

FILED
04-26-2022
CIRCUIT COURT
DANE COUNTY, WI
2018CV003122

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

LEONARD POZNER,

Plaintiff,

vs.

Case No. 18CV3122

JAMES FETZER,

Defendant.

PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR TURNOVER OF PROPERTY
TO APPLY PROPERTY TO SATISFY JUDGMENT

TO: JAMES FETZER
800 Violet Lane
Oregon, WI 53575

PLEASE TAKE NOTICE that Plaintiff, by and through his undersigned counsel, and based upon the Affidavit of Randy J. Pflum ("Pflum Aff.") attached hereto and incorporated herein, moves the Court for an Order that as much of the Defendant's property listed on Exhibit 1 to the Pflum Affidavit as necessary be turned over and applied to satisfy the Judgment, which was entered in the above-entitled action in favor of Plaintiff.

PLEASE TAKE FURTHER NOTICE that the Court will hear this Motion at a date and time provided in the future by the Court or as soon as thereafter as counsel may be heard before the Honorable Frank D. Remington, Circuit Court Judge for Dane County, Wisconsin, at the Dane County Courthouse located at 215 S. Hamilton St., Room 1000, Madison, WI 53703.

Dated: April 26, 2022.

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Electronically signed by Randy J. Pflum
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Attorneys for Plaintiff Leonard Pozner

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

LEONARD POZNER,

Plaintiff,

vs.

Case No. 18CV3122

JAMES FETZER,

Defendant.

AFFIDAVIT OF RANDY J. PFLUM IN SUPPORT OF PLAINTIFF'S MOTION
FOR ORDER FOR TURNOVER OF DEFENDANT'S
PROPERTY TO SATISFY JUDGMENT

STATE OF WISCONSIN)

) ss.

COUNTY OF DANE)

Randy J. Pflum, being first duly sworn, on oath states and alleges that:

1. He is one of the attorneys for the Plaintiff, Leonard Pozner, in the above entitled action.
2. The Plaintiff obtained a judgment against Defendant, James Fetzer, on December 12, 2019, in the Circuit Court for Dane County, Wisconsin, in the sum of \$457,395.13, including costs and damages.
3. The above judgment remains unsatisfied in an amount not less than \$457,395.13.

4. On March 3, 2020, a Supplementary Proceeding was held before the Dane County Supplemental Court Commissioner Bryan Cahill at the offices of Godfrey & Kahn, S.C., One East Main Street, Suite 500, Madison, WI.

5. The Supplementary Proceeding revealed that Defendant owns or has an interest in certain non-exempt unregistered works listed on Exhibit 1 (attached), which may be applied to satisfy the above Judgment.

6. During the Supplementary Proceeding, Defendant testified that since 2015 he edited and/or authored at least nine books for Moon Rock Books, namely, *Nobody Died at Sandy Hook*. As part of the Supplementary Proceeding, Defendant also identified certain domain name and/or websites listed on Exhibit 1.

7. On information and belief, Moon Rock Books, which published certain editions of *Nobody Died at Sandy Hook* between 2015 and 2016 disclaimed any ownership interest or other claim to the books listed on Exhibit 1.

8. This Affidavit is made in support of a motion for an order under Wis. Stats. § 816.08 to apply James Fetzer's non-exempt property to satisfy the above Judgment.


Randy J. Pflum

Subscribed and sworn to before me
this 7th day of April, 2022

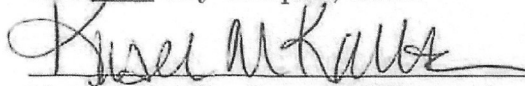

Notary Public, State of Wisconsin
My Commission expires: 8/14/2024

EXHIBIT 1**Books**

Nobody Died At Sandy Hook, 1st Edition (2015)

Nobody Died At Sandy Hook, Banned Edition (2015)

Nobody Died At Sandy Hook, PDF Edition (2015)

Nobody Died At Sandy Hook, 2nd Edition (2016)

Domain and Websites

www.jamesfetzer.org

www.jamesfetzer.net

www.falseflagnews.org

www.falseflagnews.net