

1. COMPLAINT

2. Plaintiff, Self-Represented: Pro Se

3. Russell Martin

4. 5251 Lindell Rd. #103

5. Las Vegas, NV 89118

6. [RussMartin1@StarSEO.us](mailto:RussMartin1@StarSEO.us)

7. **EIGHTH JUDICIAL DISTRICT COURT**

8. **CLARK COUNTY**

9. Russell Martin - **Plaintiff**

10. Vs.

11. **Defendant(s) Individually**

12. Small Claims, Eric Goodman

Case No: \_\_\_\_\_

Dept. No: \_\_\_\_\_

13. **COMPLAINT**

14. Plaintiff, **Russell Martin**, in proper person, files against Defendant, Eric Goodman, Small

15. Claims, Individually inclusive as follows for injunctive relief for past and future injuries as outlined below. These claims are based upon existing Tort Law and part of the listed Tort Civil Complaint.

16. **PARTIES**

17. 1. Plaintiff, **Russell Martin**, (hereinafter "Martin") is an individual who is currently, and was at all  
18. relevant times herein, a resident of 5251 Lindell Rd. #103 Las Vegas, NV 89118 the State of Nevada,  
19. County of Clark, City Of Las Vegas.

20. 2. Defendant, Eric Goodman, Judge, Small Claims hereinafter ("Goodman") and location of the Court

21. 200 Lewis Ave. Las Vegas, NV 89155.

22. 4. Defendant, Small Claims hereinafter ("Small Claims") 200 Lewis Ave. Las Vegas, NV 89155

23. **Unknown Names, Corporations and Addresses**

24. The names and capacities, whether individual, corporate, associate, or otherwise of

25. Defendants, witnesses and /or their alter egos sued herein and ROE Business Entities

26. inclusive/Government Organization, are presently unknown, and Plaintiff will amend this complaint to

27. insert the name(s) when ascertained.

28. **FACTS**

29. Plaintiff Goodman is an individual who supported the persecution of Martin by the legal justice system.

30. **Goodman** committed criminal acts of court manipulation to convey a judgement of guilty upon Russell

31. Martin. The objective all be it undisclosed but still clear do to its transparent actions taken by **Goodman**.

32. **Goodman** violated rules of Due Process of discovery and disclosure. **Goodman** set up a court narrative

33. with intent to support Nevada State Prosecutor to find Martin guilty. **Goodman was given a clear**

34. **disclosure of events** from Martin before court started. **Goodman** failed to refer and inquire based on

35. typed document of the events that happened. Most import – Robert Moos conveying “Your Not

36. Playing” this is a command routed in the foundations of Moos training as a retired police officer.

37. **Goodman** objective was to ignore obvious and redirect to his objective. The same as Moos.

38. Defendant Moos an individual who started the chain of events by lying to police about a confrontation

39. between Moos and Martin at LVAC on September 9, 2019. On September 9, 2019, Martin met Moos in

40. the LVAC at about 4:30 pm. Martin signed up on the board for the next game putting himself last on the

41. list as required by LVACrules. Moos informed Russ that the next game was already arranged for four

42. other members to play. However, Moos's verbal disclosure to Martin did not follow LVAC club

43. racquetball rules. Martin sat down on the waiting bench opposite the closed door of the racquetball  
44. area. The court was being occupied by Chris Adamson and Paul Henderson, another member playing a  
45. game. The game ended and Chris Adamson lost the match. Chris Adamson and Paul left the court  
46. whereby Chris Adamson sat beside Russ Martin and in short opened a polite conversation with Martin  
47. about the match. Adamson disclosed to Martin that he did not want to play the next game (Notarized  
48. Statement-Exhibit A) Martin told Chris Adamson that if he wished Adamson could play the next game.  
49. Martin would wait. Chris Adamson reaffirmed he was not interested in playing anymore. Moos was in  
50. the racquetball court, represented by Soule's statement, Moos and Chris Adamson's. Moos came out of  
51. the court when Martin stood up whereupon Martin was confronted by Moos telling Martin, "You're Not  
52. Playing". Martin replied to Moos that he was next to play. Moos replied again with the same  
53. statements. Martin considered that Moos did not hear him or Chris Adamson telling Moos that Martin  
54. was next to play. Martin leaned forward telling Moos that Chris Adamson did not want to play. Moos  
55. then closed the distance putting his face to Martin's face and told him again "You're Not Playing" and  
56. spitting. Moos was wearing a baseball cap whereby the bill of the hat hit Martin's glasses and his  
57. forehead. Moos gave statement to this during Small Claims disclosures. Moos violated customary  
58. politeness to maintain space between men. Martin was scared and wanted Moos away so he reached  
59. above Moos's head with his left hand placed on Moos's hat and forehead pushing him away. Moos  
60. responded by hitting Martin on the forehead with his racquet using it like a hatchet. Martin claims it  
61. caused him to black out. This was not a defensive response to being pushed away. This was an attack  
62. with lethal intent. As a retired policeman he is trained in combat. Martin responded by swinging his  
63. racquet at Moos but Moos was falling back through the racquet door that must have been open. Moos  
64. fell through the open door onto the Racquetball court floor striking the back of his head on the floor. As

65. per evidence of blood and location of Moos.

66. **Defendant**

67. Small Claims Eric Goodman Judge

68. **Goodman**

69. **Goodman** engaged officer Villannueva without giving prior notice to Russell Martin. This is a tactic to  
70. engage a narrative. In the transcripts the clerk on page 2 line 21 asks Villannueva if he is going to be a  
71. witness to the case? Villannueva was not at the club when the event happened therefor not qualified to  
72. represent himself as a witness. Villanueva replys (YES) This is a clear set up. On page 4 line 22  
73. Villanueva reports that a **crime scene analyst** took pictures of Moos at hospital as well as at the LVAC.  
74. Where are the pictures of Russ Martin? Moos represents that damages to his legs were caused by the  
75. fight. Crime scene analyst at the hospital failed to ask a simple question. Moos do you have a health  
76. problem that causes your legs to be bruised? Why do you wear long support socks? **Goodman** does not  
77. respond requesting pictures of Russell Martin by design to complete an objective to commit a  
78. judgement upon Russell Martin. On page 5 Line 1 through 15 Villanueva report represents statement  
79. from Russ Martin that is true and effective accept how does Villanueva know the difference between  
80. Martin conveying a message politely and Moos conveying an a demand. Moos commanding a demand  
81. that he is not authorized by LVAC to manage. **Goodman** again fails to inject and review the report that  
82. he has possession of from Martin. **Goodman** never referred to typed reports given by Martin as a  
83. reference to facts. Villanueva is lying that there was an argument. He has no knowledge to make this  
84. statement. Where Villanueva body videos to verify this statement. **Goodman** fails to observe structure  
85. and details and as a professional his only excuse is he does not want to achieve the truth. On Line 22 to  
86. 24 Robert Moos asked Villannueva if he believe that Robert Moos Lied about events. Villannueva

87. reported NO. (This is Villanueva next representation he is not qualified to make. He was not at the  
88. crime scene. Villanueva is making statements with intent to support his arrest report narrative that  
89. Martin was angry and aggressive. Goodman should have observed this as lack of professional skills of  
90. the police officer or crime scene investigator. Goodman did not respond. Moos asks Villanueva if he  
91. believes the witness statements to be lies? Villanueva reports NO. (This again is a bold misleading  
92. statement by Villanueva who lacks professional skills, training and ethics.) How can he make a  
93. statement of this value without verifying content? Goodman fails to verify witness statements. Page 6  
94. Line 9 Martin reports that he did not know Villanueva was going to represent himself as a witness and  
95. knows that there are elements of the actions that he doesn't understand or have time to prepare.  
96. Goodman fails to perform as a professional directing questions to Villannueva to clarify and find the  
97. truth when he knows that Martin is under pressure and not a professional. Page 8 line 13 Robert Moos  
98. reports that he went into the courts and this is what he is supposed to do. Page 8 line 15 Robert reports  
99. that he started to come out of the court. (This is not normal) Why did he come out of the court?  
100. Villanueva is lying that there was an argument. He has no knowledge to make this statement. Where  
101. Villanueva body videos to verify this statement. Goodman never asked why he came out of the court?  
102. Again fails to verify location of altercation. Page 8 line 17 Robert reports that I came to him Nose To  
103. Nose. (This is when Goodman fails to inject any inquiring questions again.) (Structure always discloses  
104. the liar) Page 9 line 10 Moos reports that he was bleeding from the back of his head. There is no way I  
105. could have caused the damages to the back of his head with my racquet. Page 9 Line 16 Goodman  
106. asked Martin if I was convicted of a crime do to this action. I failed to communicate effectively. I  
107. reported "Yeah" My mind was confused. I was thinking the question was I arrested for this crime! If  
108. you look how I am communicating a professional would know that I am confused and not

109. communicating the right answer to the question. Goodman fails as a professional to verify my  
110. statement when my following statements represent that I am still in defending myself and not  
111. convicted of the crime. Goodman lacks professional skills to go on line with the court system to verify if  
112. I have been convicted. From there he would know I was not convicted and still defending myself. This is  
113. a clear violation of court procedures. Page 9 Line 19 represents that I am confused and I am  
114. communicating the arrest charges. Page 9 Line 21 Goodman asks if I have been convicted of a felony  
115. charge? On line 22 I represent NO This means that I have not been convicted of the crime of assault  
116. and battery felony charges upon Robert Moos. Page 9 Line 24 I report "That's why I was trying last yeah  
117. to make sure that we finished that up before we came to this. "Do you Follow Me" Goodman "YES"  
118. Page 10 Line 15 Goodman asks me for my version of events. The remaining report of my version of  
119. events is accurate. Page 11 line 4 first communication from Moos that "You're Not Playing". This was  
120. not polite. Page 11 line 25 "You're Not Playing". Page 12 line 1 Moos repeats himself. This is not a polite  
121. conveying or communication. I gave written disclosures before court started Goodman had the same  
122. disclosure of the events to prepare himself to be a professional judge.

123. Goodman I know at this point that because Goodman will not review my disclosures his judgement is  
124. going to be nefarious and not in my favor. The rest is a waste of time.

125. Goodman List of Failures.

126. Goodman requested the arresting police officer Villannueva to reflect on subjects he is not qualified to  
127. make and he cannot verify and or did not verify.

128. Goodman requested the arresting police officer to attend without giving prior disclosure to Russ Martin.

129. Goodman failed to obtain pictures of Russ Martin facial damages. This is a criminal tactic to withhold  
130. evidence. The police system will not give police videos to Russ Martin as disclosed before arrest.

131. **Goodman** failed to ask what are the jobs Martin and Moos performed?
132. **Goodman** failed to observe the Nevada laws of Felony Assault and Battery in Nevada when and how a
133. person can protect themselves by objective.
134. **Goodman** failed to structure the events of the day and ask relevant questions.
135. **Goodman** failed to observe that when Moos removed himself from the court with objective to confront
136. Martin. This is a premeditated objective. When Moos stepped into the path of Martin he has a choice to
137. confront Russ or go to LVAC management for assistance. Moos choose to take command to convey his
138. objective. This is premediated objective. When Moos pressed his face into Martins face this was Moos
139. acting as a police officer pressing his objective and willingness to risk confrontation. When Martin
140. pushed Moos away Moos's anger controlled him to the point he was willing to use lethal actions to
141. convey his power over Martin and thus struck Martin with his racquet using it not in a protective
142. manner but like a hatchet with intent to cause bodily harm or death of Martin.

#### **CLAIMS FOR RELIEF (Individually)**

143. Plaintiff Martin has always performed his duties of full and honest disclosure to Moos, LVAC, Police,
144. Public Defenders, and Judges.
145. A. Defendant **Goodman** court decision cannot be supported by facts or disclosures given by opposing
146. party or Villanneuva. Defendant **Goodman** violated the rules of professional ethics with intent to defraud
147. Martin into pleading guilty. To achieve this **Goodman** withheld knowledge of facts, withheld disclosure
148. to verify police statements, failed to call a single witness but did invite Villanueva to court and failed to
149. get police pictures and videos to verify truth in Villannueva statements.
150. **Goodman** decision and court action should have been delayed until State of Nevada vs Russell Martin is

151. finished. This is a case of premeditated assault with intent to use deadly force with a weapon upon an  
152. elderly person by a professional retired police officer. **Goodman** removed himself from inquiring  
153. important standard structure questions to cement a guilty verdict on Russell Martin. This is criminal  
154. intent to continue the police officers criminal narrative report supporting the State of Nevada objective  
155. to convict Russell Martin of charges.

156. My income has continued to decline do the legal systems abusive control of legal narratives to induce  
157. Russell Martin to plead guilty. My damages are GYMStarPro weight lifting calculator has manifested into  
158. loss of programming team and intent to start sells at LVAC or other clubs. This will take one year to  
159. redevelop on new software platform and team. Martin has lost StarSEO clients due to time invested  
160. defending himself from Moos and the legal system. Russ Martin has to endure a cost of \$10,000 dollars  
161. plus interest. Martin's income drop caused him to fail to afford insurance on motorcycles before they  
162. were stolen he has lost 20,000 dollar investment.

163. **REQUEST/PRAAYER FOR RELIEF**

164. WHEREFORE, Plaintiff requests the following relief for both past, present, and future damages. Financial  
165. damages have been incurred by the said Plaintiff as his loss of income, loss of insurance causing  
166. loss on stolen quads and reputation. Emotional damages have also been incurred, and these may never  
167. fully heal. The plaintiff himself, Russell L. Martin, is also considered a Senior citizen and this raises  
168. concerns as to the treatment of an older individual within the confine of the Nevada Legal System. Loss  
169. of current business has occurred and of course, the impact on reputation will indeed remain for life and  
170. incur even further losses.

171. 1. **Goodman** - \$250,000 Plus Court and Legal Fees
172. 2. **Small Claims** - \$250,000 Plus Court and Legal Fees



- A. Compensatory damages loss of StarSEO income over three years \$75,000.00
- B. Loss of Income GYMStarPro Athletic Calculator Sells income over three years \$100,000.00
- C. Loss of Stolen Yamaha 650 and 700 Raptor Quad Motorcycles. Could not pay Insurance Due to legal issues. \$20,000.00 Two quads and custom trailer, plus equipment.
- D. Moving Expenses – Robert Moos is a retired police officer a liar and threat to my family. His proven behavior and skills are a threat to Martin. As a retired police officer Moos represents and has proven criminal objectives and when challenged, he will attack. I will move my family from Las Vegas, NV to protect them and myself. \$40,000.00
- E. Punitive Damages – for three to four years I have not been able to afford my family a good lifestyle. I have prepared them for the event that I may go to jail for 1 year minimum. I told my ex-wife to find another provider to make sure Rachael our daughter gets through college.  
\$100,000.00.