

SUPPLEMENTAL ATTACHMENT  
CONTINUATION TO FIRST CAUSE OF ACTION-9821(3)

The facts supporting plaintiff's claim are as follows:

1. Plaintiff was arrested on July 13<sup>th</sup>, 1999, at the San Fernando Valley Parole Unit. Defendant Purdy was present during Plaintiff's arrest and defendant Purdy received DNA samples from Plaintiff on July 13<sup>th</sup>, 1999.
2. While Plaintiff was located in the LOS ANGELES MENS CENTRAL COUNTY JAIL: On August 19, 1999, defendant Purdy arrived at the LA COUNTY JAIL to arrest Plaintiff. A robbery that occurred on February 8<sup>th</sup>, 1999, (whereby the victim Christopher Rawlings was murdered as a result of a high speed chase by LAPD) caused the Plaintiff to be read the admonition of his rights by defendant Purdy on August 19, 1999. Plaintiff stated "he understood but refused to waive" his rights and never made any statements against the interest of any other person nor against the interest of himself. A copy of Plaintiff's Parole Arrest Report dated 7-13-1999 and defendant Purdy's Arrest Report and Continuation Sheet is attached hereto. See Exhibit "R".
3. On August 20, 1999, defendant Shellie Samuels, filed an INFORMATION at NORTHWEST DISTRICT VAN NUYS SUPERIOR COURT entitled KIRELL TAYLOR, case no. LA033959. The case was considered a high-profile case and Plaintiff maintained that he had no knowledge of the crimes committed. On August 27<sup>th</sup>, 1999, defendant SAMUELS conspired with the Magistrate to breach the terms of Penal Code § 859b to violate Plaintiff's speedy preliminary trial over Plaintiff's objection and proceeded without jurisdiction.
4. Plaintiff represented himself as the attorney of Record and judgment was entered against him on October 17, 2001, to serve life in State prison.
5. During Pre-trial stages of the foregoing case, defendants Purdy and Samuels amended the INFORMATION to include BORIS GRAHAM as a co-defendant based on allegations asserted by MICHAEL PARKS; not Plaintiff.
6. As Plaintiff, KIRELL FRANCIS BETTIS-TAYLOR, set in the CALIFORNIA DEPARTMENT OF CORRECTIONS, each defendant agreed with each other and maliciously conspired to represent Plaintiff in a false light by making slanderous false statements against Plaintiff by calling him a "snitch" in the event BORIS GRAHAM is captured. A conspiracy was set forth by State actors privately conspiring with private citizens while employed under the color of state law and during the actors private time off duty. Defendant ~~Samuels~~ Samuels and Purdy are being sued as private

citizens in their off duty capacity and judgment is sought in their private capacity.

7. In February of 2004, the camera crew belonging to AMERICA'S MOST WANTED and; host, John Walsh, dependants, were on the arrest scene when BORIS GRAHAM was captured by authorities in the State of Florida.

8. John Walsh & America's Most Wanted prepared a segment to be aired by dependants, Twentieth Century Fox Film Corporation and owner Rupert Murdoch, with the specific intent of falsely labelling Plaintiff a "snitch."

9. Dependants Purdy and Samuels informed John Walsh, America's Most Wanted, Rupert Murdoch and Twentieth Century Fox that Plaintiff did NOT "snitch" on BORIS GRAHAM, however, if statements could be made to the effect that he did snitch on BORIS GRAHAM it would teach Plaintiff a lesson not to taunt [the] dependants Purdy and Samuels.

10. Dependants John Walsh, Rupert Murdoch, America's Most Wanted and Twentieth Century Fox Film conspired and agreed to make a false statement against Plaintiff to the effect Plaintiff snitched on BORIS GRAHAM in 1999. Hence a pre-recorded segment of America's Most Wanted was prepared/edited.

11. On March 20<sup>th</sup>, 2004, Rupert Murdoch and Twentieth Century Fox Film televised the recorded segment by John Walsh and America's Most Wanted which resulted in the defamation of Plaintiff by having shown courtroom pictures of Plaintiff without his consent and by having allowed John Walsh to make willful malicious false statements that Plaintiff "snitched" on BORIS GRAHAM, on or around Plaintiff's arrest.

12. On March 20<sup>th</sup>, 2004, the dependants successfully conspired with each other to maliciously slander and defame the character of Plaintiff on national television. In addition, dependants are guilty of "libel" due to the fact a transcription of the segment having defamed Plaintiff to the effect he snitched on BORIS GRAHAM, can be printed from data prepared by America's Most Wanted. The conspiracy to slander Plaintiff was intentional and set forth in an attempt to have Plaintiff murdered in state prison.

8<sup>th</sup> Amendment Violation - SECOND CAUSE OF ACTION - Failure to Protect

13. The dependants acted with malice and invaded the privacy of Plaintiff with false statements and a reckless disregard to the nature of the statements. The dependants did not contact prison officials prior to airing the false statements in an attempt to notify prison officials at the Prison, Plaintiff was located at, that his safety was in danger by virtue of the false statements actually spoken by defendant John Walsh on March 20<sup>th</sup>, 2004.

14. On July 12, 2004, after several attempts to be placed in protective custody by prison officials; Plaintiff was attacked with an inmate-manufactured weapon by inmate Lamont Crossley, CDC# K-82991, as a result of the defendants' collusion in labelling Plaintiff a "snitch" unjustly. "Courts have long recognized that being labeled a snitch in the prison environment can indeed pose a threat to an inmate's health and safety in violation of the Eight Amendment." DAVIS V. HILL, 401 F. Supp. 2d 756-57 (S.D. Tex. 2005). Inmate Crossley was forced to try to kill Plaintiff or face being killed himself.

15. Plaintiff sued the prison officials because the officials neglected to protect plaintiff after the foregoing defendants acts and omission. See the settled Action filed with the U.S. District Court for the Sacramento Eastern District Court of California entitled KIRELL TAYLOR VS. MIKE KNOWLES, 2:05-cv-1412-GEB-KJM. Plaintiff was caused by defendant 20th Fox Film to be sliced up with a razor after being labeled a "snitch". Plaintiff suffered a deep razor wound to the back of his left medial tricep and neck. A copy of Plaintiff's administrative exhausted appeal is hereby attached. See Exhibit "B".

16. Plaintiff caused defendant Purdy and Samuels, to visit Plaintiff at KERN VALLEY STATE PRISON on September 21, 2006, by having written defendants a contrived letter implicating BORIS GRAHAM in the murder of Mr. Rawlings. The defendants tape-recorded Plaintiff's false statements against BORIS GRAHAM and the defendants admitted that Plaintiff had not snitched on BORIS GRAHAM and acted like they did not know why defendant John Walsh made false statements about Plaintiff which was aired on March 20, 2004. The prison interview between Plaintiff and defendants was transcribed and given to BORIS GRAHAM'S counsel, MARLYN VAN [REDACTED] Los Angeles, CA 90012 [REDACTED]

17. Defendant Shellie Samuels, put in an order for Plaintiff to be called from KERN VALLEY STATE PRISON as a prosecution witness. On February 28th, 2007, Plaintiff was transported to the MENS CENTRAL JAIL at the behest of defendant Samuels and not housed in protective custody for almost two months. Plaintiff made several calls to be housed in Protective Custody and defendant Samuels told Plaintiff to "deal with it. You're a big boy."

18. On September 25th thru 27th, 2007, defendants, Samuels and Purdy, called Plaintiff to testify against BORIS GRAHAM in THE PEOPLES V. BORIS GRAHAM, case # LA046159. The Plaintiff testified in favor of Mr. Graham and told the jury he lied deliberately on Mr. Graham during the September 21st, 2006, prison interview because defendants aired false statements on March 20th, 2004, that slandered Plaintiff's good name, put his life in danger, caused him post-traumatic stress disorders and to be ridiculed by prisoners in general populations of jail, including being ridiculed by people in society.

## TIMELINESS OF ACTION

Plaintiff has submitted this complaint to the United States District Court and each time the action was dismissed on Jurisdictional grounds:

First Action Filed on April 21, 2005 and dismissed on May 18, 2005. Filed in the Eastern U.S. District Court for the Sacramento Division of California. KIRELL TAYLOR V. JOHN WALSH, 2:05-CV-01147-JSW

Second Action Filed on May 1, 2006 and dismissed on April 14, 2008. Filed in the Eastern U.S. District Court for the Sacramento Division of California under KIRELL FRANCIS BETTIS V. JOHN WALSH, 2:06-CV-0943-DFL-PAN and transferred to:

The Fresno Division under case # 1:06-cv-0782-LJO-DLB.

Third Action Filed on October 27, 2008 and appeal dismissed on June 3, 2009. Filed in the Fresno Division of California under KIRELL FRANCIS BETTIS-TAYLOR V. TWENTZETH CENTURY FOX FILM CORPORATION, 1:08-CV-01631-OWN-DLB.

Fourth Action Filed on June 1, 2009 and dismissed on July 2, 2009, with directions to file in the State court where jurisdiction is conferred. Filed in the Fresno Division of California under KIRELL FRANCIS BETTIS-TAYLOR V. TWENTZETH CENTURY FOX FILM CORPORATION, 1:09-CV-00949-LJO-SMS.

## PARTIES

1. Twentieth Century Fox Film Corp.; America's Most Wanted; Rupert Murdoch; and John Walsh can be located at: 20th Century Fox Film Corp., 10201 WEST PICO BLVD., LOS ANGELES, CA 90035. Agent for Service of Process, GARY D. ROBERTS
2. Andrew Purdy can be located at: WEST VALLEY LOS ANGELES POLICE DIVISION, Reseda, California.
3. Shellie Samuels can be located at: District Attorney's Office 6230 SYLMAR AVENUE, Suite 201, VAN NUYS, CA 91401

## CAPACITY

Defendants are being sued in their individual and official capacity, as well as in their off duty capacity, as private citizens.

## PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that this Court will enter a judgment on Plaintiff's behalf and in Plaintiff's favor as follows:

1. Award Plaintiff with a judgment in the sum of \$300,000,000.00 (Three Hundred Million Dollars) to be paid by defendant Twentieth Century Fox Film Corporation in the nature of punitive damages;
2. Award Plaintiff with a judgment in the sum of \$3,000,000.00 (Three Million Dollars) to be paid by defendant Shellie Samuels;
3. Award Plaintiff with a judgment in the sum of \$3,000,000.00 (Three Million Dollars) to be paid by defendant Andrew Purdy;
4. Award Plaintiff with a judgment in the sum of \$50,000,000.00 (Fifty Million Dollars) to be paid by defendant John Walsh;
5. Award Plaintiff with a judgment in the sum of \$50,000,000.00 (Fifty Million Dollars) to be paid by defendant Rupert Murdoch;
6. Award Plaintiff with a judgment in the sum of \$100,000,000.00 (One Hundred Million Dollars) to be paid by defendant America's Most Wanted;
7. Award Plaintiff with a Jury Trial in this action by 12 Jurors; and
8. Order defendants to appear together or otherwise to re-air the March 20th, 2004, segment recanting the false statements to the effect that Plaintiff "snitched" on co-defendant BORIS GRAHAM, and order alternatively that defendant S. Samuels recants and set aside the felony complaint for a breach of Penal Code § 8596.

### VERIFICATION

I issue this attachment to the complaint in sound mind, with the intent and purposes set forth herein, and I declare under penalty of perjury under the laws of the State of California, that the foregoing causes of action, and the statements throughout this complaint, attachment and verification, are true and correct. And, as to matters stated upon information and belief, I believe them to be true.

Executed on this July 13<sup>th</sup>, 2009.

Kirell Francis Bettis  
Kirell Francis Bettis  
By Kirell Francis Bettis  
In Pro Se