

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 09 CV 00309 MSK-KMT

**SUZANNE SHELL
Plaintiff**

v.

AMERICAN FAMILY RIGHTS ASSOCIATION, et al.

**OBJECTION TO PLAINTIFF'S EMERGENCY MOTION TO SEAL DOCUMENTS
#203 AND FOR PROTECTIVE ORDER**

COMES NOW, Defendant Dee Contreras and objects to Plaintiff's Emergency Motion to Seal Documents and for Protective Order, and in support of said objection states as follows:

Defendant has standing to object to this Motion because it has the potential to deprive all defendants of legal remedies due each and every one of them who has been falsely accused by Ms. Shell of doing exactly what these documents prove Ms. Shell herself is guilty of.

The attachments to Defendant Swallow's Reply to Ms. Shell's Response to the Motion to Dismiss filed by Ms. Swallow are NOT trade secrets. They are evidence that Ms. Shell has engaged in a long-standing effort to deprive AFRA and many of the defendants to this lawsuit of the respect they deserve for their efforts in helping families navigate a very difficult system in a time of desperation. They are evidence that Ms. Shell has perfected a method of anti-trust and wrongful methods of pushing AFRA out of the way so that she can fix the price for family advocacy services and create a monopoly for herself. They are evidence that Ms. Shell has a vendetta against those who are involved in advocacy efforts who she feels are depriving her of a living she believes she could earn from the misery of broken families and broken lives by

destroying the reputations of those who are giving freely of themselves—who have the courage to try to change the things they can without thinking of their own pocket books.

These documents allude only to the fact that the Plaintiff and her co-horts had multiple copies of paperwork containing trade secrets—but do not reveal the trade secrets themselves—which they were handing out as loaner copies to other advocates and clients. These so called trade secrets were also sold to the public, to attorneys and supposedly to judges and child protection workers as well in the form of seminars for use in their practices.

Trade secrets are NOT the same as copyrights. Once you hand out that first page of information to the public as a “loaner” or sell it to the public for their own use in their own practice, those trade secrets are no longer protected. However, it is not trade secrets that were divulged amongst these documents. It is evidence of criminal activities that Ms. Shell is requesting be protected.

It is the duty of this court to make sure that evidence of criminal activities is preserved, and that justice is eventually served. Defendant Dee Contreras respectfully requests that this Court preserve this evidence and allow those who have been wronged by Ms. Shell’s fraudulent practices, her anti-trust activities, her false and misleading statements, and the libelous, slanderous false accusations, and defamation of character against these defendants, including Dee Contreras, be kept open and available for the use of the defendants so that justice can be served.

RESPECTFULLY SUBMITTED,

B. Dee Contreras

Certificate of Service

I hereby certify that on the 7th day of July, 2009, I served a true and correct copy of this Objection to Plaintiff's Emergency Motion to Seal Documents and for Protective Order:

AFRA – via e-mail to William O. Tower	William O. Tower – via e-mail
Leonard Henderson – via e-mail	Susan Adams Jackson – via e-mail
Cletus Kiefer – PO Box 52, St. Charles, MO 63301	Families at Risk Defense Alliance – via United States Mail to PO Box 52, St. Charles, MO 63301
Francine Renee Cygan – 329 Cornell Ave., Apt. D, Villa Park, IL 60181	Mark Cygan – 329 Cornell Ave., Apt. D, Villa Park, IL 60181
Illinois Family Advocacy Coalition – c/o Renee Cygan	Dorothy Kernaghan-Baez – via e-mail
Georgia Family Rights, Inc. – via e-mail	Dennis Hinger – via e-mail
National Association of Family Advocates via e-mail	Aimee Dutkiewicz – 40 Landry St., #2, Bristol, CT 06010
Thomas Dutkiewicz – by e-mail	Connecticut DCF Watch – by e-mail
William Wiseman – via e-mail	Wiseman Studios – via e-mail
Ann Durand – via e-mail	Brenda Swallow – via e-mail
Kathy Tilley – 800 Gibson Dr., #322, Roseville, CA 95676	Randall Blair – via e-mail
Lloyd Phillips – 14220 SW 29 Court, Ft. Lauderdale, FL 33330	Ringo Kamens – via e-mail
Cheryl Barnes – via e-mail to Daniel Slater, Esq.	CPS Watch, Inc. – via e-mail
Desere' Clabo aka Howard – via e-mail to Daniel Slater, Esq.	Sarah Thompson – via e-mail to Daniel Slater, Esq.

and upon the Plaintiff, Suzanne Shell, via U.S. Mail (also she receives a copy through PACER:

Suzanne Shell
14053 Eastonville Rd.
Elbert, CO 80106

Dated: July 7, 2009

B. Dee Contreras

Defendant:
B. Dee Contreras
10571 Colorado Blvd., Apt. B-101
Thornton, CO 80233