOLD**  
To: Groups AFRA BB <afra\_bb@yahoogroups.com>,  
Group AFRA\_Eagle <afra\_eagle@yahoogroups.com>,  
"aimee.l.dutkiewicz" <aimee.l.dutkiewicz@snet.net>,  
Bill Tower <wmtower@yahoo.com>,  
Wiseman Billy <president@nextfriend.us>,  
Dee Cardenez [Contreras] <dee7020@aol.com>,  
Wittman Charlie <theacf@hotmail.com>,  
Mark Cygan <ifac\_president@yahoo.com>,  
Ann Durand <annd122@aol.com>,  
Hession Greg <hession@crocker.com>,  
CaFRA Group <cafra@yahoogroups.com>,  
CenCom Group <afra\_cencom@yahoogroups.com>,  
Directors Group <afra\_directors@yahoogroups.com>,  
Helpline Group <afra\_helpline@yahoogroups.com>,  
Newshawk Group  
<afra\_newshawk@yahoogroups.com>,  
Talkline Group <afra\_talkline@yahoogroups.com>,  
Leonard Henderson <leonard@familyrights.us>,  
KAY HENSON <kayhenson@earthlink.net>,  
mbabymilan Kandy <mbabymilan@wi.rr.com>,  
Dorothy Kernagin <dorothy@cpsabuse.org>,  
Nancy Luckhurts <wolflady1@casair.net>,  
Mark Mark Cygan <rustydoo00@yahoo.com>,  
Blair Randy <blairs@ameritech.net>,  
Group Techline <afra\_techline@yahoogroups.com>,  
KATHY TILLEY <tilley\_kathy@yahoo.com>,  
Connecticut DCF Watch <ctdcfwatch@snet.net>  
From: Dennis Hinger <budhunter2@yahoo.com>

easy 1-click access to your groups.

Yahoo! Groups  
Start a group in 3 easy steps.  
Connect with others.

Wm. Tower is 53 years of age, Taller, and Heavier with greying black hair...  
#4. The picture displayed looks absolutely nothing like Wm. Tower and there are plenty of pictures of him going around the Internet to show this to anybody wanting real facts and not just out to destroy the credibility of a True leader in this movement...

The only similarity between Billy Ray Tower and Mr. Wm. O. Tower is that they are both Male and both White...

How can anybody claiming to be a Professional, certified, knowledgeable and trained FRAI advocate in this movement as does Ms. Shell and her cohorts including but not limited to Corrine Merwin post such damaging tripe on a group who's messages are open to not only the general public, but CPS and the Public Officials we try to work with...

It is my personal opinion and sincere belief that Ms. Shell reached some kind of a secret plea agreement when she plead and reached a settlement to her UPL charges in CO. and that now her only goal and intention is to completely destroy this movement... Therefore I call on all AFRA Members and persons of integrity to flood Yahoo groups with request to shut down her Family Advocacy Improvement Project Yahoo Group! I also call on all of you to Blackball Suzanne Shell and her cohorts from this movement and all groups and organizations that are a part of it...

← Proof of boycott of my and my associates' products and unfair trade practices.

I also wish to insure all of you that legal action and criminal prosecution is already in the works on this the latest action to discredit AFRA and AFRA leadership...

I know that Ms. Shell will not take this post lightly and will respond by posting stuff she has already threatened to post about me personally... All of her allegations are false and I have long ago replied to her charges with the true and correct version of everything she tried to twist into false allegations against me... So I say go ahead and post is Suzanne I'm sure you can use yet another lawsuit, I can prove beyond a reasonable doubt what I say, but nobody is going to take your word on anything anymore so you better be able to prove every thing you say...

Suzanne, you are currently throwing another tantrum threatening to get out of this movement if everybody doesn't support you, I say Do It, you are going to need every dime you can scrape together fighting the additional lawsuits currently being prepared...

Dennis M. Hinger

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No virus found in this incoming message.  
Checked by AVG Free Edition.  
Version: 7.1.394 / Virus Database: 268.10.5/404 - Release Date: 7/31/2006

[Non-text portions of this message have been removed]

[Non-text portions of this message have been removed]

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You are receiving Individual Emails [Change Delivery Settings](#)  
[Visit Your Group](#) | [Yahoo! Groups Terms of Use](#) | [Unsubscribe](#)

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Motion to Supplement Dee Contreras' Motion to Dismiss (#58) Based on New Evidence, and Supplement Thereto  
Case No. 1:09-CV-309 MSK-KMT

