

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

ROBERT DAVID STEELE )  
-and- )  
EARTH INTELLIGENCE NETWORK )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
JASON GOODMAN )  
PATRICIA A. NEGRON )  
-and- )  
“QUEEN TUT” )  
 )  
Defendants. )  
\_\_\_\_\_ )

Case 3:17-cv-601-MHL

**PLAINTIFFS’ RESPONSE TO**  
**LETTERS FROM “MERCIA FRANCIS”**  
**(DOCUMENTS 31 and 33)**

Plaintiffs, Robert David Steele and Earth Intelligence Network (“Plaintiffs”), by counsel, file the following Response to Documents 31 and 33 – letters received by the Court from a “*Mercia Francis*”.

1. The Court has now received two (2) letters with no return address putatively signed by a “*Mercia Francis*”. [*Documents 31 and 33*].<sup>1</sup>

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<sup>1</sup> Although Documents 31 and 33 are inadmissible for any purpose because, *inter alia*, they violate Rules 701 (Inadmissible Lay Opinion), 802 (Hearsay) and 901 (Lack of Authentication) of the Federal Rules of Evidence, Plaintiffs wish to address the representations made in these letters. The author(s) is misleading the Court and unreasonably and vexatiously multiplying these proceedings.

**Queen Tut is Susan Lutzke**

2. Document 31 represents that Queen Tut is an 81-year old woman, named Helen Suzanne Ingraham, who allegedly “has recently been diagnosed with dementia”.

3. The author of Document 31 knows there is “currently a civil case pending with Queen Tut, Jason Goodman, & Trish<sup>2</sup> Negron” in this Court. The author knows that Plaintiffs allege that “the character Queen Tut is either a Carla Howell or a Susan Lutzke.” The author acknowledges that it is “important for the court to have the correct identity for Queen Tut.”

4. Defendant, Queen Tut, is Susan A. Lutzke.

5. Defendant’s voice is the distinguishing characteristic of her identity.

6. On July 1, 2017, Fort Collins, Colorado, police shot and killed 19-year old, Jeremy Holmes (“Jeremy”). Police confronted Jeremy after receiving a 911 call at 8:13 p.m. The 911 call begins as follows:

“911 DISPATCH: Dispatch, this is Sherry.

CALLER: Sherry, this is Susan Lutzke. I live at [redacted]. My son, Jeremy, has just left the house and he said he is gonna go kill my other son.

...

DISPATCH: What’s the brother’s name that he’s going to?

CALLER: Alec.

DISPATCH: [Spells] A-l-e-c?

CALLER: Yes.

DISPATCH: And it’s also Holmes?

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<sup>2</sup> The author of the letter knows that Defendant, Patricia A. Negron, goes by the name “Trish” Negron.

CALLER: No, it's Lutzke, [spells] L-u-t-z-k-e."<sup>3</sup>

[\[http://www.9news.com/article/news/local/fort-collins-csu-police-release-body-camera-footage-of-2-shootings/73-493723062\]](http://www.9news.com/article/news/local/fort-collins-csu-police-release-body-camera-footage-of-2-shootings/73-493723062).

7. No expert testimony is required to identify the voice of Queen Tut. A cursory comparison of (a) the voice in the videos at issue in this case and (b) the voice of the 911 caller identifying herself as "Susan Lutzke" demonstrates that the person masquerading as "Queen Tut" is Susan Lutzke.

8. Plaintiffs commenced this action on September 1, 2017.

9. On September 29, 2017, CBS4 Denver (Fort Collins, CO) aired a program entitled, **"Body Cameras: Police Shootings Leave Families With Unanswered Questions"**. The program included the following video about the police shooting of Jeremy:



<sup>3</sup> Alec Chang Lutzke is or was a postdoctoral fellow at Colorado State University ("CSU") doing research that utilizes synthetic design to control therapeutic delivery rates, biodegradation behavior, and mechanical strength of various material platforms. [<http://sites.chem.colostate.edu/reynoldslab/groupmembers.html>].

<http://denver.cbslocal.com/2017/09/29/body-cameras-police-shootings/>]. A woman, who identifies herself as “Sue Holmes”, appears in the video. She identifies Jeremy as her “son”. She tells CBS4 Denver that Jeremy was “mentally ill” and in “crisis” at the time of his death. At 0:33 of the video, she states that “I regret that [911] phone call to this day, okay. I regret I ever made that call.”

Sue Holmes said her son Jeremy was in crisis when she called 911.

“I regret that phone call to this day,” said Holmes, who called police after her son started acting erratically and threatened to kill relatives.



Sue Holmes (credit: CBS)

The voice of “Sue Holmes” is the voice of “Susan Lutzke” and, again, a cursory review of the videos demonstrates the voice is also that of Defendant, Queen Tut.<sup>4</sup>

10. On November 7, 2017, Susan Lutzke a/k/a Susan Holmes appeared at the meeting of the Fort Collins, Colorado, City Council. The meeting was videotaped and recorded and is available on the website of the City of Fort Collins, Colorado.

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<sup>4</sup> Without discovery, it is unclear why Susan Lutzke started calling herself “Sue Holmes” in September 2017. Lutzke may have taken the last name of her fallen son as a tribute or she may have started using “Holmes” in an attempt to hide her identity in the wake of this action.

[<https://fortcollinstv.viebit.com/player.php?hash=6TErbem6SMld#>]. Beginning at 41:53 of the recorded meeting, “Susan Holmes” identifies herself and then proceeds to scream at City Council, angrily stating that her son had been “slaughtered” by the police. She blames the District Attorney for misusing words she had provided at the hospital to “justify the slaughter” of Jeremy.

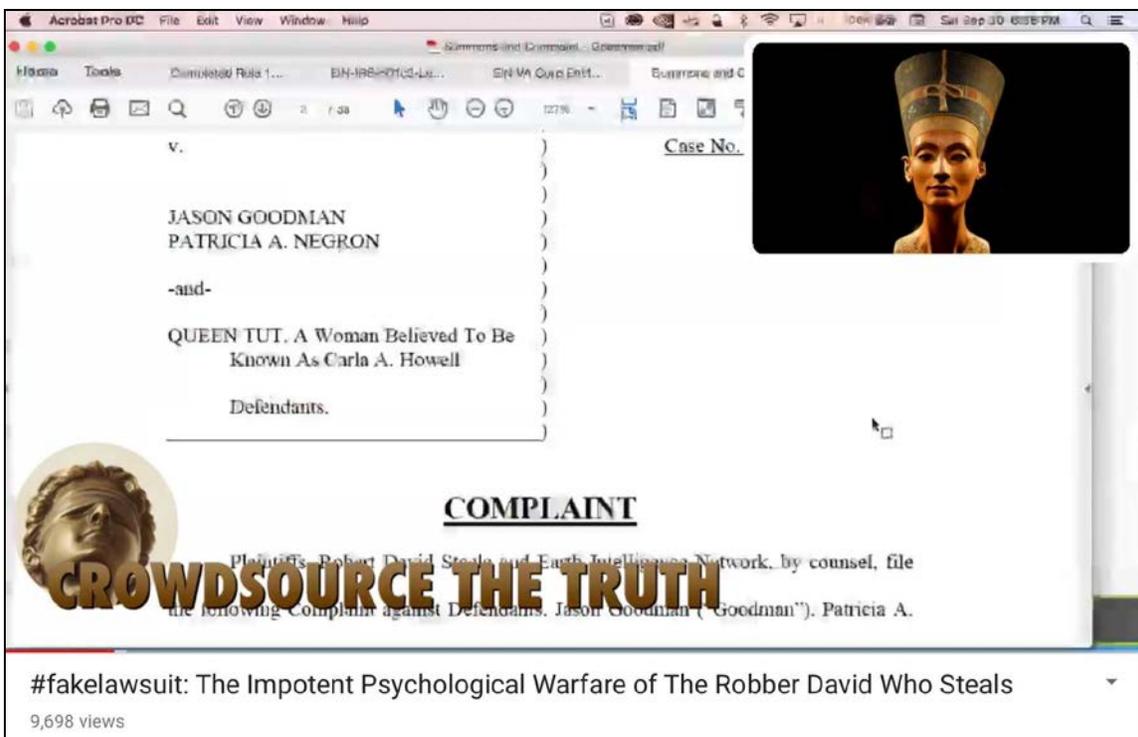


The voice of “Susan Holmes” at the City Council meeting and in the CBS4Denver interview is same voice of “Susan Lutzke” who made the 911 call, and that voice is an identical match to Defendant, Queen Tut.

11. Since the filing of this action, Defendant, Jason Goodman, has published three (3) videos, in which he has positively identified Queen Tut as Susan Lutzke.

a. On September 30, 2017, Goodman published a video entitled, “#fakelawsuit: The Impotent Psychological Warfare of The Robber David Who Steals”. [<https://www.youtube.com/watch?v=kYOikz5mjbw&t=1707s>].

The video prominently features Goodman and Queen Tut talking about this action:



The voice of Queen Tut is unmistakable. Beginning at 13:50 of the video, Goodman and Queen Tut engage in the following exchange:

“GOODMAN: I don’t know that that claim is really, ya, he said it with a straight face, Susie...

QUEEN TUT: Oh, it was a straight face. It was a straight face. It was serious.

GOODMAN: Right. So, he’s got all kinds of claims in his stupid lawsuit here, in his # fake lawsuit. And, everybody can get that trending if you would please, # fake lawsuit from a # real idiot.”

(Emphasis added).

b. On December 27, 2017, Goodman published a video entitled, “**Meme Wars - Are Deceptive Operatives Conducting Psychological Warfare in Plain Sight?**”. [\[https://www.youtube.com/watch?v=8Tdkawt5FNU\]](https://www.youtube.com/watch?v=8Tdkawt5FNU).

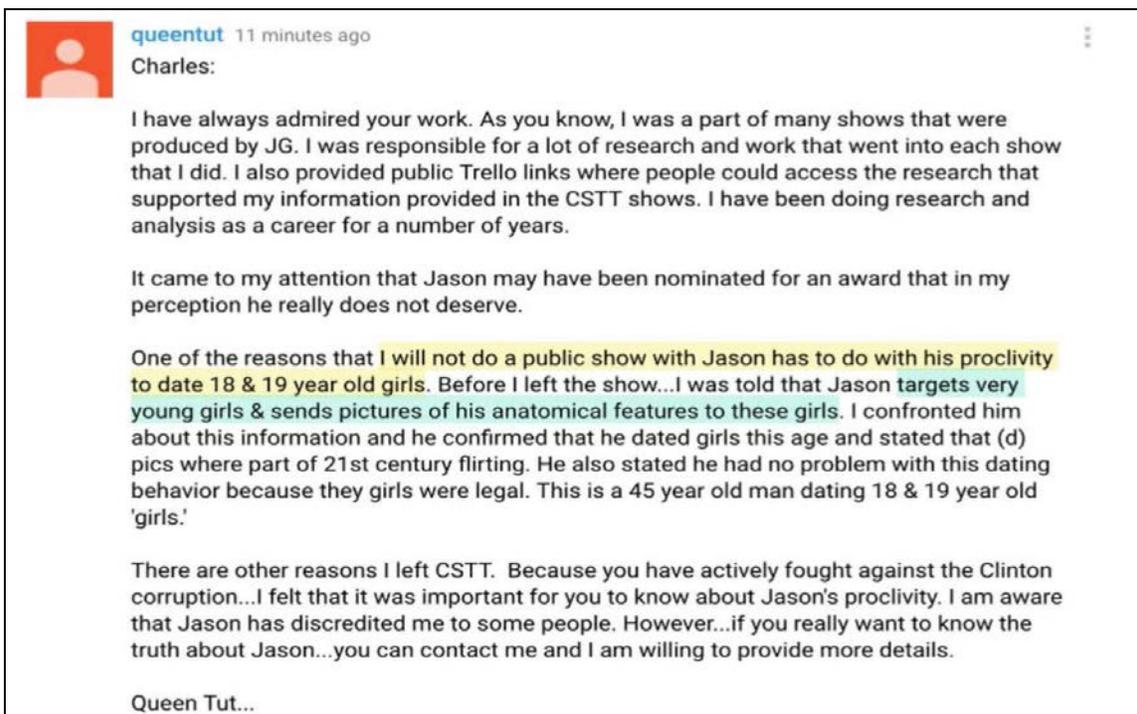
Beginning at 14:03 of the video, Goodman identifies Queen Tut as Susan Lutzke. Goodman states “even if we accuse him of lying about writing the open source

intelligence manual, now that's information that came to me from Queen Tut, a woman who his own lawsuit has revealed to be Susan Lutzke. Okay. Now, people will say I'm doxing<sup>5</sup> Queen Tut. Queen Tut is no longer a source. Queen Tut has revealed herself to be someone who wanted to infiltrate this organization and make false statements on hoax YouTube channels<sup>6</sup> with the specific intent of damaging me." (Emphasis added).

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<sup>5</sup> "Dox" means to publicly identify or publish private information about (someone) especially as a form of punishment or revenge. [<https://www.merriam-webster.com/dictionary/dox>].

<sup>6</sup> On December 27, 2017, the "Hoax Wars" YouTube channel published a video entitled, "**The Queen Tut Tapes #1: Trish Has Spent \$8,000 Defending RDS Lawsuit**". [<https://www.youtube.com/watch?v=h0f036n2Slo>]. During the video, the following comment from Queen Tut was displayed:



Goodman and Lutzke parted company as a result of Lutzke's public comments. On December 25, 2017 at 9:46 p.m., Lutzke created a Twitter account, "@Queentutnaiobi". [<https://twitter.com/queentutnaiobi?lang=en>]. Lutzke now uses Twitter to publish false and defamatory statements about Plaintiffs.

c. On February 23, 2018, Goodman published a video entitled, “Hudson Returns”. [<https://www.youtube.com/watch?v=O2MmaE6Wwtk>]. The video shows a picture of Queen Tut:



At 44:22 of the video, Goodman expressly and unequivocally confirms that Queen Tut is “**Susan Lutzke. Let’s call her who she is**”. (Emphasis added).

12. There is no question that Queen Tut is Susan Lutzke.

13. Documents 31 and 33 are efforts by someone – someone who knows “Trish” Negron and is familiar with this action – to commit fraud on the District Court.

**Queen Tut Is Not An 81-Year Old Women Suffering From Dementia**

14. Contrary to Documents 31 and 33, the evidence also demonstrates that Susan Lutzke does not suffer from dementia. To the contrary, since Plaintiffs filed this action on September 1, 2017, Lutzke has continued to actively defame Plaintiffs both in YouTube videos and on Twitter.

a. YouTube. Since the filing of this action, Lutzke has appeared as “Queen Tut” in no less than five (5) videos in which she has made and false and defamatory statements about Plaintiffs. These videos are:

09/06/2017 – “Crushing Grip of the Deep State”

<https://www.youtube.com/watch?v=Zo3TnUazpGQ&pbjreload=10;>

09/11/2017 – “#Unrig Espionage, Treason and Traitors in Congress”

<https://www.youtube.com/watch?v=Jxh2Qg84QWg;>

09/23/2017 – “Unraveling the Deep State - Conspiracy to Suppress Free Speech”

<https://www.youtube.com/watch?v=Zep-7jk0BLA;>

09/30/2017 – “#fakelawsuit: The Impotent Psychological Warfare of The Robber David Who Steals”

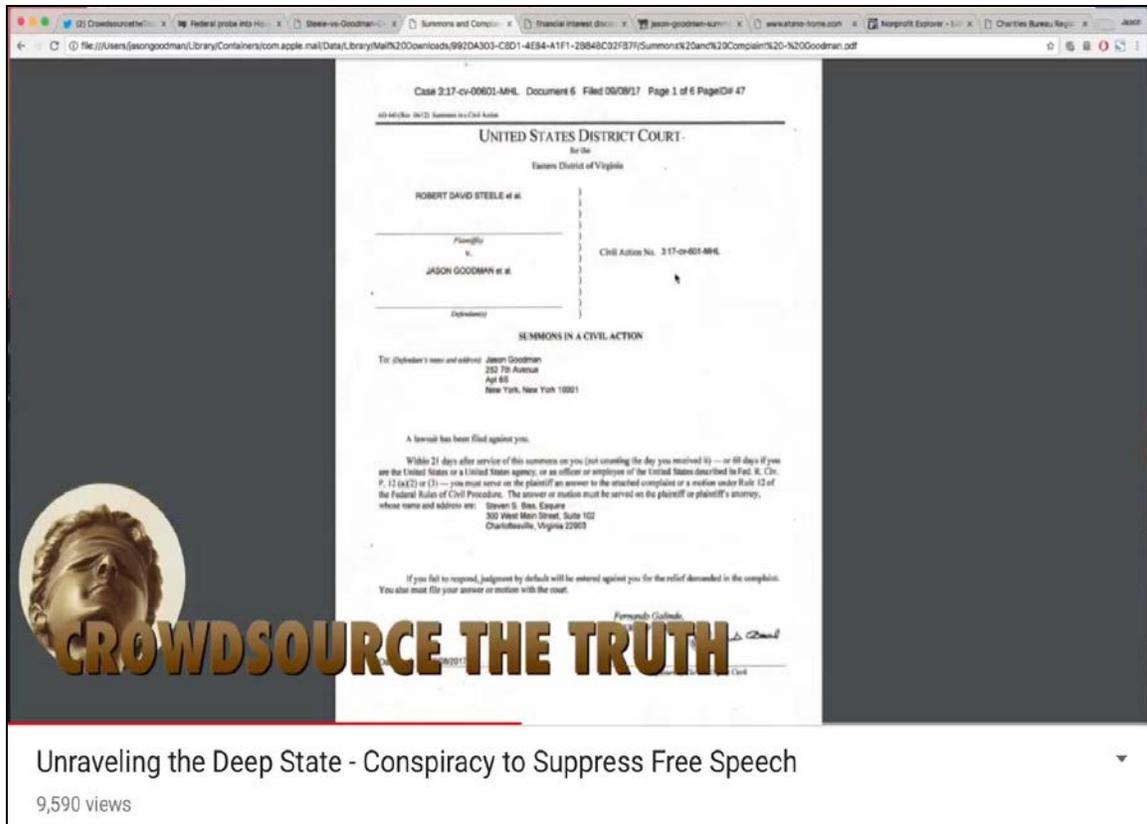
<https://www.youtube.com/watch?v=kYOikz5mjbw&t=49s;>

10/07/2017 – “Bone Thugs and Disharmony: Conspiracy to Silence Truth?”

<https://www.youtube.com/watch?v=YZOCxWlyqBA;>

The Court can plainly see from the YouTube videos that Queen Tut is in full control of all faculties, including her mouth, and she is fully aware of the Plaintiffs’ Complaint and Summons:





b. Twitter. Since December 2017, Susan Lutzke has also engaged in a campaign of defamation on Twitter. Among the false and defamatory statements she has tweeted or retweeted are the following:



Pinned Tweet



**queentut**  
@Queentutnairobi



#rogerstone @TrishaDishes @infowars @jerome\_corsi

Check out the 'hand on the shoulder.' One pic is authentic, the other pic is 'fake.' Why is Robert David Steele using a 'fake' pic of Roger Stone for his UNRIG 2018 funding campaign? [goo.gl/76B8hQ](http://goo.gl/76B8hQ)



5:21 PM · Feb 8, 2018



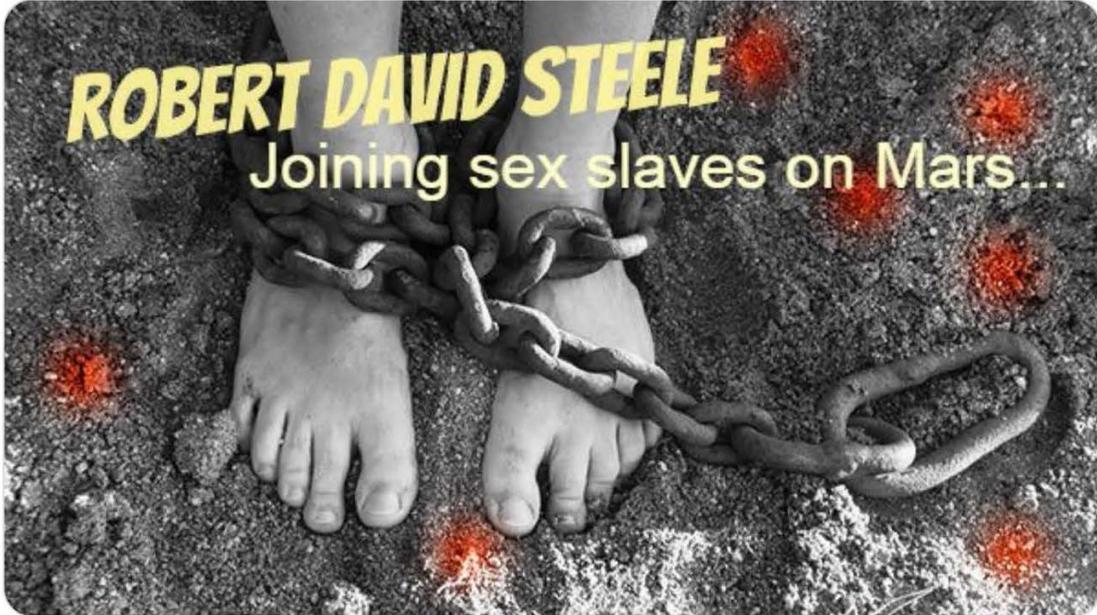
**queentut**  
@Queentutnairobi



Revolution has Started with Trump Surrounded by Liars w/ Robert David Steele... Yep...brought to you by...oops...the greatest plagiarizer and liar on the internet...RDS.

 **queentut**  
@Queentutnairobi

BREAKING NEWS...Robert David Steele will be joining 'sex slaves on Mars' after Queen Tut exposes him in federal court. In a few days the 'fake federal lawsuit' that RDS has been bragging about will come to a crashing halt...Stay tuned!!

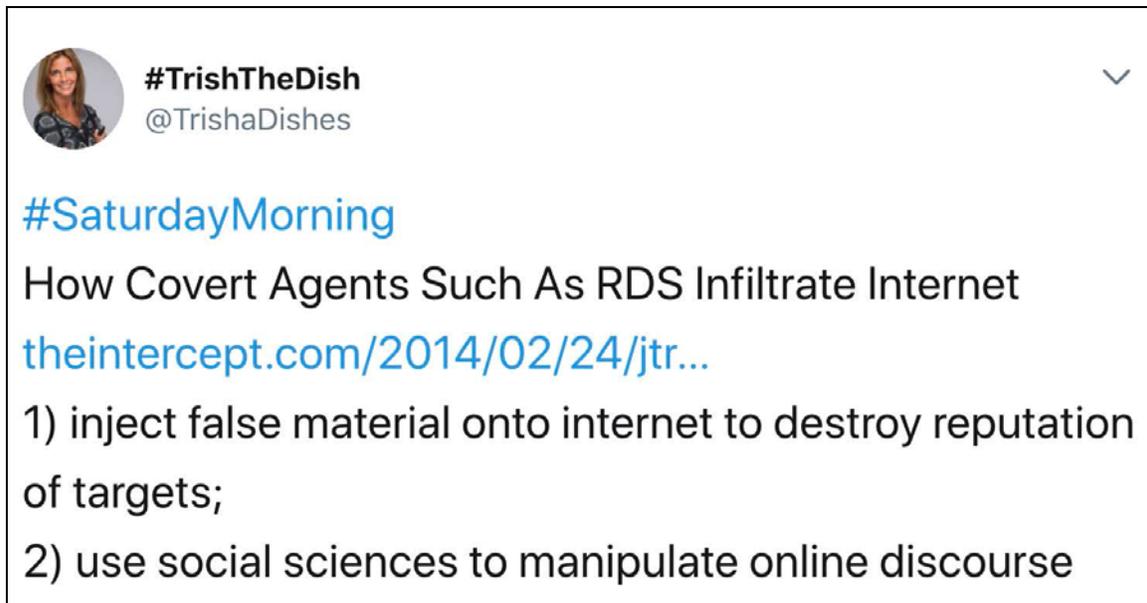


10:06 PM · Feb 20, 2018

 **queentut**  
@Queentutnairobi

In a 'crowd-stalker for cash' scam Robert David Steele is now positioning himself as a front guy for federal law suit filings. Check out his comment at Sara Westalls' site..note the 'We'...

Lutzke is also retweeting statements about Robert David Steele (RDS) published by her co-conspirator, Patricia Negron:



**Susan Lutzke plainly knows how to use social media as a weapon. Contrary to Documents 31 and 33, Lutzke is clearly not suffering from dementia.<sup>7</sup>**

**Susan Lutzke Was Properly Served With Process**

15. Although Document 33 was signed by a “Mercia Francis”, the Court will note that the author begins by stating that in a prior letter “**we** provided Queen Tut’s identity and birth certificate.” (Emphasis added).

16. Documents 31 and 33 are clearly the machination of multiple persons – *i.e.*, “**we**”.

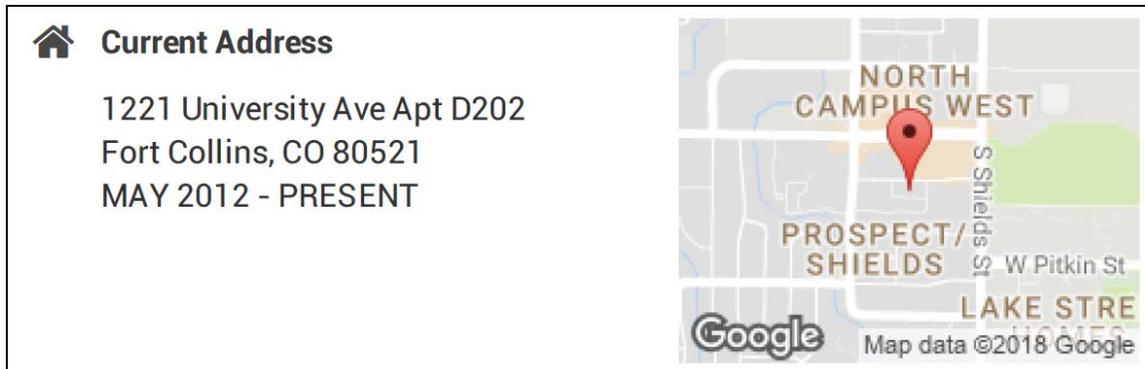
17. Document 31 (predictably) claims that Queen Tut “does not live in Colorado”, but offers no alternative domicile or residence.

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<sup>7</sup> The fact that Susan Lutzke knows how much money Patricia Negron has spent in defense costs is further indication that they remain in close contact. <https://www.youtube.com/watch?v=h0f036n2Sl0> (“The Queen Tut Tapes #1: Trish Has Spent \$8,000 Defending RDS Lawsuit”)].

18. On October 25, 2017, Lutzke was duly served by posting at her usual place of abode in Fort Collins, Colorado.

19. Prior to service, Plaintiff undertook an extensive background check of all available information about Susan A. Lutzke that included a Whitepages Premium search. Plaintiffs' background search verified Lutzke's current address as:



Plaintiffs' process server in Colorado, J.D. Roland Investigations, confirmed the address. Plaintiff's background report identified Lutzke's date of birth and confirmed other material facts about her. For instance, Plaintiffs confirmed that Lutzke is 63-years old, which is entirely consistent with the age of "Susan Holmes" who appears in the CBS 4 Denver and Fort Collins City Council videos. Plaintiffs' background report also confirmed that Lutzke has a relative, "Alec C. Lutzke", which is what Susan Lutzke told dispatch in the 911 call.

20. Process has reached Lutzke. [See § 8.01-288 ("process which has reached the person to whom it is directed within the time prescribed by law, if any, shall be sufficient although not served or accepted as provided in this chapter.")]. Lutzke's email address is [phz@tutanota.com](mailto:phz@tutanota.com). Using that email address, she made a \$25 donation to Earth Intelligence Network on June 13, 2017 under the name "Susan Lutzke". An

unrelated third-party, who has recently communicated with Lutzke via email, confirms that her email address is [phz@tutanota.com](mailto:phz@tutanota.com).

21. On September 25, 2017, counsel for Plaintiffs emailed Lutzke true copies of the Summons and Complaint and Waiver of Service of the Summons form. No error message or mailer daemon was received, confirming that the email successfully transmitted and was received.

22. On November 1, 2017, counsel for Plaintiffs again emailed Lutzke true copies of the Summons and Complaint and the Affidavit of Service. Again, no error message or mailer daemon was received.

23. On November 2, 2017, Plaintiffs complied with § 8.01-296(2)(b) of the Virginia Code by mailing to Lutzke and filing with the Court the required statutory notice. [*Documents 17 and 17-1*]. **The mailing was duly addressed to Lutzke at her usual place of abode, 1221 University Ave, # D202, Fort Collins, CO 80521, and was not returned.**

### **CONCLUSION**

Defendant, Queen Tut, is Susan Lutzke. Lutzke was properly served with process. In addition, she has also received process on several occasions via email. Documents 31 and 33 are hollow attempts to obfuscate and conceal the truth. These documents should be rejected by the Court without more.

DATED: March 7, 2018

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 7, 2018 a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will send notice of electronic filing to counsel of record and all interested parties receiving notices via CM/ECF. I also certify that a copy of this pleading was emailed in PDF to Defendants, Goodman and "Queen Tut" a/k/a Susan Lutzke

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