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CC-41-2025-C-328
Raleigh County Circuit Clerk
Brianne Steele

IN THE CIRCUIT COURT OF RALEIGH COUNTY, WEST VIRGINIA

CHRISTOPHER ADAM JACKSON,

Plaintiff,

v.

ALAN DAVID ABRAMS,

Defendant.

Civil Action No. 25-C-328
Judge Poling

DEFENDANT'S RESPONSE TO PLAINTIFF'S COMPREHENSIVE NOTICE TO THE COURT OF A COORDINATED SCHEME TO DEFRAUD THE JUDICIARY AND OBSTRUCT JUSTICE

COMES NOW the Defendant, Alan David Abrams, with his Response to Plaintiff's Comprehensive Notice to the Court of a Coordinated Scheme to Defraud the Judiciary and Obstruct Justice, stating as follows:

1. The justification for the consent from his former counsel to a mental health evaluation of the Plaintiff should be abundantly clear from his series of pleadings, culminating in the most recent.

2. The idea that a threatened lemon law action prompted a conspiracy among multiple parties, including a magistrate, local law enforcement, creditors, a car dealership, a bank, an insurance company, the Defendant, the Defendant's daughter, and the Plaintiff's brother, speaks for itself.

3. Car dealerships do not obtain domestic violence protective orders; domestic partners do, and the affiliation of that domestic partner with a local car dealership is irrelevant.

4. As with many of his other filings, the Plaintiff's most recent filing casts considerable doubt on his assertions of indigency:

I. Lost Business Revenue

Your inability to operate your businesses due to vehicle failure, personal injury, incarceration, and a court-imposed driving ban has resulted in catastrophic income loss.

- **Lost Revenue from Contracting Business:**
  - The six-month driving ban, which prevents you from operating essential commercial vehicles (dump truck, excavator), has caused documented losses of at least **$200,000.00**.

- **Lost Revenue from Amplius Holdings LLC (Airbnb):**
  - Missed bookings during your incarceration and recovery period have resulted in losses exceeding **$80,000.00**.

IV. Property and Asset Losses Due to Incarceration

Your incarceration led to a lapse in business insurance, leaving your properties vulnerable to burglaries and extensive damage.

- **Carbon 304 Wood & Metal Works**: Documented loss of tools, equipment, and materials, plus premises damage, totaling **$106,000.00**.

- **Airbnb Properties - Damage & Replacement Costs:**
  - Repairs and replacement of six televisions, computers, tools, and structural damage from copper theft: **$9,467.00**.

V. Summary of Quantifiable Damages (Revised)

The following table provides a comprehensive estimate of your direct economic losses to date:

Damage Category	Amount
Lost Contracting Revenue	$200,000.00+
Medical Expenses	$200,000.00+
Uninsured Property & Asset Losses (Wood/Metal Works)	$106,000.00
Lost Airbnb Revenue	$80,000.00+
Airbnb Property Damage & Replacement	$9,467.00
Legal & Investigative Fees (to date)	$16,500.00+
Payment for Failed Repairs	$7,008.26

5. According to his chronology, the Plaintiff was incarcerated for only four months beginning in May, but allegedly lost $280,000, paid out about $33,000 in expenses and fees, and yet has "zero" income.

6. The solution to resolving these discrepancies is simple—compel the Plaintiff to produce his personal and LLC's federal and state tax returns for the past two (2) years during which he received SSI benefits and his LLC's depository account statements from January 1, 2025, through the present.

7. If he ever proceeds with his alleged damages claims, he will be required to produce those financial records in that litigation, and there is good cause to accelerate that obligation at this point in light of the damages allegations the Plaintiff is presently asserting.

WHEREFORE, the Defendant, Alan David Abrams, respectfully requests this Court DENY the Plaintiff's Comprehensive Notice to the Court of a Coordinated Scheme to Defraud the Judiciary and Obstruct Justice, and ORDER the Plaintiff to produce his personal and LLC's federal and state tax returns for the past two (2) years during which he received SSI benefits and his LLC's depository account statements from January 1, 2025, through the present.

ALAN DAVID ABRAMS

By Counsel

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