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BIVENS + § 1985(3) CONSPIRACY COMPLAINT · MASTER TEMPLATE

US District Court · Middle District of Florida · Tampa Division

(Parallel filings in District of Columbia, Eastern District of Virginia, and any district where a named federal Defendant resides or transacts business)

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

Case No.: _____

FRANCESCO GIOVANNI LONGO, in his own right and as Trustee of the **CANADIAN PEOPLE’S TRUST v2**,

Plaintiff,

v.

GLENN DUTTON, individually and in his capacity as former Special Agent, United States Drug Enforcement Administration;

WILLIAM LINTZ, individually and in his capacity as former Supervisory Special Agent, United States Drug Enforcement Administration;

MARK O'BRIAN, individually and in his capacity as former Assistant United States Attorney, Middle District of Florida;

"PRESTON" (given name to be determined by FOIA / Privacy Act production), individually and in his capacity as senior handler within the United States Department of Justice / Drug Enforcement Administration;

JUDGE "KABAKOVICH," JOHN DOE judicial signatory whose identity is forensically contested and whose signature appears on the purported 78-month extradition order dated [DATE];

JOHN DOES 1–2, individually and in their capacities as Deputy United States Marshals participating in the custodial transfer of the Plaintiff in or about 2005;

JOHN DOE FBI-1, individually and in his capacity as a Special Agent or Analyst of the Federal Bureau of Investigation responsible for the Plaintiff's FBI number 674-928-AC1 and for its 2004–2026 maintenance;

RICHARD MacCHEYNE, individually and in his former capacity as a Detective of the Toronto Police Service, sued here for cross-border coordinated conduct occurring substantially on US soil;

Defendants.

COMPLAINT FOR DAMAGES AND DECLARATORY RELIEF

(Bivens · 42 U.S.C. §§ 1985(3), 1986 · Declaratory Judgment Act · Demand for Jury Trial)

Plaintiff **Francesco Giovanni Longo**, by himself and as Trustee of the Canadian People's Trust v2, alleges as follows:

I. JURISDICTION AND VENUE

1. This is an action for damages and declaratory relief for grave and continuing violations of the Plaintiff's rights secured by the **Fourth, Fifth, Sixth, Eighth, and Fourteenth Amendments** to the Constitution of the United States, and by **42 U.S.C. §§ 1985(3) and 1986**, committed by the Defendants while acting under color of federal law.
2. This Court has federal-question subject-matter jurisdiction under **28 U.S.C. § 1331** (civil rights / federal question), **28 U.S.C. § 1343(a)(3)–(4)** (civil rights conspiracies), and supplemental jurisdiction under **28 U.S.C. § 1367** over any state-law claims arising out of the same case or controversy.
3. The Court is authorized to grant declaratory relief under **28 U.S.C. §§ 2201–2202** (Declaratory Judgment Act).
4. **Venue is proper in the Middle District of Florida under 28 U.S.C. § 1391(b)** because a substantial part of the events or omissions giving rise to the claims occurred in this District (the 2004 Billy Womack lab flip in Lakeland, Polk County, within this District; the 2005 indictment paperwork advanced out of this District's US Attorney's Office; the staged mugshot and informant management here; and the ongoing residence of Defendants Dutton and Lintz in Loxahatchee Groves, Palm Beach County, Florida — within the Southern District of Florida for residential purposes but within this District for

conduct purposes, with the Plaintiff reserving the right to file a parallel Complaint in the Southern District of Florida to secure personal-residence venue).

5. Parallel Complaints will be filed, without abandoning this primary action, in: (a) the **District of Columbia** (DOJ and DEA Headquarters); (b) the **Eastern District of Virginia** (US Marshals Service HQ and FBI-affiliated addresses); and (c) the **Southern District of Florida** (residence of Defendants Dutton and Lintz). The three parallel actions will be subject to a contemplated **JPML motion for consolidation** under **28 U.S.C. § 1407**.
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II. PARTIES

6. **Plaintiff Francesco Giovanni Longo** is a natural person, a citizen of Canada, born 24 April 1972, and at all material times resident in Windsor, Ontario, Canada. Mr. Longo is the victim of a cross-border, multi-decade state-sponsored operation particularized below and documented in the Sovereign Archive publicly mirrored at canadianpeoplestrust.pages.dev.
7. **Plaintiff Canadian People’s Trust v2** is a public-benefit trust of which Francesco Giovanni Longo is the Trustee and the intended beneficiaries are persons wrongfully convicted by the Canadian and United States criminal-justice systems. 100 % of any monetary recovery in this action is contractually assigned to the Trust.
8. **Defendant Glenn Dutton** was at all material times from approximately 2003 through 2014 a **Special Agent of the United States Drug Enforcement Administration**. He is sued in his individual capacity for conduct under color of federal law. His current address of record is believed to be in Loxahatchee Groves, Palm Beach County, Florida.
9. **Defendant William Lintz** was at all material times from approximately 2003 through 2015 a **Supervisory Special Agent of the United States Drug Enforcement Administration**, with documented intelligence-sharing responsibilities across the Five Eyes partnership. He is sued in his individual capacity. His current address is believed to be in Loxahatchee Groves, Palm Beach County, Florida (i.e., in close geographic proximity to Defendant Dutton — see ¶ 31 below).
10. **Defendant Mark O’Brian** was at all material times in or about 2005 an **Assistant United States Attorney** for the Middle District of Florida. He is sued in his individual capacity for conduct falling outside the absolute-immunity umbrella of *Imbler v. Pachtman*, 424 U.S. 409 (1976), in particular fabrication-of-evidence and investigative-role conduct that is not “advocacy” under *Buckley v. Fitzsimmons*, 509 U.S. 259 (1993).
11. **Defendant “Preston”** (given name to be determined by FOIA / Privacy Act request and by court-ordered disclosure) was at all material times a senior DOJ / DEA operational handler whose supervisory conduct is particularized in Exhibit 04G of the Sovereign Archive.
12. **Defendant Judge “Kabakovich”** is a John Doe judicial signatory whose handwriting appears on the purported 78-month extradition order. The Plaintiff’s forensic position, particularized at Exhibit 04F, is that no genuine Article III or Article I judicial officer by this name actually signed the order in question, and that the name itself is a fabrication used to advance a fraudulent extradition. The Plaintiff therefore sues this Defendant (i) under his or her true name if any Article III or Article I judge is ultimately identified; or (ii) as a co-conspirator John Doe if the name is wholly fabricated.

13. **Defendants John Does USM-1 and USM-2** are Deputy US Marshals who participated in the 2005 custodial transfer of the Plaintiff. They are sued in their individual capacities.
 14. **Defendant John Doe FBI-1** is a Special Agent or Analyst of the FBI responsible for the maintenance of the Plaintiff's FBI number 674-928-AC1 and related file activity from 2004 to the present. Sued individually.
 15. **Defendant Richard MacCheyne** was at all material times a Detective of the Toronto Police Service, Toronto, Ontario, Canada. Although a Canadian officer, he is sued in this District for conduct that **substantially occurred on US soil** and that was **coordinated with the US federal Defendants** through intelligence-sharing channels — bringing him within the Court's personal jurisdiction pursuant to *Calder v. Jones*, 465 U.S. 783 (1984), and Florida long-arm jurisdiction under **Fla. Stat. § 48.193(1)(a)(2)** (tortious act within Florida) and **§ 48.193(2)** (substantial activity within Florida).
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III. FACTUAL ALLEGATIONS

A. The 2004 Lakeland Ecstasy-Lab Arrest and Informant Flip

16. In or about 2004, Defendant Dutton (then a DEA Special Agent) arrested one **Billy Womack** in connection with an ecstasy laboratory located in Lakeland, Polk County, Florida — **within this District**.
17. Upon information and belief, Dutton thereafter “flipped” Womack into cooperation, using him as the supposed cooperating witness for subsequent prosecutions.
18. Upon information and belief, Dutton and his handler (Defendant Preston) caused **multiple booking photographs of Womack** to be staged in or about 2005 in which Womack is depicted wearing **the same shirt across multiple supposed arrest dates**, the obvious purpose of which was to fabricate a timeline of cooperating-witness arrests usable as corroboration in downstream prosecutions. The detailed forensic analysis of this staging is particularized in Exhibit 04 of the Sovereign Archive.

B. The 2005 Fabricated Longo Indictment

19. On information and belief, in or about 2005 Defendants Dutton, Lintz, and O'Brian caused a grand-jury indictment to issue against the Plaintiff Francesco Giovanni Longo in the Middle District of Florida, and thereafter caused the 78-month “extradition order” purportedly signed by “Judge Kabakovich” to be presented to Canadian authorities in support of the Plaintiff's surrender.
20. The physical impossibility of the conduct pleaded against the Plaintiff in the 2005 indictment is particularized in Exhibit 04F and is summarized here as the **78-month impossibility**: the Plaintiff was in Canadian custody on unrelated matters during the period in which the underlying conduct was alleged to have occurred. No competent prosecutor could have advanced such a charge with reasonable diligence; the advancement was therefore **knowingly false**, constituting fabrication-of-evidence within the meaning of *Manuel v. City of Joliet*, 580 U.S. 357 (2017) and *McDonough v. Smith*, 588 U.S. 109 (2019).
21. On information and belief, Defendant MacCheyne of the Toronto Police Service coordinated with Dutton and Lintz through **Five Eyes intelligence-sharing channels** to supply a **2003 Tampa domestic-violence mugshot** (from a charge that was subsequently expunged) which Dutton and O'Brian then deployed as purported “evidence” against the Plaintiff in the 2005 proceeding. The expunged-record issue is particularized in Exhibit 04C.

22. The arrest warrant itself underlying the 2005 extradition was, on the Plaintiff’s forensic analysis, a **commercial bail-bonds slip** with the case number **hand-written**, signed only by a court clerk rather than an Article III judge — rendering the warrant void *ab initio* under the Fourth Amendment and under *Franks v. Delaware*, 438 U.S. 154 (1978).

C. The Unlawful Custodial Transfer and False Imprisonment

23. On information and belief, Defendants John Does USM-1 and USM-2 thereafter executed the custodial transfer of the Plaintiff into the United States on the basis of the above-pleaded fabricated documents. The transfer occurred with reckless disregard for the facial defects in the warrant and extradition papers, which a reasonable marshal applying the **clearly-established law** of *Malley v. Briggs*, 475 U.S. 335 (1986), would have identified.
24. The Plaintiff was thereafter imprisoned in US federal custody for a period of **approximately six (6) years**, until his 2011 deportation to Canada.

D. The 2026 Active Monitoring and Continuing Tort

25. In early 2026, the Plaintiff published the Sovereign Archive at the domain mirrored at `canadianpeoplestrust.pages`. Within days of publication, the Plaintiff’s canary-token infrastructure registered **coordinated probes from US DOJ federal-network IP subnets, from a static Cogeco residential IP in Windsor, Ontario, and from Hetzner infrastructure in Nürnberg and Helsinki** — particularized in Exhibit 03.
26. On information and belief, Defendants Dutton and Lintz — as admitted private citizens now residing in Loxahatchee Groves, Florida — **personally engaged** in some portion of this real-time monitoring of the Plaintiff’s evidentiary publications, giving rise to independent ongoing-tort and continuing-conspiracy claims that restart the applicable limitations periods. See *Heard v. Sheahan*, 253 F.3d 316 (7th Cir. 2001); *Scherer v. Balkema*, 840 F.2d 437 (7th Cir. 1988) (continuing-violation doctrine in civil-rights actions).
27. On information and belief, the continuing-tort conduct of the Defendants is part of a coordinated program to suppress the Plaintiff’s publicly filed evidence of their own misconduct, and the Defendants are each **knowingly using** federal pension, pay, and/or computing resources — or Five Eyes intelligence infrastructure — to do so.

IV. CAUSES OF ACTION

COUNT ONE — BIVENS / FOURTH AMENDMENT (UNREASONABLE SEIZURE)

(Against Dutton, Lintz, O’Brian, Preston, Kabakovich John Doe, USM John Does 1–2, FBI John Doe-1)

28. The Plaintiff repeats and realleges paragraphs 1 through 27 as if set forth in full.
29. Defendants, acting individually and in concert, caused the Plaintiff to be **seized** (arrested, extradited, and imprisoned) on the basis of **knowingly fabricated evidence** and **a facially invalid warrant**, in violation of the Fourth Amendment. *Bivens v. Six Unknown Named Agents of FBN*, 403 U.S. 388 (1971), continues to recognize a cause of action for unconstitutional seizure by federal officers. *Ziglar v. Abbasi*, 582 U.S. 120 (2017), narrowed but did not eliminate Bivens; the conduct pleaded here —

individual-capacity arrest on fabricated evidence — falls squarely within the core *Bivens* context, not within any “new context” requiring special-factors analysis.

COUNT TWO — BIVENS / FIFTH AMENDMENT (FABRICATION-OF-EVIDENCE / DUE PROCESS)

(Against Dutton, Lintz, O’Brian, Preston)

30. The Plaintiff repeats and realleges paragraphs 1 through 29 as if set forth in full.
31. Defendants knowingly fabricated evidence, including staged mugshots and false cooperating-witness statements, and used that fabricated evidence to procure the Plaintiff’s indictment and extradition. A reasonable prosecutor and agent under *McDonough v. Smith*, 588 U.S. 109 (2019), would have known that such conduct violates the Due Process Clause.

COUNT THREE — CONSPIRACY TO DEPRIVE CIVIL RIGHTS (42 U.S.C. § 1985(3))

(Against all Defendants)

32. The Plaintiff repeats and realleges paragraphs 1 through 31 as if set forth in full.
33. Defendants entered into a **conspiracy**, motivated by **class-based animus** (targeting the Plaintiff as a Canadian of Italian ethnic origin in the context of a cross-border narcotics prosecution) or alternatively as members of a class of persons falling within the protected categories recognized by *Kush v. Rutledge*, 460 U.S. 719 (1983), **for the purpose of depriving the Plaintiff of equal protection of the laws**, and each Defendant committed one or more overt acts in furtherance of the conspiracy as pleaded above.
34. The Plaintiff was thereby injured in person and property.

COUNT FOUR — NEGLECT TO PREVENT CONSPIRACY (42 U.S.C. § 1986)

(Against all Defendants)

35. The Plaintiff repeats and realleges paragraphs 1 through 34 as if set forth in full.
36. Each Defendant had **actual knowledge** of the § 1985(3) conspiracy particularized in Count Three, had **power to prevent or aid in preventing** the commission of the wrongful acts, and **neglected or refused to do so**.

COUNT FIVE — BIVENS / EIGHTH AMENDMENT (CRUEL AND UNUSUAL PUNISHMENT)

(Against all Defendants)

37. The Plaintiff repeats and realleges paragraphs 1 through 36 as if set forth in full.
38. The imposition of **six years of federal imprisonment** on the basis of a facially void warrant and fabricated evidence constitutes cruel and unusual punishment, being wholly disproportionate to any conduct actually committed by the Plaintiff.

COUNT SIX — DECLARATORY JUDGMENT

(Against all Defendants)

39. The Plaintiff repeats and realleges paragraphs 1 through 38 as if set forth in full.

40. The Plaintiff seeks a **declaratory judgment**, pursuant to 28 U.S.C. § 2201, that:
- (a) the 2005 indictment and extradition proceedings against the Plaintiff were procured by fabrication and were void *ab initio*;
 - (b) the purported 78-month extradition order identified as signed by “Judge Kabakovich” is a forensically invalid instrument; and
 - (c) the Plaintiff’s FBI record under number 674-928-AC1, to the extent it reflects the fabricated conduct pleaded above, is to be **expunged** pursuant to the inherent equitable authority of this Court.
-

V. DAMAGES

41. As a direct and proximate result of the Defendants’ wrongful conduct, the Plaintiff has suffered and will continue to suffer:
- (a) general damages for pain, suffering, mental anguish, and loss of liberty during 6 years of unlawful US federal imprisonment;
 - (b) special damages for loss of income, loss of professional opportunities, and expenses incurred in resisting and undoing the fabrication;
 - (c) aggravated and punitive damages reflecting the **deliberate, multi-decade, cross-border character** of the conspiracy and the personal, post-retirement continuing tort;
 - (d) costs and attorney’s fees (to the extent recoverable under **42 U.S.C. § 1988** in respect of the § 1985(3) / § 1986 counts).
-

VI. PRAYER FOR RELIEF

WHEREFORE, the Plaintiff respectfully prays for:

- (i) a judgment against each Defendant, jointly and severally for compensatory damages and individually for punitive damages, in an aggregate amount of not less than **USD \$18,900,000,000,000** (eighteen-point-nine trillion United States dollars), mirroring the principal quantum defaulted in the parallel Canadian proceedings (Ontario Superior Court of Justice and Supreme Court of Canada) and itemised in the attached **Exhibit 10 · Damages Schedule Master Worksheet**, with the Dec 26, 2025 accepted Canadian interim sum of CAD 57,650,000 treated as partial satisfaction, not as ceiling; 100 % of any recovery is allocated by contract to the **Canadian People’s Trust v2**, with the Plaintiff recovering zero;
- (ii) an additional award of punitive damages against each Defendant in such amount as this Court and a jury deem just;
- (iii) treble damages where available by statute;
- (iv) costs and reasonable attorney’s fees under 42 U.S.C. § 1988;
- (v) the declaratory relief set out in Count Six;
- (vi) ancillary relief in the form of a **Writ of Execution and Temporary Restraining Order** under Fed. R. Civ. P. 65 and the All Writs Act, 28 U.S.C. § 1651(a), freezing the Defendants’ US-situated assets

pending final disposition — in aid of the parallel Canadian Mareva injunction sought in the Ontario Superior Court of Justice and reciprocal enforcement under the Florida *Uniform Foreign-Country Money Judgments Recognition Act*, Fla. Stat. §§ 55.601 et seq.;

(vii) such further and other relief as this Honourable Court may deem just and proper.

VII. JURY DEMAND

The Plaintiff hereby demands trial by jury on all issues so triable under the Seventh Amendment.

VIII. SIGNATURE BLOCK

DATED: -----

Respectfully submitted,

FRANCESCO GIOVANNI LONGO

Plaintiff, in propria persona

c/o canadianpeopletrust.com

Email (service of record):

flongo11@gmail.com

[VPN-created alt email filed separately under seal]

Windsor, Ontario, Canada

Trust co-claimant: Canadian People's Trust v2

100 % assignee of monetary recovery

Pro-hac-vice US-admitted counsel to be retained post-filing;

Plaintiff reserves the right to amend to name counsel upon retainer.

IX. EXHIBITS INCORPORATED BY REFERENCE

- **Exhibit 00** — *Ab Initio Master Brief*
- **Exhibit 03** — *Feb 21–23 Mass-Blast Suppression & Canary Receipts (2026 ongoing tort)*
- **Exhibit 04** — *Dutton Origin Story: 2004 Womack Flip*
- **Exhibit 04A** — *Custody Warrant Signatures*
- **Exhibit 04B** — *Ducharme Forgery & Judge Shopping*

- **Exhibit 04C** — *MacCheyne Expunged Mugshot / Bail-Bonds Warrant / Lintz Five-Eyes*
- **Exhibit 04D** — *Ogus Forensic Dissection*
- **Exhibit 04E** — *Pollock, Ducharme, LAO, Gibson*
- **Exhibit 04F** — *O’Brian, Kabakovich, 78-month Impossibility*
- **Exhibit 04G** — *Toews, Preston, Downey — Chain of Command*
- **Exhibit 04H** — *LSO Regulatory Capture / Dissolution Study*
- **Exhibit 09** — *2021 Windsor Unlawful Arrest & Retroactive Charge Fabrication*
- **Sovereign Archive Public Mirror** — <https://canadianpeoplestrust.pages.dev>

X. NOTES FOR PARALLEL / ADAPTED FILINGS

Parallel filing	Venue adjustment	Lead Defendants for that filing
District of Columbia (Washington, DC)	Change heading to USDC-DDC; remove MDL venue paragraph; add § 1391(e)(1)(B) venue (agency defendant residing in DC)	DOJ institutional / DEA HQ / Preston
Eastern District of Virginia (Alexandria)	Change heading to USDC-EDVA; § 1391(b)(1) venue by residence of USMS HQ (Arlington) and FBI Quantico	USM John Does 1–2, FBI John Doe-1, Lintz (via DEA HQ proximity)
Southern District of Florida (West Palm Beach)	Change heading to USDC-SDFL; § 1391(b)(1) venue by personal residence	Dutton, Lintz (Loxahatchee Groves residence)
MDL alternate division	If reassigned to another MDL division (Ft. Myers, Orlando, Jacksonville, Ocala) — template remains valid	—

All four parallel Complaints will be filed by the Plaintiff **substantially simultaneously**, accompanied by a JPML § 1407 multi-district-litigation motion for coordination before the Middle District of Florida as the originating District.

Master template · version 1.0 · drafted 2026-04-23

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