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**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF ORANGE  
CENTRAL JUSTICE CENTER

**OCT 05 2012**

ALAN CARLSON, Clerk of the Court

1 JEFFER MANGELS BUTLER & MITCHELL LLP  
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Attorneys for Plaintiff, Citron Research

SUPERIOR COURT FOR THE STATE OF CALIFORNIA  
COUNTY OF ORANGE - CENTRAL JUSTICE CENTER

**30-2012**

**00603234**

CITRON RESEARCH, a dba of ANDREW LEFT.

CASE NO.

COMPLAINT FOR:

Plaintiff,

(1) DEFAMATION/LIBEL;

v.

(2) TRADE LIBEL; AND

BAI WENTAO, an individual; CHA LI, an individual; HEN DATONG, an individual; YORK CHEN, an individual; CADOL CHEUNG, an individual; DAVID HO, an individual; KAI-FU LEE, an individual; LI YUNLONG, an individual; JAMES MI, an individual; GAVIN NI, an individual; LAWRENCE PAN, an individual; XU XIAOPING, an individual; CHARLES XUE, an individual; ANDY YAN, an individual; RAYMOND YANG, an individual; YE DON, an individual; CHARLES YEN, an individual; JEFFREY ZENG, an individual; ZHOU WEI, an individual; DAVID ZHANG, an individual; ALLEN ZHU, an individual; FENG JUN, an individual; GONG HAIYAN, an individual; ALAN GUO, an individual; HE BOQUAN, an individual; JIANG TAO, an individual; RICKY LEI, an individual; LI YA, an individual; ALVIN LIU, an individual; RICHARD LIU, an individual; LIU WEI, an individual; NIU WENWEN, an individual; HERA SIU, an individual; SONG JUN, an individual; SUN TAORAN, an individual; TAN ZHI, an individual; WANG XIAOCHUAN, an individual; CHARLES WU, an individual; NICK YANG, an individual; YANG XIANGYANG, an individual; YU MINHONG, an individual; ZHANG YA-QIN, an individual;

(3) INJUNCTIVE RELIEF.

JUDGE RONALD L. BAUER

**By Fax**

JMBM  
Jeffer Mangels  
Butler & Mitchell LLP

1 ZHOU HONGYI, an individual; BAO FAN, an  
individual; CHEN HONG, an individual;  
2 WANG RAN, an individual; HENRY YANG,  
an individual; DAI KUN, an individual;  
3 HUANG GUANGMING, an individual; LAI  
WEIXIAO, an individual; EVAN SHEN, an  
4 individual; SONG YANLIN, an individual;  
WANG YU, an individual; XIE LEI, an  
5 individual; XI MING, an individual; XU  
HAILING, an individual; ZENG WEIJING, an  
6 individual; ZENG ZHAOXIA, an individual;  
VINSON ZHANG, an individual; ZHAO PU,  
7 an individual; ZHAO XUESONG, an  
individual; ALLEN ZHAO, an individual;  
8 ZHOU XIANG, an individual; ZHU NATHAN,  
an individual, ZUO LEI, an individual,  
9  
10 Defendants.

11 Plaintiff Citron Research (a dba of Andrew Left) ("Plaintiff" or "Citron Research" or  
12 "Citron") alleges on knowledge with respect to its own actions and on information and belief with  
13 respect to all other matters:

14 **NATURE OF THIS ACTION**

15 1. This is an action against defendants for defamation and injunctive relief. Plaintiff  
16 Citron Research operates one of the longest-running online stock commentary websites,  
17 www.citronresearch.com. Citron Research specializes, but not exclusively, in researching and  
18 reporting on companies that it believes to be engaged in fraud, or that it believes to have been  
19 promoted with misinformation, or that it believes to have been mistakenly overpriced by the stock  
20 market.

21 2. Citron Research is comprised of a team of investigators, including Andrew Left. Mr.  
22 Left has been featured as an expert commentator in a variety of media outlets, including Barron's,  
23 Wall Street Journal, CNBC, and CNNMoney. In 2012 he was a panelist at Columbia Business  
24 School's China Business Conference.

25 3. Citron Research has published over one hundred fifty (150) reports during the past  
26 eleven (11) years, covering more than one hundred and thirty (130) United States and Chinese  
27 companies. Citron has a remarkable record for accuracy in its reporting. It is known for having a  
28 keen nose for sniffing out problem companies. The Financial Times and other business publications

1 have reported on Citron's notable predictive accuracy. Citron has a long history of identifying  
 2 fraud, unsustainable business models, and overvalued public companies. Since 2006, Citron has  
 3 researched and published reports on, among others, twenty (20) Chinese companies listed on the  
 4 United States stock markets. Of these twenty (20) companies, sixteen (16) experienced ultimate  
 5 losses in value of sixty-six to one hundred percent (66% to 100%) -- losses which Citron would  
 6 deem catastrophic to investors -- and seven (7) have been delisted from trading in the United States.

7 A few examples of companies with respect to which Citron has published reports include:

8	Questcor Pharmaceuticals Inc.	NASDAQ: QCOR	7/10/2012	Department of Justice investigation of company's promotional practices, Sept 24, 2012.
9				
10	Deer Consumer Products Inc.	NASDAQ: DEER	4/4/2012	Halted by Nasdaq for "additional Information requested" on August 13, 2012.
11				
12	Longtop Financial Technologies Limited	NYSE: LFT	4/26/2011	SEC charge of failing to file current and accurate financial reports; stock deregistered by SEC.
13	China MediaExpress Holdings Inc.	NASDAQ: CCME	1/30/2011	Trading halted on March 11, 2011; later delisted from Nasdaq.
14	China Valves Technology Inc.	OTC Pink: CVVT	1/13/2011	Delisted from Nasdaq to pink sheets.
15	China-Biotics Inc.	NASDAQ: CHBT	8/30/2010	Trading halted June 15, 2011; later delisted from Nasdaq.
16				
17	New Oriental Education & Technology Group Inc.	NYSE. EDU	4/16/2009	SEC Investigation of company's financial statements.
18				
19	Life Partners Holdings Inc.	NASDAQ: LPHI	2/11/2009	Texas AG charge of securities fraud.
20	Amedisys Inc.	NASDAQ: AMED	8/12/2008	Department of Justice Investigation.
21	Ener1 Inc.	NASDAQ: HEV	7/16/2008	Chapter 11 bankruptcy declared Jan. 30, 2012.
22	Arthrocare Corp.	NASDAQ: ARTC	5/2/2008	Department of Justice charge of fraud for two former executives.
23	Basin Water Inc.	NASDAQ: BWTR	4/7/2008	SEC charge of accounting fraud; Chapter 11 bankruptcy declared.
24	Bidz.Com Inc.	NASDAQ: BIDZ	11/26/2007	SEC Investigation into company's inventory disclosures Feb. 10, 2009; company goes private at .78/share on May 17, 2012.
25				
26	Terra Nostra Resources Corp.	OTCBB: TNRO	10/24/2007	Delisted; Chapter 11 bankruptcy declared.
27	Home Solutions of America Inc.	NASDAQ: HSOA	9/25/2007	SEC charge of securities fraud.
28				

1	Hoku Scientific	NASDAQ: HOKU	6/6/2007	Delisting announcement, July 13, 2012.
2				
3	Xinhua Finance Media	NASDAQ: XFML	5/21/2007	Department of Justice charge of fraud.
4	Medis Technologies Ltd.	OTC Pink: MDTL	4/18/2007	Common stock delisted by Nasdaq Aug. 20, 2009.
5				

6           4.       Because Citron has accurately reported on risky, overvalued and/or fraudulent  
 7 companies, including Chinese companies traded on United States stock exchanges, Citron has  
 8 earned a positive reputation, and the investing public has come to rely on Citron's reports and  
 9 analyses to assist in their investment decisions. By warning its readers and other actual or potential  
 10 investors of the risks of investments in certain companies, Citron's reports have enabled its readers  
 11 and followers and other actual or potential investors to avoid hundreds of millions of dollars of  
 12 losses from ruinous investments in these speculative, overvalued and, in some cases, fraudulent  
 13 companies. Citron has become a credible reference for independent research in equity markets.

14           5.       Citron's reports are intended to bring, and have brought, transparency to the markets  
 15 (which might involve exposing questionable accounting practices, exposing situations where stocks  
 16 are overvalued based on a lack of information, or explaining company-provided information that  
 17 might be misleading or misunderstood by investors). As to any particular company, Citron writes  
 18 its report, investors focus on the issues Citron raises, and the investors make a decision to buy, hold  
 19 or sell, based on the information that is provided by both the company and Citron. That such  
 20 transparency might have led, or might lead, to lower stock prices for certain companies is plainly a  
 21 reflection of the market's valuation of those companies with better and more unfiltered information.

22           6.       Over the past two months, defendants Kai-Fu Lee and certain Chinese business  
 23 individuals have embarked on a campaign of false statements and accusations regarding Citron to  
 24 the investing public, the financial press, and the industry in which Plaintiff operates. The purpose  
 25 of Defendants' campaign of false statements and accusations is to wrongfully discredit Citron's  
 26 name, reputation and standing in the industry, and to persuade the investing public to disregard and  
 27 ignore Citron's reports and analyses. Defendants' campaign is premised on a letter condemning  
 28 Citron sent by defendant Kai-Fu Lee, and ratified and adopted by each of the other Defendants

1 through their respective co-signing of the letter (the "Condemnation Letter"). Defendants, including  
2 Kai-Fu Lee, also created an interactive United States website entitled www.citronfraud.com, and  
3 posted on it the Condemnation Letter and other defamatory content regarding Plaintiff. The media  
4 in California, the United States, and China, including the Wall Street Journal, which has a  
5 circulation of over one and a half million (1,500,000) in the United States, including California, and  
6 Bloomberg News, which has a circulation of over nine hundred thousand (900,000) in the United  
7 States, including California, have quoted Defendants' defamatory statements.

8 7. In the investment reporting community, a proven reputation for accuracy and  
9 reliability is critically important, and is the lifeblood of any successful research company. Although  
10 a new research company can start operations within a few months, it takes many years of precise  
11 analytical reporting to build up a base of followers. Defendants' defamatory statements have  
12 damaged and continue to damage Citron by falsely discrediting Citron's reports and analyses. But  
13 for Defendants' wrongful conduct, the investing public would continue to evaluate Citron  
14 Research's writing based on its merit and its long history of accurate reporting, rather than on the  
15 defamatory statements.

16 **JURISDICTION AND VENUE**

17  
18 8. Defendants' activities, as well as the events and occurrences giving rise to the claims  
19 alleged in the complaint, were directed at California residents, including Plaintiff. Defendants also  
20 know that many of Plaintiff's followers and readers, the investing public, and the investment  
21 community and industry in which Plaintiff operates, some of whom reside in California, would  
22 receive the defamatory statements through the Wall Street Journal, Bloomberg News, or other  
23 media sources. The defamatory content of Defendants' Condemnation Letter and the contents of  
24 Defendants' website, www.citronfraud.com, were, in fact, received by residents of California.  
25 Defendants also specifically targeted Plaintiff, a California resident, and knew that the defamation  
26 would have a direct and negative effect on the credibility and impact of Citron's reports and  
27 analyses, and that these effects would be felt in California.

28

**PARTIES**

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9. Plaintiff is a company doing business in Orange County, California.

10. At all relevant times, defendant Bai Wentao has his principal place of business in China.

11. At all relevant times, defendant Cha Li has his principal place of business in China.

12. At all relevant times, defendant Chen Datong has his principal place of business in California and was and is a resident of California.

13. At all relevant times, defendant York Chen has his principal place of business in China.

14. At all relevant times, defendant Cadol Cheung has his principal place of business in China.

15. At all relevant times, defendant David Ho has his principal place of business in China.

16. At all relevant times, defendant Kai-Fu Lee has his principal place of business in China.

17. At all relevant times, defendant Li Yunlong has his principal place of business in China.

18. At all relevant times, defendant James Mi has his principal place of business in California, and was and is a resident of California.

19. At all relevant times, defendant Gavin Ni has his principal place of business in China.

20. At all relevant times, defendant Lawrence Pan has his principal place of business in China.

21. At all relevant times, defendant Xu Xiaoping has his principal place of business in China.

22. At all relevant times, defendant Charles Xue has his principal place of business in China.

- 1           23.    At all relevant times, defendant Andy Yan has his principal place of business in  
2 China.
- 3           24.    At all relevant times, defendant Raymond Yang has his principal place of business in  
4 China.
- 5           25.    At all relevant times, defendant Ye Don has his principal place of business in China.
- 6           26.    At all relevant times, defendant Charles Yen has his principal place of business in  
7 China.
- 8           27.    At all relevant times, defendant Jeffrey Zeng has his principal place of business in  
9 China.
- 10          28.    At all relevant times, defendant Zhou Wei has his principal place of business in  
11 China.
- 12          29.    At all relevant times, defendant David Zhang has his principal place of business in  
13 China.
- 14          30.    At all relevant times, defendant Allen Zhu has his principal place of business in  
15 China.
- 16          31.    At all relevant times, defendant Feng Jun has his principal place of business in  
17 China.
- 18          32.    At all relevant times, defendant Gong Haiyan has his principal place of business in  
19 China.
- 20          33.    At all relevant times, defendant Alan Guo has his principal place of business in  
21 China.
- 22          34.    At all relevant times, defendant He Boquan has his principal place of business in  
23 China.
- 24          35.    At all relevant times, defendant Jiang Tao has his principal place of business in  
25 China.
- 26          36.    At all relevant times, defendant Ricky Lei has his principal place of business in  
27 China.
- 28          37.    At all relevant times, defendant Li Ya has his principal place of business in China.

- 1           38.    At all relevant times, defendant Alvin Liu has his principal place of business in  
2 China.
- 3           39.    At all relevant times, defendant Richard Liu has his principal place of business in  
4 China.
- 5           40.    At all relevant times, defendant Liu Wei has his principal place of business in China.
- 6           41.    At all relevant times, defendant Niu Wenwen has his principal place of business in  
7 China.
- 8           42.    At all relevant times, defendant Hera Siu has his principal place of business in China.
- 9           43.    At all relevant times, defendant Song Jun has his principal place of business in  
10 China.
- 11          44.    At all relevant times, defendant Sun Taoran has his principal place of business in  
12 China.
- 13          45.    At all relevant times, defendant Tan Zhi has his principal place of business in China.
- 14          46.    At all relevant times, defendant Wang Xiaochuan has his principal place of business  
15 in China.
- 16          47.    At all relevant times, defendant Charles Wu has his principal place of business in  
17 China.
- 18          48.    At all relevant times, defendant Nick Yang has his principal place of business in  
19 China.
- 20          49.    At all relevant times, defendant Yang Xiangyang has his principal place of business  
21 in China.
- 22          50.    At all relevant times, defendant Yu Minhong has his principal place of business in  
23 China.
- 24          51.    At all relevant times, defendant Zhang Ya-Qin has his principal place of business in  
25 China.
- 26          52.    At all relevant times, defendant Zhou Hongyi has his principal place of business in  
27 China.
- 28          53.    At all relevant times, defendant Bao Fan has his principal place of business in China.



- 1           54.     At all relevant times, defendant Chen Hong has his principal place of business in  
2 China.
- 3           55.     At all relevant times, defendant Wang Ran has his principal place of business in  
4 China.
- 5           56.     At all relevant times, defendant Henry Yang has his principal place of business in  
6 China.
- 7           57.     At all relevant times, defendant Dai Kun has his principal place of business in China.
- 8           58.     At all relevant times, defendant Huang Guangming has his principal place of  
9 business in China.
- 10          59.     At all relevant times, defendant Lai Weixiao has his principal place of business in  
11 China.
- 12          60.     At all relevant times, defendant Evan Shen has his principal place of business in  
13 China.
- 14          61.     At all relevant times, defendant Song Yanlin has his principal place of business in  
15 China.
- 16          62.     At all relevant times, defendant Wang Yu has his principal place of business in  
17 China.
- 18          63.     At all relevant times, defendant Xie Lei has his principal place of business in China.
- 19          64.     At all relevant times, defendant Xi Ming has his principal place of business in China.
- 20          65.     At all relevant times, defendant Xu Hailing has his principal place of business in  
21 China.
- 22          66.     At all relevant times, defendant Zeng Weijing has his principal place of business in  
23 China.
- 24          67.     At all relevant times, defendant Zeng Zhaoxia has his principal place of business in  
25 China.
- 26          68.     At all relevant times, defendant Vinson Zhang has his principal place of business in  
27 China.
- 28          69.     At all relevant times, defendant Zhao Pu has his principal place of business in China.

1           70.     At all relevant times, defendant Zhao Xuesong has his principal place of business in  
2 China.

3           71.     At all relevant times, defendant Allen Zhao has his principal place of business in  
4 China.

5           72.     At all relevant times, defendant Zhou Xiang has his principal place of business in  
6 China.

7           73.     At all relevant times, defendant Zhu Nathan has his principal place of business in  
8 China.

9           74.     At all relevant times, defendant Zuo Lei has his principal place of business in China.

10          75.     The true names and capacities, whether individual, corporate, associate, or otherwise,  
11 of defendants Does 1 through 50, inclusive, are unknown to Plaintiff at this time, and Plaintiff  
12 therefore sues said defendants by such fictitious names. Plaintiff is informed and believes, and  
13 thereon alleges, that each of the defendants designated as a fictitiously named defendant is, in some  
14 manner, responsible for the events and happenings referred to herein. Plaintiff will amend this  
15 complaint to show their true names and capacities when the same have been ascertained pursuant to  
16 Section 474 of the California Code of Civil Procedure.

17          76.     Plaintiff is informed and believes, and thereon alleges, that each of the defendants  
18 named in the caption of the complaint were at all times pertinent hereto, and are, the agents,  
19 servants, employees, joint venturers and partners of each of the other co-defendants, and were  
20 acting within the scope of their authority as such agents, servants, employees, joint venturers and  
21 partners, with the permission and consent of said co-defendants.

22          77.     In committing the wrongful acts alleged, defendants have pursued or joined in a  
23 common course of conduct and have acted in concert and conspired with one another in furtherance  
24 of their common plan or design. In addition to the wrongful conduct alleged as giving rise to  
25 primary liability, defendants further aided and abetted and/or assisted each other in breach of their  
26 respective duties. Unless otherwise indicated herein, the term Defendants shall refer to the named  
27 defendants and the Doe defendants.

28

**FIRST CAUSE OF ACTION**

(Defamation/Libel Against All Defendants)

1  
2  
3 78. Plaintiff realleges and incorporates herein by reference each and every allegation set  
4 forth in Paragraphs 1 through 77 as though set forth fully herein.

5 79. Defendants' campaign to harm Plaintiff began approximately two months ago with  
6 the Condemnation Letter, the creation of [www.citronfraud.com](http://www.citronfraud.com), and the posting on the website of  
7 the Condemnation Letter, as well as other defamatory content regarding Plaintiff. Through the  
8 foregoing, Defendants willfully and without justification or privilege caused to be published to  
9 other persons, the following untrue and unfounded statements, among others:

10 “However, recently some of these “China Short Sellers” [referring to  
11 Citron] started targeting legitimate companies with either no problems  
12 or minimal problems. Their reports would take advantage of the  
13 information asymmetry between China and the US, ***and boldly tell  
lies, knowing that their American readers have no way of verifying  
them.***”

14 “***Citron*** and other short sellers’ recent ***efforts to*** slam legitimate  
15 companies and ***deceive investors*** are despicable.”

16 “We are joining together to ***expose and condemn the deception*** and  
17 ignorance ***of Citron*** and other short sellers like them.”

18 “This English website ([citronfraud.com](http://citronfraud.com)) is being created to host this  
19 ***ongoing fight against fraud.***”

20 80. Defendants' statements disparaged Plaintiff in that the Defendants' statements falsely  
21 indicated that Plaintiff has lied, deceived, and/or defrauded its followers and readers, the investing  
22 public, and the investment community and industry in which Plaintiff operates. These statements  
23 are libelous on their face because they charge Plaintiff with dishonesty, deception, and fraud.

24 81. Defendants' statements were false, as Plaintiff has not lied to, deceived, or defrauded  
25 anyone. Defendant's falsehoods are especially outrageous given that Plaintiff has accurately  
26 reported on risky, overvalued and/or fraudulent Chinese and other businesses, and that by warning  
27 its readers and other actual or potential investors of the risks of investments in certain companies,  
28 Citron's reports have enabled its readers and followers and other actual or potential investors to

1 avoid hundreds of millions of dollars of losses from ruinous investments in these speculative,  
2 overvalued and, in some cases, fraudulent companies.

3 82. The statements of Defendants were made with knowledge of their falsity or with  
4 reckless disregard for their truth or falsity.

5 83. Without conceding it was required to do so, Plaintiff served on defendant publishers  
6 a demand for correction or retraction as provided in Civil Code Section 48a. Up to and including the  
7 date of the filing of this complaint, Defendants have failed and refused, and still fail and refuse, to  
8 publish a correction or retraction as required by law.

9 84. Citron has generated multi-eight figure profits over the past few years because of its  
10 reputation for accurate and insightful reporting on publicly-traded Chinese and United States  
11 companies. As a proximate result of Defendants' publication of the statements, Plaintiff has  
12 suffered injury to its business and pecuniary loss in a sum subject to proof at trial but in excess of  
13 thirty million dollars (\$30,000,000.00).

14 85. The aforementioned conduct of Defendants was done with the intention on the part  
15 of Defendants of depriving Plaintiff of its legal rights and otherwise causing Plaintiff injury. Such  
16 conduct was despicable and subjected Plaintiff to a cruel and unjust hardship in conscious disregard  
17 of Plaintiff's rights, so as to justify an award of exemplary and punitive damages.

18 **SECOND CAUSE OF ACTION**

19 (Trade Libel Against All Defendants)

20 86. Plaintiff realleges and incorporates herein by reference each and every allegation set  
21 forth in Paragraphs 1 through 85 as though set forth fully herein.

22 87. The foregoing conduct by Defendants constitutes trade libel. Defendants made false  
23 statements of fact concerning Plaintiff, the services it provides, and its reports. Defendants stated  
24 that Plaintiff has lied, deceived, and/or defrauded its subscribers, customers, the investment public,  
25 and the industry in which Plaintiff operated.

26 88. Defendants' statements were false, as Plaintiff has not lied to, deceived, or defrauded  
27 anyone. Moreover, Defendant's falsehoods are especially outrageous given that Plaintiff has  
28 accurately reported on risky, overvalued and/or fraudulent Chinese and other businesses, and that by

1 warning its readers and other actual or potential investors of the risks of investments in certain  
2 companies, Citron's reports have enabled its readers and followers and other actual or potential  
3 investors to avoid hundreds of millions of dollars of losses from ruinous investments in these  
4 speculative, overvalued and, in some cases, fraudulent companies.

5 89. The statements of Defendants were made with knowledge of their falsity or with  
6 reckless disregard for their truth or falsity.

7 90. As a direct and proximate result of Defendants' misconduct, Plaintiff has sustained  
8 significant damages in an amount to be proven at trial.

9 91. The aforementioned conduct of Defendants was done with the intention on the part  
10 of Defendants of thereby depriving Plaintiff of its legal rights and otherwise causing Plaintiff injury,  
11 Such conduct was despicable and subjected Plaintiff to a cruel and unjust hardship in conscious  
12 disregard of Plaintiff's rights, so as to justify an award of exemplary and punitive damages.

13 **THIRD CAUSE OF ACTION**

14 (Injunctive Relief Against All Defendants)

15 92. Plaintiff realleges and incorporates herein by reference each and every allegation set  
16 forth in Paragraphs 1 through 84 as though set forth fully herein.

17 93. Plaintiff is informed and believes, and based thereon alleges, that unless Defendants,  
18 and each of them, are restrained and enjoined by order of this Court, Defendants, and each of them,  
19 will continue to engage in the conduct alleged herein. Such conduct will result in irreparable harm  
20 to Plaintiff. The threat of such irreparable and permanent damage justifies the issuance by this  
21 Court of a permanent injunction.

22 94. Furthermore, Plaintiff is entitled to a permanent injunction because monetary  
23 damages will not adequately compensate Plaintiff for the harm caused by Defendants, and each of  
24 them, or the future harm will ensure, and injunctive relief is necessary to prevent multiple lawsuits.

25 95. Plaintiff has no adequate remedy at law for the injuries caused by Defendants, and  
26 each of them, and Plaintiff will continue to suffer great and irreparable injury in the future unless  
27 and until Defendants, and each of them, are restrained and enjoined by this Court from engaging in  
28 the conduct alleged herein.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff demands judgment against Defendants as follows:

1. For an award of compensatory, special, and consequential damages according to proof at trial but in excess of thirty million dollars (\$30,000,000.00).
2. For a permanent injunction enjoining: Defendants, and Defendants' agents, servants, and employees, and all persons acting under or in concert with them, to:
  - (a) issue a retraction of their libelous Condemnation Letter and apologize for having published such false and unfounded statements;
  - (b) request that each publisher who has carried the libelous communication, including, without limitation, the Wall Street Journal and Bloomberg News, to publish the retraction and apology;
  - (c) remove the name of the website "citronfraud.com" and cease using the domain "citronfraud.com"; and
  - (d) cease and desist in the future from making any other statements proved to be false and/or defamatory at trial;
3. For punitive and/or exemplary damages;
4. For an award of costs and disbursements in this action; and
5. For such other relief as the Court deems just and proper.

DATED: October 5, 2012

JEFFER MANGELS BUTLER & MITCHELL LLP

By: 

MARK S. ADAMS  
Attorneys for Plaintiff CITRON RESEARCH