

United States District Court

for the

District of Maryland

Rcv'd by:

Anthony Edwin Hurley

(Plaintiff(s))

V.

Civil Action No. 23-w-2494-GLR

Alberto Medina Lopez

(Defendant(s))

MOTION

Comes now the Plaintiff, pro se, in the above-entitled case filing this Motion For Leave to File an Amended Complaint to include Plaintiff's spouse, Mary E. Hicklin-Hurley for the reasons as follows:

1. The Defendant has recently demonstrated the same egregious fraudulent behavior towards the Plaintiff's spouse as exhibited towards the Plaintiff.
2. Accordingly, it is more effective to seek one ruling that will remedy the Defendant's behavior ordering that said behavior against both the Plaintiff and the Plaintiff's spouse cease and desist.
3. For the foregoing reasons this Motion for Leave to File the proposed Amended Complaint is sought and a copy of the Amended Complaint is attached hereto.

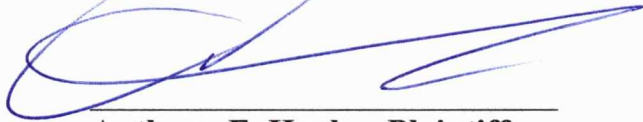
Respectfully submitted,

Anthony E. Hurley, Plaintiff

Date _____

Certificate of Service

I, Anthony E. Hurley, Plaintiff, do hereby declare under penalty of perjury that on Tuesday, April 23, 2024, a copy of the foregoing Motion was sent via 1st class mail with a certificate of mailing to Alberto Medina Lopez, the Defendant, at P.O. Box 6596, Woodbridge, Prince William County, Virginia 22195-6596



Anthony E. Hurley, Plaintiff

4/23/24
Date

HD

United States District Court

Rcv'd by: AN

for the

District of Maryland

Anthony Edwin Hurley
And
Mary E. Hicklin-Hurley

(Plaintiff(s))

v.

Civil Action No. 23-w-2494-GLR

Alberto Medina Lopez

(Defendant(s))

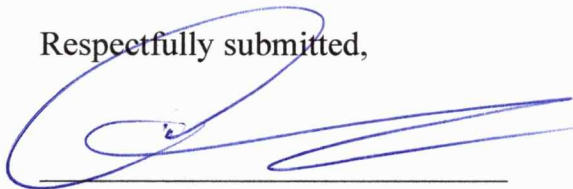
PROPOSED AMENDMENT TO COMPLAINT

Comes now the Plaintiff, pro se, in the above-entitled case filing this proposed amendment to Complaint to include Plaintiff's spouse, Mary E. Hicklin-Hurley for the reasons as follows:

1. The Defendant has filed fraudulent 1099's against my spouse since 2011 and continues to file these egregious 1099 statements with the IRS as recently as 2023.
2. The 2023-1099 filed with the IRS by the Defendant falsely states income paid by the Defendant to my spouse in the amount of \$9,999,888,777; \$99,888,777; and \$3,999,988,877.70. See attached.
3. For the foregoing reasons stated in Plaintiff's Motion for Summary Judgment and Plaintiff's Brief in Opposition to the Defendant's Motion for Summary Judgment filed, Plaintiff hereby motions this court to add Plaintiff's spouse to the original complaint and all filings made by Plaintiff in the above-entitled case.
4. Accordingly the Plaintiffs motion this court for Summary Judgment based on the Plaintiffs identifying the fraudulent 1099's filed with the IRS by the Defendant and there is no genuine dispute as to any material fact unless the Defendant can provide evidence to support the purported earnings paid by the Defendant to the Plaintiffs.

5. Whereby for reasons stated the Plaintiffs motion this court for summary judgment in favor of the Plaintiffs for \$3,500,000.00 for Plaintiff #1, and \$3,500,000.00 for Plaintiff #2 for punitive damages against the Defendant and a Cease-and-Desist Order against the Defendant requiring that his egregious behavior cease forthwith.

Respectfully submitted,



Anthony E. Hurley, Plaintiff

4/23/24
Date



Mary E. Hicklin-Hurley, Plaintiff

4/23/24
Date

Certificate of Service

I, Anthony E. Hurley, Plaintiff, and Mary E. Hicklin-Hurley, Plaintiff, do hereby declare under penalty of perjury that on Tuesday, April 22 2024, a copy of the foregoing Brief was sent via 1st class mail with a certificate of mailing to Alberto Medina Lopez, the Defendant, at P.O. Box 6596, Woodbridge, Prince William County, Virginia 22195-6596



Anthony E. Hurley, Plaintiff

4/23/24
Date



Mary E. Hicklin-Hurley, Plaintiff

4/23/24
Date

ALBERTO MEDINA
PO BOX 6596
WOODBIDGE, VA 22195
US

ZEC0130A
3000000112 00.0000.0002 112/1



MARY E HICKLIN
1401 SHEFFORD RD
BALTIMORE M D 2123-9143

☐ CORRECTED (if checked)

PAYER'S name, street address, city or town, state or province, country, ZIP or foreign postal code, and telephone no. ALBERTO MEDINA PO BOX 6596 WOODBIDGE, VA 22195 US Phone: 157-121-00874		1 Rents \$ 0.00	OMB No. 1545-0115 Form 1099-MISC (Rev. January 2022) For calendar year 2023
		2 Royalties \$ 0.00	
PAYER'S TIN 583-29-1032	RECIPIENT'S TIN XXXXX6669	5 Fishing boat proceeds \$ 0.00	6 Medical and health care payments \$ 0.00
RECIPIENT'S name, street address (including apt. no.), city or town, state or province, country, and ZIP or foreign postal code MARY E HICKLIN 1401 SHEFFORD RD BALTIMORE, M D 2123-9143 US		7 Payer made direct sales totaling \$5,000 or more of consumer products to recipient for resale <input type="checkbox"/>	8 Substitute payments in lieu of dividends or interest \$ 0.00
		9 Crop insurance proceeds \$ 0.00	10 Gross proceeds paid to an attorney \$ 0.00
		11 Fish purchased for resale \$ 0.00	12 Section 409A deferrals \$ 0.00

**Miscellaneous
Information**

**Copy B
For Recipient**

This is important tax information and is being furnished to the IRS. If you are required to file a return, a negligence penalty or other sanction may be imposed on you if this income is taxable and the IRS determines that it

ALBERTO
MEDINA
PO BOX 6596
WOODBIDGE, VA 22195

027720

C1656 1of1 T68 B126 P2

MARY HICKLIN

1401 SHEFFORD RD

BALTIMORE, MD 21239-1435



☐ CORRECTED (if checked)

PAYER'S name, street address, city or town, state or province, country, ZIP or foreign postal code, and telephone no. ALBERTO MEDINA PO BOX 6596 WOODBIDGE, VA 22195 (571) 210-0874		1 Rents \$	2 Royalties \$	OMB No. 1545-0115 Form 1099-MISC (Rev. January 2022) For calendar year 20 23
PAYER'S TIN 583-29-1032		3 Other income \$ 9,999,888,777.00	4 Federal income tax withheld \$	Miscellaneous Information Copy B For Recipient This is important tax information and is being furnished to the IRS. If you are required to file a return, a negligence penalty or other sanction may be imposed on you if this income is taxable and the IRS determines that it has not been reported.
RECIPIENT'S TIN 213-60-6669		5 Fishing boat proceeds \$	6 Medical and health care payments \$	
RECIPIENT'S name MARY HICKLIN 1401 SHEFFORD RD BALTIMORE, MD 21239-1435		7 Payer made direct sales totaling \$5,000 or more of consumer products to recipient for resale <input type="checkbox"/>	8 Substitute payments in lieu of dividends or interest \$	
		9 Crop insurance proceeds \$	10 Gross proceeds paid to an attorney \$	
		11 Fish purchased for resale \$	12 Section 409A deferrals \$	
Account number (see instructions) PRUSA826ACRESDAMAGES		13 FATCA filing requirement <input type="checkbox"/>	14 Excess golden parachute payments \$	15 Nonqualified deferred compensation \$
		16 State tax withheld \$	17 State/Payer's state no.	18 State income \$

Form 1099-MISC (Rev. 1-2022)

(keep for your records)

www.irs.gov/Form1099MISC

Department of the Treasury - Internal Revenue Service

Instructions for Recipient - 1099-MISC (2023)

Recipient's taxpayer identification number (TIN). For your protection, this form may show

Box 7. If checked, consumer products totaling \$5,000 or more were sold to you for resale, on

ZEC0130B AUTO ALL FOR AADC 212
7000016696 00.0047.0115 16696/1



MARY E HICKLIN
1401 SHEFFORD RD
BALTIMORE MD 21239-1435

☐ CORRECTED (if checked)

PAYER'S name, street address, city or town, state or province, country, ZIP or foreign postal code, and telephone no. ALBERTO MEDINA PO BOX 6596 WOODBIDGE, VA 22195 US Phone: 571-210-0874		1 Rents \$ 0.00	OMB No. 1545-0115 Form 1099-MISC (Rev. January 2022) For calendar year 2023
		2 Royalties \$ 0.00	
PAYER'S TIN 583-29-1032	RECIPIENT'S TIN XXX-XX-6669	5 Fishing boat proceeds \$ 0.00	6 Medical and health care payments \$ 0.00
RECIPIENT'S name, street address (including apt. no.), city or town, state or province, country, and ZIP or foreign postal code MARY E HICKLIN 1401 SHEFFORD RD BALTIMORE, MD 21239 US		7 Payer made direct sales totaling \$5,000 or more of consumer products to recipient for resale <input type="checkbox"/>	8 Substitute payments in lieu of dividends or interest \$ 0.00
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**Miscellaneous
Information**

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This is important tax information and is being furnished to the IRS. If you are required to file a return, a negligence penalty or other sanction may be imposed on you if this income is taxable and the IRS determines that it