

Michael Waddington, Esq. (SBN 172279)
LAW OFFICE OF MICHAEL WADDINGTON, APC
9615 Brighton Way, Suite 400
Beverly Hills, California 90210
michael@waddington-law.com
Telephone: (310) 276-4100
Facsimile: (310) 276-4006

Attorney for Plaintiff,
JENIFER LEWIS

FILED
Superior Court Of California
County Of Los Angeles

JAN 06 2017

Sherri R. Carter, Executive Officer/Clerk
By Charlie E. Coleman Deputy

A6013
91411
D45 Mel Recano

SUPERIOR COURT OF STATE OF CALIFORNIA
LOS ANGELES COUNTY, CENTRAL DISTRICT

JENIFER LEWIS,

Plaintiff,

vs.

ANTONIO MARRIOTT WILSON, a/k/a
BRICE CARRINGTON, a/k/a DR. ANTONIO
M. WILSON, a/k/a TONY WILSON, a/k/a
TONY WILLSON, a/k/a ANTONIO MARIOT
WILSON, a/k/a ANTONIO MARIOTT
WILSON; FITNESS INTERNATIONAL,
LLC, a/k/a LA FITNESS; and, DOES 1 to 100,
inclusive,

Defendants.

) Case No. **BC 6 4 5 8 4 1**

) **COMPLAINT FOR DAMAGES**

) **1. Fraud**

) **2. Concealment**

) **3. Negligent Hire**

) **4. Negligent Supervision**

) **5. Negligent Retention**

) **6. Negligent Misrepresentation**

) **7. Intentional Misrepresentation**

) **8. Negligent Infliction of Emotional Distress**

) **9. Intentional Infliction of Emotional Distress**

) **10. Conspiracy**

Plaintiff JENIFER LEWIS, by and through her undersigned counsel, hereby files this
Complaint for Damages against Defendants ANTONIO MARRIOTT WILSON, a/k/a BRICE
CARRINGTON, a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY
WILLSON, a/k/a ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON;
FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS, alleging as follows:

01/06/2017

CIT/CASS: BC645841
LEA/DEP: CH2431109
RECEIVED: 01/06/17 08:35 AM
DATE PAID: \$935.00
PAYMENT: 310
CHECK: \$435.00
CASH: \$0.00
CANCE: \$0.00
CRD: \$0.00

1
2 **PARTIES**

3 1. Plaintiff JENIFER LEWIS is an individual who, at all relevant times, was and is a
4 resident of the State of California, County of Los Angeles, and who, at all relevant times, was a
5 member of Defendant FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS.

6 2. Defendant ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a
7 DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO
8 MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON is an individual who, at all relevant
9 times, was and is a resident of the State of California, County of Los Angeles, and who, at all
10 relevant times, was and is an employee of Defendant FITNESS INTERNATIONAL, LLC, a/k/a
11 LA FITNESS in a managerial capacity.

12 3. Defendant FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS (hereinafter
13 "LA Fitness") is, on information and belief, a California corporation that at all relevant times had
14 and has its principal place of business in the State of California, and who, at all relevant times, has
15 and does employ Defendant ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON,
16 a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a
17 ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON in a managerial capacity.

18 4. Plaintiff is ignorant of the true names and capacities of Defendants Does 1 through
19 10 and therefore sues them by fictitious names. Plaintiff will seek leave to amend this complaint
20 when the true names of the Doe Defendants have been ascertained. Plaintiff is informed and
21 believes and on that basis alleges that the Doe Defendants were in some way responsible for,
22 participated in or contributed to the matters, actions issues, affairs and activities detailed in this
23 Complaint and therefore should assume legal responsibility.

24 5. Each of the Defendants and/or their predecessors, affiliates, subsidiaries and related
25 entities, are and were the agents, servants, employees, fellow members, associates and/or joint-
26 ventures of each of the other remaining Defendants. Each of the Defendants acted within the
27 purpose and scope of the agency, employment or joint-venture, and the express and/or implied
28 knowledge, consent, advice and/or permission of the remaining Defendants. The acts of each

1 Defendant were approved, adopted and/or ratified by each other and together constitute a single
2 course of conduct.

3
4 6. Jurisdiction and Venue is proper in the Central District of Los Angeles County.

5 **FACTS COMMON TO ALL CAUSES OF ACTION**

6 7. LA Fitness knowingly hired and knowingly employs a career con artist, a convicted
7 felon multiple times over. LA Fitness hired him as a Club Manager knowing that he has served
8 time in a Federal penitentiary after pleading guilty to defrauding investors out of \$4 million. LA
9 Fitness allows him to directly interact with unsuspecting LA Fitness members, and to have direct
10 access to their confidential information. LA Fitness permitted him to perpetrate his con against
11 one of its members by fraudulently romancing her, and thus inflicting both irreparable emotional
12 trauma and significant financial damage. LA Fitness then inflicted further torment on its member
13 in retaliation for her knowing and revealing that its Club Manager was a Convicted-Felon-Con-
14 Artist-Manager.

15 8. LA Fitness aggressively protects the career con artist. **AFTER** the LA Fitness Club
16 Manager swindles a female LA Fitness member out of over \$50,000.00, **AFTER** she discovers –
17 ***simply by going online*** – his criminal history of preying on women, **AFTER** she obtains a
18 Temporary Restraining Order (TRO) and has it served on the LA Fitness Club Manager by two
19 armed LAPD officers at the LA Fitness facility while he is working, and **AFTER** she informs LA
20 Fitness of its Manager's criminal background – ***and his current con*** – in an effort to prevent him
21 from preying on other women at LA Fitness, LA Fitness tells her that she should stop “making
22 accusations,” and simultaneously prohibits her from going to “this [LA Fitness] location
23 anymore.”

24 9. With the intention of arming the LA Fitness Club Manager with ammunition to
25 defeat the LA Fitness member in obtaining a Permanent Restraining Order against its Manager, LA
26 Fitness provides an email acknowledging that the LA Fitness member informed LA Fitness that its
27 Manager was “a fraud and a con artist.” The LA Fitness Club Manager then attaches the email
28 from LA Fitness as an exhibit to prove that the LA Fitness Member who brought the TRO was

1 trying to get him fired, which she was, "because he placed himself at LA Fitness in a position to
2 prey on many women."

3
4 10. At the hearing on whether the TRO should become a Permanent Restraining Order,
5 not only did a Los Angeles Superior Court Commissioner find that the parties "had a former dating
6 relationship," the Court also found that the LA Fitness Club Manager placed the female LA Fitness
7 member "in a reasonable apprehension of imminent or serious bodily injury."

8 11. Even after there is a finding in a court of law that one of its Club Managers put one
9 of its Members "in a reasonable apprehension of imminent or serious bodily injury," LA
10 Fitness does not terminate that Manager's employment, but rather rewards him with a promotion
11 from the Van Nuys facility to the premier, more affluent, West LA/Bundy facility. In so doing,
12 LA Fitness knowingly grants unfettered access and unlimited opportunity for its Convicted-Felon-
13 Con-Artist-Manager to continue to prey on unsuspecting LA Fitness members, particularly its
14 female members.

15 12. During her sworn testimony before the Court, the LA Fitness member articulated
16 her motivation in pursuing an action against LA Fitness:

17 *He has placed himself at L.A. Fitness in a position to prey on so many*
18 *women, and [...] my lawyer is going to sue [...] L.A. Fitness for hiring*
him...

19 13. His name is Tony Wilson. His name is Brice Carrington. His name is Dr. Antonio
20 M. Wilson. His name is whatever he wants his name to be.

21 14. Tony is an NFL star. Brice is an Academy Award winner. Dr. Antonio M. Wilson
22 is a Doctor of Philosophy in Theology. His occupation is whatever he needs his occupation to be
23 in order to perpetrate the con.

24 15. A simple search of the Internet confirms that not only has Tony/Brice/Antonio been
25 at the Con Artist-Preying-On-Unsuspecting-Women game for well over a quarter-century, but that
26 he currently represents himself to be someone he is not to LA Fitness' members, to whom he has
27 access only because of his employment by LA Fitness.
28

I.

BEFORE, DURING & AFTER THE CON:

**THE CRIMINAL HISTORY AND CURRENT CRIMINAL ACTIVITY OF
LA FITNESS' CONVICTED-FELON-CON-ARTIST CLUB MANAGER
IS EASILY DISCOVERABLE THROUGH A SIMPLE INTERNET SEARCH**

16. A plethora of information about the LA Fitness Club Manager's twenty-five (25) year criminal career – *including his current con game* – exists on the Internet. It is accessible by anyone, even without the benefit of knowing the LA Fitness Club Manager's social security number and/or his date of birth. Following in this document are reproductions of items attesting to Tony's convictions, Brice's incarceration, and Antonio's *current con* that were found *online*. These items include news articles, public Felony Records, and screenshots of the LA Fitness Club Manager's current Internet presence. Each item ends with a link to its "Online Source."

A. **HIS NAME IS TONY WILSON.**

17. *Online*, there are multiple news articles and at least five records of Felony Convictions describing the LA Fitness Club Manager's criminal activity between 1988 and 1996. The news articles demonstrate that for more than 25 years, the LA Fitness Club Manager has mastered his con artist specialty of swindling the women he romances.

18. On May 25, 1989, an article appears in the *Orlando Sentinel* titled "Fake Football Pro Loves And Leaves – The Bills," and tells what was to become a familiar story about the criminal _ as an LA Fitness Club Manager.

The 29-year-old woman stared at her credit card statement. She had studied it at least a dozen times and still could not believe what she saw:

Women's lingerie and cosmetics totaling more than \$600. About \$1,000 in clothes and men's shoes. Dozens of restaurant meals. Bills for hotel rooms, limousines and a car. An \$840 round-trip ticket from Orlando to Dallas and New Orleans.

"Look," the woman said, pointing to another item on the \$15,000 American Express bills she received in April and May. *"He even bought a wedding ring."*

The Orlando woman never saw the ring that she says her fiancé charged to her account - just like she never saw the makeup and underwear. **Antonio Marriott**

01/06/2017

1 **Wilson, the woman said, had taken the card she had given him, gone on a**
2 **shopping spree and married someone else.**

3 Now he's in jail, after police heard her story and similar stories from three other
4 women.

5 "I've had this card over two years and I've never had more than \$200 on it. Tony
6 had it two weeks," said the woman, a single mother who is supporting her small
7 son on a clerk's salary.

8 **'He got married on my card. He bought the woman a ring on my card,' she**
9 **said. "He really did a whammy on me."**

10 Although the Orlando clerk lost the most money, police said she wasn't the only
11 person taken in by the handsome man who has posed as a rich football player since
12 moving to Orlando in December. She is among four women - three who told The
13 Orlando Sentinel they were engaged to Wilson - who have filed complaints with
14 Orlando police.

15 One of those complaints led to the arrest Wednesday of Wilson on a charge that he
16 swindled a California woman out of \$5,000. **He also was charged with**
17 **possession of a firearm by a convicted felon.**

18 Wilson, who was convicted of forgery in California last year, was being
19 held without bond Wednesday in the Orange County jail. He could not be
20 reached for comment.

21 **According to police complaints, Wilson's method varied with each of his**
22 **victims - a bad check, a borrowed credit card, a fake investment. But one**
23 **thing remained constant** - his posing as a football player to help gain people's
24 trust.

25 Warren Welsh, director of security for the National Football League, said his office
26 gets dozens of complaints a year about people posing as football players.
27 Impersonators use the mystique of the professional athlete to get sex or money, he
28 said.

29 **But witnesses say the Orlando impersonator took his show further than most:**
30 **He made a guest appearance on a television talk show.**

31 On a recent Monday morning, Wilson appeared on the Channel 35 talk show Good
32 Day and chatted easily with host Rebecca Randall about his past and future in
33 professional football.

34 **Wilson, who often called himself Tony Willson,** has never played a professional
35 game in the NFL league, security director Welsh said.

36 Before the show, Wilson introduced himself as Tony "Dokie" Willson, Los Angeles
37 Raiders player No. 85. As part of the show, Randall aired footage of former

01/06/2017

1 Raiders player Dokie Williams - the real No. 85. She thought the two men were the
2 same.

3 After the show, about a dozen men and women called to tell Randall differently.

4 'They said he never played football,' Randall recalled. . . . Some said they were
5 engaged to him."

6 **The clerk watched the show, thinking, "What will he do next?"**

7 **She said she met Wilson in December at the front counter where she worked,**
8 **and they began to date. Later the clerk would be told that while Wilson was**
9 **romancing her, he was also wooing an Orlando bank employee and a Eustis**
10 **substitute teacher.**

11 Each of the three women told the Sentinel that Wilson said he was rich and had
12 money put away in California. They said he gave them posters of a football player
13 in full gear and helmet, and autographed them Tony "Lester Hayes" Willson, No.
14 37.

15 **He set a December wedding date with all three - and with a woman in Texas as**
16 **well, they said.**

17 Now, the Orlando clerk sees that there were signs of what was to come - like the
18 way Wilson kept changing which football team he played for. First the San Diego
19 Chargers. Then the L.A. Raiders. Then the Miami Dolphins.

20 **But at the time, she trusted him.** So when he told her his credit card had been
21 stolen, she agreed to give him an American Express on her account, she said.

22 Then he disappeared, leaving her to pay a \$15,000 credit card bill, she said. She
23 makes \$27,000 a year.

24 **"It has really stressed me out," the woman said. "I've been sick a lot. I've lost**
25 **15 pounds."**

26 Still, it was in large part due to her determination that police arrested Wilson
27 Wednesday.

28 Wilson's biggest mistake, the clerk said, was in asking her to pay his bills and
telling her not to worry about the money because soon all his savings would be in
her checking account.

She didn't pay them. But she did use them. After the American Express bill arrived,
she got on the phone and started dialing the numbers on his itemized telephone
bills, looking for anyone with information on his whereabouts. (Emphasis added.)

Online Source: http://articles.orlandosentinel.com/1989-05-25/news/8905250097_1_orlando-woman-wilson-credit-card.

19. Another article in the *Orlando Sentinel*, dated June 16, 1989, just a few weeks later, titled "Charges Dropped," warns:

GRAND THEFT CASE.

State prosecutors have dropped grand theft charges against a man who police said convinced a California woman to invest in a fake Orlando business. Antonio Wilson, 26, of California, will remain in the Orange County jail without bail on a weapons charge, said Orlando Police Detective Richard Tiffany. Prosecutors said the grand theft charges must be brought in California because the woman, a rehabilitation therapist who was visiting Orlando, returned to California before deciding to invest \$5,000. Wilson also flew to California and cashed the therapist's check there, Tiffany said. **Wilson, who was convicted of forgery in California last year, was arrested by Orlando police May 25.** Authorities say he has posed as an NFL football player since he moved to Orlando in December and was engaged to at least three women, all of whom said he owes them money. (Emphasis added.)

Online Source: http://articles.orlandosentinel.com/1989-06-16/news/8906160051_1_grand-theft-orlando-forgery.

20. An online search of Felony Convictions in San Diego County, California, shows that on February 28, 1988, Tony Wilson (a/k/a Antonio Marriott Wilson) was arrested, Case Number CR95166. According to reliable news sources, Tony Wilson was convicted of forgery.

Case Title: **DEFENDANT ANTONIO WILSON**

Case Number: **CR95166** Case Location: **San Diego**

Case Type: **Criminal** Date Filed: **01/28/1988**

Defendant				
Last Name	First Name	Birth Year	AKA	DA Number
WILSON	ANTONIO	1963		B3251601

Imaged Case	
Documents are available for viewing at all Older Records Kiosks	
Select [File Location] button above for location details	

Microfilm			
Microfilm ID	Location	Reel Number	Frame Number
1	SD-OREC	1628	63

Online Source:

<http://courtindex.sdcourt.ca.gov/CISPublic/casedetailr?casenum=CR95166&casesite=SD&applcode=R>.

21. An online search of Felony Convictions in Orange County, Florida, shows that on May 25, 1989, Tony Wilson (a/k/a Antonio Marriott Wilson) was arrested on two counts of Criminal Felony, Case Number 1989-CF-005005-A-O and Case Number 1989-CF-005006-A-O.

22. According to reliable news sources, Tony Wilson faced charges of grand larceny, possession of a weapon by a convicted felon, and flight to avoid forgery conviction in the State of Florida.

23. In Case Number 1989-CF-005006-A-O, *State Of Florida vs. Wilson, Antonio Marriott*, the criminal felony charge is stated in the Court record as "THEFT Statute: 812.014 Second Degree-Misd."

24. In Case Number 1989-CF-005005-A-O, *State Of Florida vs. Wilson, Antonio Marriott*, the criminal felony charge is stated as "STATUTE USED FOR JUVENILE CONVERSION PURPOSES ONLY Statute: 999.99999 No Degree."

#	Case Number	Description	Type	Status	DOB	Judge Name	Date
1	1989-CF-005006-A-O	STATE OF FLORIDA VS. WILSON, ANTONIO MARRIOTT	Criminal Felony	Closed	02/02/1963		05/25/1989
2	1989-CF-005005-A-O	STATE OF FLORIDA VS. WILSON, ANTONIO MARRIOTT	Criminal Felony	Closed	02/02/1963	Keith A Carsten	05/25/1989

Online Source: <https://myeclerk.myorangeclerk.com/>.

25. An online search of Felony Convictions in Dallas County, Texas, shows that on December 2, 1994, the charge criminal offense of "THEFT_CK_20" was filed against TONY WILLSON (a/k/a Antonio Marriott Wilson), "DOB 02021963." Tony's last name, Wilson, was spelled WILLSON, with two "LL"s instead of one "L."

26. An online search of all records in Orange County, Florida, reveals that on 05/26/1989, the day after Tony Wilson (a/k/a Antonio Marriott Wilson) was arrested, Denise Diana Wilson filed for an Annulment against Antonio Mariott Wilson (Marriott spelled Mariott (with only one "r")) Case # 1989-DR-004173-O; Final Judgment was entered on 01/21/1994. (He has also spelled Marriott as Mariot (with only one "r" and one "t").

#	Case Number	Description	Type	Status	DOB	Judge Name	Date
1	1989-DR-004173-O	WILSON, DENISE DIANA vs. WILSON, ANTONIO MARIOTT	Annulment	Closed - SRS		Jenifer M Harris	05/26/1989

Online Source: <https://myeclerk.myorangeclerk.com/>.



Dallas County Felony and Misdemeanor Courts Case Information

DA CASE ID MB9408872 JUDCL CASE ID MB9408872
A010 DEF NAME WILLSON C010 DEF NAME WILLSON

JUDICIAL INFORMATION

A010-020-030-040 FILE DATE 120294
DEF NAME WILLSON, TONY RACE B SEX M DOB 02021963 AGE 53
DEF ADRI ***** AC ___ PH ___ SS *****
DEF CITY ___ ST ___ ZIP ___ DLNUM ***** DLST ___
OFF THEFT CK 20 DT 0717942 TYP/CL M B GOC/CAT ___ CODE PW000000
COMT ___ SID NUM ___ OF AMT ___
COMPLAINANT ***** TAPE # ___ ARREST DATE 000000
JUV STAT _ REPEAT OFFENDER _ CAREER OFFENDER _ ORIG-LOC UNKNOWN CURR-LOC O
FILING AGENCY TX0570001 SER/CAS NO ___ ARREST NUM ___
LAI NUM ___ AIS/DSO NO ___ BOOKIN NUM ___
JP FILE DATE 000000 JP CASE ID ___ JP COURT ID ___ FED _ EVH _ AFF _
MAGISTRATE DATE 000000 MAGIS COURT _ MAGIS JUDGE _ BOUND OVER _
EXAM TRIAL DATE 000000 EXAM COURT _ EXAM JUDGE _ IND METH IND
GJ/H/R DT ___ GJ# ___ GJ/W/FILE 120394 GJ DS X DA DSP _ ACC _ REAS _
DA DISPOS DATE 000000 MISDEMEANOR REDUCTION _ SENTENCE PROBATED _
JUDCL CASE ID MB9408872 GJ CT _ PROS STAT _ PROS NAME ___
COURT ASSIGNED TO MH DATE ASSIGNED 120394 ASSIGNED BY C REASON B
PRECEEDING DA CASE ID ___ SUCCEEDING DA CASE ID ___
TRN ___ TRS ___ WARRANT STATUS R STATE OFF CD 23000019

(Emphasis added.)

Online Source: <http://www.dallascounty.org>.

27. An online search of Felony Convictions in Dallas County, Texas, shows that on August 16, 1996, the charge criminal offense of "THEFT_20K" was filed against Tony Wilson (a/k/a Antonio Marriott Wilson), "DOB 02021963."

///

///

///

///

///

///

///



Dallas County Felony and Misdemeanor Courts Case Information

DA CASE ID F-9602598 JUDCL CASE ID F-9602598
A010 DEF NAME WILSON C010 DEF NAME WILSON

JUDICIAL INFORMATION

A010-020-030-040 FILE DATE 081696
DEF NAME WILSON_ANTONIO_MARRIOTT RACE B SEX M DOB 02021963 AGE 53
DEF ADR ***** AC PH SS *****
DEF CITY IRVING ST TX ZIP DLNUM ***** DLST _
OFF THEFT 20K DT 033092 TYP/CL F 2 GOC/CAT __ CODE TH000000
COMT SID NUM OF AMT
COMPLAINANT ***** TAPE # ARREST DATE 000000
JUV STAT _ REPEAT OFFENDER _ CAREER OFFENDER _ ORIG-LOC UNKNOWN CURR-LOC U
FILING AGENCY TXDPD0000 SER/CAS NO 000173 ARREST NUM
LAI NUM AIS/DSO NO BOOKIN NUM
JP FILE DATE 000000 JP CASE ID JP COURT ID FED _ EVH _ AFF _
MAGISTRATE DATE 000000 MAGIS COURT MAGIS JUDGE BOUND OVER _
EXAM TRIAL DATE 000000 EXAM COURT EXAM JUDGE IND METH IND
GJ/H/R DT 083096 H GJ# 3693_A2* GJ/W/FILE 090496 GJ DS T DA DSP _ ACC _ REAS _
DA DISPOS DATE 000000 MISDEMEANOR REDUCTION _ SENTENCE PROBATED _
JUDCL CASE ID F-9602598 GJ CT FS PROS STAT C 381 PROS NAME DUNCAN_L
COURT ASSIGNED TO FT DATE ASSIGNED 081796 ASSIGNED BY C REASON B
PRECEDING DA CASE ID SUCCEEDING DA CASE ID
TRN TRS WARRANT STATUS R STATE OFF CD 23000031

(Emphasis added.)

Online Source: <http://www.dallascounty.org>.

B. HIS NAME IS BRICE CARRINGTON.

28. Around the beginning of the new millennium, Tony Wilson, the romancing NFL star, morphs into Brice Carrington, the Academy Award-winning sound effects engineer.

29. As with the LA Fitness Club Manager's first incarnation as Tony Wilson, a significant number of *online sources* attests to the LA Fitness Club Manager's criminal behavior under his new name, Brice Carrington, and, occasionally, his birth name of Antonio Mariot Wilson. Several of these sources are reproduced below.

///

///

1
2 30. On December 26, 2006, Brice Carrington incorporates BCarrington, Inc. with the
3 California Secretary of State. BCarrington, Inc. becomes the basis for the future LA Fitness Club
4 Manager's next con.

5 Entity Name:	BCARRINGTON, INC.
6 Entity Number:	C2794412
7 Date Filed:	12/26/2006
8 Status:	FTB SUSPENDED
9 Jurisdiction:	CALIFORNIA
10 Entity Address:	21001 SAN RAMON VALLEY BLVD #A4-110
11 Entity City, State, Zip:	SAN RAMON CA 94583
12 Agent for Service of Process:	BRICE CARRINGTON
13 Agent Address:	21001 SAN RAMON VALLEY BLVD #A4-110
14 Agent City, State, Zip:	SAN RAMON CA 94583

15 *Online Source:* <http://kepler.sos.ca.gov>.

16 31. On May 3, 2007, Brice Carrington, a Sound Designer, issues a press release on a
17 leading *online* news and press release distribution service, *PRWeb*.

18 **Brice Carrington, Sound Designer, Establishes Ultimate FX, a Sound**
19 **Library That Revolutionizes the Industry by Bringing Hollywood**
20 **Styled Sound Effects Directly to the Consumer**

21 Ultimate FX, the new sound library led by sound designer Brice Carrington
22 produces some of the world's most popular sounds for feature films, video
23 games, software and ringtones. With over 20 years of experience, and
24 amassing a vast sound collection, led Brice to create Ultimate FX, a
25 surround sound library whose materials are in great demand by consumers.
26 A key element of the signature Carrington sound is the use of a male
27 African lion in virtually all of his sound effects. All of Carrington's sounds
28 are original works that are recorded in the field, using six microphones,
creating the true 5.1 surround sound.

SAN RAMON, Calif. (PRWEB) May 3, 2007

According to Carrington, "Working in sound production over the years
has afforded me the ability to create some of the most unique sounds
you will ever hear, and we will soon have the ability to share our library of
sound effects with the world. Now anyone can incorporate professional
sound effects into their own home movies." An example of an Ultimate FX
exclusive is the recreation of the famous sound of the T-Rex eating, in the
film Jurassic Park. This sound was created by recording a lion crunching
bones; the splash of hogs in water; the flesh tearing sound of a lion tearing
the fur off of a rabbit; an elephant's roar; even the whirring of an old-school

1 push lawn mower. Ultimate FX was the premier surround sound effects
2 library of BMG/Killer tracks, one of the most state of the art sound libraries
3 in the world. Ultimate FX has also been used at Universal Studios theme
4 parks in Hollywood, and Sea World in Orlando, Florida. Ultimate FX is
5 currently sold by Pinnacle Systems and Carrington is in development of a
6 consumer based sound mixer which will allow its users to create their own
7 sound effects in their home movies. "By including many ready made sound
8 files from Ultimate FX in Pinnacle's video editing product line, customers
9 can easily create polished, Hollywood-style results that are fun to share with
10 family and friends," says Amy Whelan of Pinnacle Systems. "Beginning
11 with Pinnacle Studio version 9, Carrington's audio content is now also
12 included in Pinnacle's most recent iteration, Studio 11 Titanium Edition."

9 Carrington has always wanted to make professional sound effects you hear
10 at the movies available to consumers and independent filmmakers, at an
11 affordable price. This is not a new concept, but our approach to it is. It may
12 not be popular to some, but recreating the sounds heard in movies and
13 making them available to consumers makes sense. To show consumers how
14 to make their own sound effects with the click of a mouse is a natural
15 progression in amateur movie making and could be a great asset to the
16 independent film maker. (Emphasis added.)

14 *Online Source:* http://www.prweb.com/releases/sound/ultimate_fx/prweb523772.htm.

15 32. To raise funds, Brice Carrington tells potential investors in BCarrington, Inc. that he
16 is a three-time Oscar winner and is involved in many Hollywood projects. He displays Oscars and
17 photos of himself with the statuettes at his Pleasanton home during fundraising parties.

18 *Online Source:* <http://www.fugitive.com/2009/09/08/pleasanton-man-brice-carrington-who-falsely-claimed-that-he-was-a-three-time-oscar-winner-pleads-guilty/>.

19 33. On September 8, 2009, the East Bay Times posts an article titled "*Former*
20 *Pleasanton Investor Who Fabricated Hollywood Background Pleads Guilty.*"

21 OAKLAND — A former Pleasanton man, who faked a glamorous
22 Hollywood background to win clients, has pleaded guilty to federal wire
23 fraud and tax evasion charges.

24 **Prosecutors with the U.S. Attorney's Office say Brice Carrington told**
25 **investors that he was an Academy Award-winning sound effects**
26 **engineer — going so far as to commission a jeweler to create a fake**
27 **Oscar statuette with his name on it.**

27 Carrington now lives in Ojai, but while he was in Pleasanton he promised 10
28 investors that he would double or triple their returns on sound effects design
projects. After he received more than \$4 million from his investors from

1 2001 to 2005, prosecutors say he only used about \$430,000 toward the
2 projects.

3 *Instead, Carrington, 46, used a substantial portion of the money for*
4 *personal expenses, including the purchase of three high-end vehicles: a*
5 *Lamborghini Murcielago, a Hummer H2 and a Mercedes-Benz SL500R.*

6 **The U.S. Attorney's Office said the cars were props used to draw new**
7 **investors.**

8 Carrington, who made his guilty plea on Friday, *told investors he was a*
9 *three-time Oscar winner and was involved in many Hollywood projects.*
10 *He displayed Oscars and photos of himself with the statuettes at his*
11 *Pleasanton home during fundraising parties. Carrington also admitted*
12 *that he failed to report \$581,500 on his 2003 tax return.*

13 **He was charged Aug. 4 with five counts of wire fraud and four counts of**
14 **tax evasion. Under a plea agreement he pleaded guilty to one count**
15 **each of wire fraud and tax evasion, agreed to a four-year sentence, to**
16 **pay \$4,184,367 in restitution and to forfeit the three luxury cars.**

17 He could have faced up to 20 years in prison and a \$250,000 fine for each
18 count of wire fraud and five years of prison and a \$250,000 fine for each
19 count of tax evasion and restitution.

20 Carrington will be sentenced Jan. 8. (Emphasis added.)

21 Online Source: [http://www.eastbaytimes.com/2009/09/08/former-pleasanton-investor-who-fabricated-hollywood-](http://www.eastbaytimes.com/2009/09/08/former-pleasanton-investor-who-fabricated-hollywood-background-pleads-guilty/)
22 background-pleads-guilty/.

23 34. On January 9, 2010, the *San Francisco Chronicle*, in an article titled "Fake Oscar
24 Winner Gets 4 Years For Fraud," reports:

25 A Pleasanton man who falsely claimed he was a three-time Oscar-winning sound
26 designer was sentenced Friday to four years in federal prison for defrauding
27 investors of nearly \$4 million in an investment scheme.

28 Brice Carrington, 46, must surrender in February to begin serving his sentence for
wire fraud and tax evasion, U.S. District Judge D. Lowell Jensen said at a hearing
in Oakland.

"May I object?" William Clay Cunningham, 47, of San Ramon called out from the
gallery.

Minutes earlier, Cunningham had addressed the court, asking that Carrington
be imprisoned immediately because he was a "very narcissistic, sociopath con

1 man" who had stolen \$300,000 from him to finance "this stupid sound
2 project." Cunningham said his home was in foreclosure.

3 The judge said he appreciated Cunningham's comments but that Carrington could
4 surrender next month. The judge also ordered him to pay full restitution.

5 Carrington told the court that he regretted his actions. "I want to be able to make it
6 right," he said as Cunningham shook his head.

7 After the hearing, Cunningham tried to take a picture of Carrington with his cell
8 phone in a courthouse hallway. Carrington's attorney, Randy Sue Pollock, and
family members shouted at Cunningham in protest, and his phone was knocked to
the ground.

9 As part of a plea deal, federal prosecutors dismissed four other counts of wire fraud
10 and several counts of tax evasion.

11 Carrington admitted that he had lured investors by spinning a series of yarns. He
12 told people he had won three Oscars, had an extensive background in sound design
and had ties to the Academy of Motion Picture Arts and Sciences.

13 Carrington admitted that he had received \$3.6 million by victimizing 13 people.
14 Almost none of the money went to designing sound effects; most went for such
expenses as the mortgage on his \$2.6 million Pleasanton home and fancy cars.

15 **In 2006, Carrington paid \$52,000 to Walnut Creek jeweler Davidson & Licht**
16 **to create three fake Oscar statuettes, according to a civil suit that the**
17 **Academy of Motion Picture Arts and Sciences filed, claiming copyright**
18 **infringement. He displayed at least one of the fake Oscars at his home,**
authorities said.

19 Carrington, born Antonio Wilson, has a previous forgery conviction in San Diego
20 and a larceny conviction in Dallas, court records show. (Emphasis added.)

21 *Online Source:* <http://www.sfgate.com/crime/article/Fake-Oscar-winner-gets-4-years-for-fraud-3204336.php>.

22 35. The author of the *New York Times* Bestseller *How To Smell A RAT: The Five Signs*
23 *of Financial Fraud*, has a website called *Investment Fraud Profiles*; Brice Carrington is one of the
24 Rats who is profiled *online*.



Name: Brice Carrington
Location: California
Stolen: \$4 million
Crime: Wire fraud, tax evasion
Story: [Click here](#)

28 *Online Source:* <http://www.smell-a-rat.com/investment-frauds/>.

01/06/2017

1
2 36. In the online *How To Smell A Rat Investment Fraud Profiles* of Brice Carrington, if
3 the reader clicks the "Story" link, a September 8, 2009, article published in *Investment News*
4 appears.

5 **Phony Oscar winner 'fesses up to \$4M investment scam**

6 *Brice Carrington, who had a jeweler make him a fake Oscar trophy as part*
7 *of an elaborate sham, pleaded to nine counts of wire fraud and tax evasion*

8 An Ojai, Calif., man who pretended to be an Academy Award winner to attract
9 wealthy individuals to a fraudulent investment scheme, has pleaded guilty to
10 several charges of wire fraud and tax evasion.

11 Brice Carrington, 46, formerly of Pleasanton, Calif., admitted Friday that between
12 2001 and 2005, he falsely represented to investors that he was a three-time Oscar-
13 winning sound effects designer and that he was well-established in the
14 entertainment industry, according to a statement from U.S. Attorney Joseph P.
15 Russoniello's office.

16 **His acts defrauded at least 10 investors out of about \$4 million, according to**
17 **the statement, which noted Mr. Carrington specifically pleaded guilty to five**
18 **counts of wire fraud and four counts of tax evasion in the U.S. District Court**
19 **for the Northern District of California.**

20 Mr. Carrington promised investors double-digit returns on investments in various
21 sound effects design projects.

22 In a bid to make him appear more credible with potential investors, Mr. Carrington
23 paid a jeweler to make him an Oscar statuette, which he often flaunted to lure
24 investors into investing money into his scheme.

25 Instead of investing their assets in legitimate projects, however, Mr. Carrington
26 used the investors' money to purchase several vehicles: a Lamborghini Murcielago,
27 a Hummer H2 and a Mercedes SL 500R, the statement said.

28 **As part of a plea agreement, Mr. Carrington agreed to a prison term of 48**
months and must pay restitution of \$4.2 million.



He also agreed to forfeit his interest in the cars.

Mr. Carrington is scheduled to appear before a judge for sentencing Jan. 8, 2010.

Lawyer Randy Sue Pollock, who is listed on court filings as Mr. Carrington's
representative, was not immediately available for comment. (Emphasis added.)

Online Source: <http://www.investmentnews.com/article/20090908/REG/909089979/1094/INDaily01>.

37. On August 13, 2009, an article by Deardra Shuler appears on *Lipstick Alley*, an online discussion forum.

08-13-2009, 11:59 AM	
<u>cheyanne1021</u>	
Coach	
	
	
Date Apr 2006	
Posts 6,564	
	<i>Brice carrington - he's a fake!:</i>
	Phony soundman faces wire fraud and tax evasion charges.
	<u>Brice Carrington</u> , 46, who falsely claimed to be a Hollywood sound 'it' man who worked on "Jurassic Park," "King Kong," and several other motion pictures, was recently arraigned on five counts of wire fraud and four counts of tax evasion in U.S. District Court in Oakland.
	<u>Carrington</u> was charged in federal court with defrauding investors out of more than \$3.3 million via an investment scheme.
	Court documents accuse the felonious sound engineer of masterminding a scheme to defraud investors by promising them big returns on their investment via various sound-effects design projects he manufactured through his company, Ultimate FX.
	Convincing investors that he was a 3-time Oscar winner connected to the Academy of Arts and Sciences, <u>Carrington</u> paid a Walnut Creek, California jeweler to make phony Awards which he displayed in his home to convince potential investors he was a successful award winning sound engineer.
	Unbeknownst to his investors, he used their money to pay the mortgage on his \$2.6M dollar home, located within a gated community on the grounds of the Ruby Hill <u>Golf Club</u> in Pleasanton, CA.
	<u>Carrington</u> also purchased 3 cars - a 2003 <u>Lamborghini Murcielago</u> , a 2005 Hummer H2 and a 2006 Mercedes SL500R approximately worth \$490,000 collectively. He used these trappings of success to fool potential investors.
	According to Internal Revenue Service Agent Maya Raichbart's unsealed affidavit, <u>Brice Carrington</u> has been under investigation since 2006. Mentioned within the affidavit is a 2007 EURweb retraction article wherein Mr. <u>Carrington</u> wrote a letter admitting he made false statements to EURweb "People of Note" reporter, yours truly, Deardra Shuler, about creating sound effects on major motion pictures through the Academy of Arts and Sciences. In addition, <u>Carrington</u> stated via this retraction, that he had also lied about winning 3 Academy Awards. Despite these admissions, <u>Carrington</u> hired a lawyer to threaten EURweb with a lawsuit shortly after their retraction article was published. The lawsuit never manifested because I had taped <u>Carrington</u> during my interview with him. The tape verified that Mr. <u>Carrington</u> had made the very statements he was at that time denying.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

01/06/2017

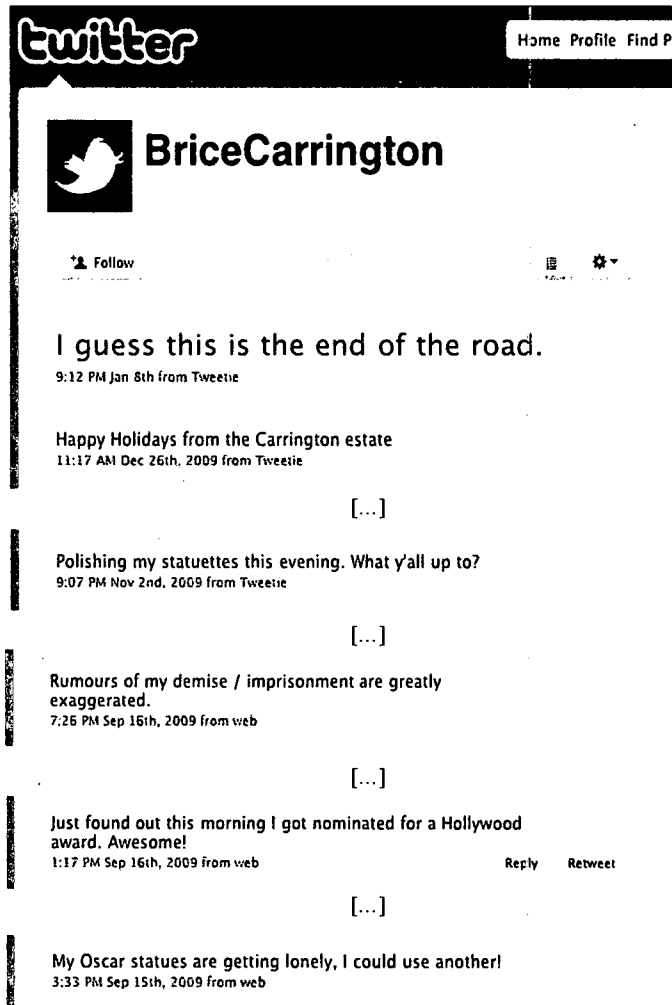
	<p>Born Antonio Mariot Wilson¹, he legally changed his name in the 1990s to <u>Brice Carrington</u>.</p> <p>According to Raichbart's affidavit, Mr. <u>Carrington</u> is not new to crime. Investigators found <u>Carrington</u> had over the course of time utilized 3 different social security numbers. Also, he had been convicted of forgery in San Diego in 1988. In 1989, he faced charges of grand larceny, possession of a weapon by a convicted felon, and flight to avoid forgery in Florida. <u>Carrington</u> was convicted of felony larceny in Dallas, Texas, in 1992, and was arrested in Dallas for theft of stolen property by check in 1995. He is currently a fugitive in Texas.</p> <p>Investigations are still underway.</p> <p>Deandra Shuler is a well published journalist who has profiled celebrities and written about people of note for many years. In addition to her column at EURweb.com, she is the host of her radio show "Topically Yours" on BlakeRadio.com and has shows featured on NPR via Initiative Radio. Ms. Shuler is featured in several papers. Her international column in Sweden, "Music Pastures" is available at <u>Soulinterviews.com - Audio Interviews I The Soul Chronicle I Music- Book- & DVD Recommendations I The Japan Check</u>.</p>
--	--

Online Source: <http://www.lipstickalley.com/showthread.php/198319-Brice-carrington-he-s-a-fake%21?highlight=brice+carrington>.

38. Even though on August 4, 2009, Brice Carrington was charged with five (5) counts of wire fraud and four (4) counts of tax evasion – *United States v. Carrington*, 09-CR-0791 DLJ (N.D. Cal., 2009) – and even though articles appear *online* that detail his cons and crimes, on September 10, 2009, he either creates a new Twitter account or continues using an existing Twitter account, for apparently the sole purpose of taunting his victims.

- On September 15, 2009, at 3:33 pm, Brice Carrington tweets:
"My Oscar statues are getting lonely. I could use another!"
- On September 16, 2009, at 1:17 pm, Brice Carrington tweets:
"Just found out this morning I got nominated for a Hollywood award. Awesome!"
- On September 16, 2009, at 7:26 pm, Brice Carrington tweets:
"Rumours of my demise/imprisonment are greatly exaggerated."
- On November 2, 2009, at 9:07 pm, Brice Carrington tweets:
"Polishing my statuettes this evening. What y'all up to?"

- On December 26, 2009, at 11:17 am, Brice Carrington tweets:
"Happy Holidays from the Carrington estate."
- On January 8, 2010, the day he was sentenced to serve four (4) years in federal prison, at 9:12 pm, Brice Carrington tweets:
"I guess this is the end of the road."



Online Source: <http://designingsound.org/2010/01/sound-designer-brice-carrington-gets-4-years-for-fraud/>.

39. On January 11, 2010, *DesigningSound.org*, a resource dedicated to the art and technique of sound design, posts: "'Sound Designer' Brice Carrington Gets 4 Year for Fraud."¹

¹ On October 20, 2009, *The Hollywood Reporter* posts an online article titled "ACADEMY SUES MAN CLAIMING TO BE 'OSCAR WINNER.'" It states that the Academy of Motion Picture Arts and Sciences filed "a copyright infringement lawsuit against [...] Brice Carrington for claiming he was a three-time 'Oscar winner' in sound design [and for paying] a jeweler to create a fake Academy Award statue [...]." *Academy of Motion Picture Arts and Sciences v. Carrington*, 09-CV-04899 SC (N.D. Cal., 2009). Online Source: <http://reporter.blogs.com/thresq/2009/10/academy-oscar-lawsuit.html>.

"Sound Designer" Brice Carrington Gets 4 Years for Fraud

January 11, 2010 by Miguel Isaza — 6 Comments



" A Pleasanton man who falsely claimed he was a three-time Oscar-winning sound designer was sentenced Friday to four years in federal prison for defrauding investors of nearly \$4 million in an investment scheme.

Scene 1 – Lying

" It was Brice Carrington who gave King Kong his roar, the T-Rex and other dinosaurs their menacing sound in the movie Jurassic Park, put the hiss in Snakes on a Plane, the swoosh in Superman's flight and the swirling sound in Spiderman's web-shooting. Carrington is the man behind the pops, bangs, booms and blasts of the firepower in Miami Vice, True Lies, The Fantastic Four and the Incredible Hulk, etc.

Carrington received 3 commemorative Oscars for "King Kong," "Ghost and the Darkness," and "Jurassic Park." He has created sound effects for 41 blockbuster films, including Jurassic Park 3, Blade, The Blood Hunt, Rush Hour 2, Van Helsing, Superman Returns, Spiderman, and the Mummy Returns sequels.

Scene 2 – Retraction

" I am Brice Carrington. I am writing this note to address comments made about me and to state some facts about my work. All the statements made that say directly that I have NEVER worked on a film or have won an academy award for sound is absolutely true. I have never worked on a motion picture nor have I ever won an academy award. The fact is, I am a sound designer, and I make recreations of sounds found in films and sell them to the public through a brand called Ultimate FX. I am completely responsible for all the misleading or incorrect statements made about me in the press. My effort was to create press for the brand Ultimate FX, which I am the author. I did this foolishly. This is a library where I have made my OWN versions of movie sounds. I have no association with the Academy of Motion Pictures Arts and Sciences. I commemorate the Oscars by creating a version of the main characters in films that win Oscars. Like in Jurassic Park, we make a T-Rex using hogs in water, lion growls, a lawn mower and elephant roars. That is My version. I sell this and other sounds complete with the stems to consumers. This is a lawful enterprise, but misleading the public or allowing mis-characterizations is wrong. I am issuing an apology for making all of the misleading or mischaracterizations of my work. I apologize to those in the sound industry and the makers of the original works and studios that distribute them for this offense. To correct this, I will ask for retractions were appropriate in the press. I will also refrain from any further public comments and allow the brand and the product to speak for itself through traditional means of sales and marketing. To those in the sound industry and those specifically I have offended, you have a right to be upset, and I offer my sincere apology. I am sorry that you had to spend one minute of your time addressing this.

The End – Sentence

" Carrington admitted that he had lured investors by spinning a series of yarns. He told people he had won three Oscars, had an extensive background in sound design and had ties to the Academy of Motion Picture Arts and Sciences.

Carrington admitted that he had received \$3.6 million by victimizing 13 people. Almost none of the money went to designing sound effects; most went for such expenses as the mortgage on his \$2.6 million Pleasanton home and fancy cars.

In 2006, Carrington paid \$52,000 to Walnut Creek jeweler Davidson & Licht to create three fake Oscar statuettes, according to a civil suit that the Academy of Motion Picture Arts and Sciences filed, claiming copyright infringement. He displayed at least one of the fake Oscars at his home, authorities said.

Carrington, born Antonio Wilson, has a previous forgery conviction in San Diego and a larceny conviction in Dallas, court records show.

Online Source: <http://designingsound.org/2010/01/sound-designer-brice-carrington-gets-4-years-for-fraud/>.

40. On June 28, 2012, *ScamVent*, an online source for scams and frauds, posts two "Topics," one for "Brice Carrington a/k/a Antonio Wilson," and the other for "ULTIMATE FX, Brice Carrington a/k/a Antonio Wilson."

June 28, 2012 at 2:19 pm

#17288

Topic: ULTIMATE FX, Brice Carrington a/k/a Antonio Wilson
in forum Other Scams / Fraud

Author Search Results

June 28, 2012 at 2:19 pm

#27266

Topic: BRICE CARRINGTON a/k/a ANTONIO WILSON
in forum Other Scams / Fraud

Online Source: http://scamvent.com/forums/search/?bbp_search=Brice+Carrington.

41. On September 4, 2012, and December 25, 2012, two posts appear on the online website *Fugitive Watch*, under the article titled "Pleasanton Man Brice Carrington Who Falsely Claimed That He Was A Three-Time Oscar-Winner Pleads Guilty."

Nuts!

December 25, 2012 at 3:56 am

Well he must've cheated on his wife b/c I had a friend who went on a few dates with him. After the second date, she new he was a con artist. He kept bragging about his three freaking oscars, Snakes on a Plane, and how he dated all of these celebrity women. He also walked around like he was God's greatest gift. What a loser!

Houston

September 4, 2012 at 6:28 pm

You should see brice now. He's writing a book in prison about the bible and has a publisher. Make sure you get your money from him.

Online Sources: <http://www.fugitive.com/2009/09/08/pleasanton-man-brice-carrington-who-falsely-claimed-that-he-was-a-three-time-oscar-winner-pleads-guilty/>.

42. **While incarcerated in Federal Prison at FCI Englewood in Colorado**, the future LA Fitness Club Manager plants the seeds for his next con game. On July 29, 2013, while in jail, Brice Carrington joins *APSense*, a web 2.0 enabled social network designed to help business owners, *online* marketers and affiliates build their own personal business network of local contacts or on a global scale. In his post, Brice Carrington is still representing that he has "more than 25 years of experience as a sound producer," and apparently **for the first time online acknowledges that he, Brice Carrington, wrote Behind The Faith.**



APSense® How It Works Explore Join APSense Username: Password:

Brice Carrington

Brice Carrington ☆

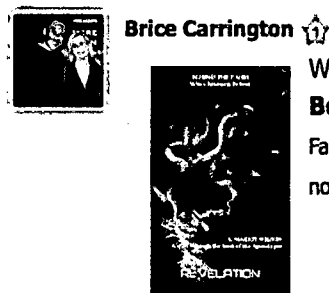
Joined APSense since, July 29th, 2013, From Los Angeles, United States.

- 0 connections
- 0 recommendations
- Junior (4)
- Computers, Music, Others

About Brice

Brice Carrington, a revolutionary sound engineer is well known for his creative work in sound industry. Having more than 25 years of experience as a sound producer he contributes to feature films, video games and computer software. He travelled around the world for recording and capturing original sounds of different animals to give more real impact.

[...]



Brice Carrington ☆

Wrote an article.

Behind the Faith

Faith is believe in God and complete acceptance of God's will. For a Christian it is not only the collection of beliefs and different rituals, it is...

Like it - View - Jul 29th 06:12

Online Source: <https://www.apsense.com/user/bricecarrington>.

1
2 43. During Brice Carrington's time in Federal Prison, he placed a post on
3 ForTalent.com, an *online* social network for arts and entertainment, in which he referred to himself
4 again as "Tony." Brice/Tony acknowledges, "He was hit hard with the reality of his failure and
5 the increasing pain being slandered in the media and on the Internet." Although Brice/Tony also
6 acknowledges "he was directly responsible for his decisions," Brice/Tony was apparently more
7 upset because he felt "there was a mean-spirited attack of information that was not true, written on
8 the Internet about him, from people who never met him nor had any dealings with him."²
9 Brice/Tony then placed a post on www.fortalent.com that he was "Interested In: Performing,
10 Agency Representation, Connecting to Other Performers."

11 **About Religious books**

11  Share

12 Tony was convicted of tax evasion and wire fraud in
13 2009 and sentenced to four years in federal prison.
14 The time he spent waiting for sentencing from 2007 -
15 2009 he began to strengthen his walk with God. That
16 two year waiting period gave him the time to see
17 where he went wrong. He was hit hard with the reality
18 of his failure and the increasing pain being slandered
19 in the media and on the Internet. Although he was
20 directly responsible for his decisions, there was also a
21 mean-spirited attack of information that was not true,
22 written on the Internet about him, from people who
23 never even met him nor had any dealings with him.

- 24 ■ **Interested In:** Performing, Agency Representation,
25 Connecting to Other Performers
- 26 ■ **Category:** Music, Film / Theater / TV, Fashion,
27 Visual Arts, Performing Arts, Writing,
28 Representation, Venues, General

29 **Website:**

- 30 ■ <http://www.behindthefaith.net/>

31 *Online Source:* <https://www.fortalent.com/foambrand56/>.


32 44. Brice Carrington, Inmate Number 14020-111, is released on *Friday the 13th* of
33 September 2013, according to the Federal Bureau of Prisons website.

34
35
36
37
38 ² On December 28, 2009, Randy Sue Pollock files "Defendant's Sentencing Memorandum" – *United States v. Carrington*, CR09-0791 DLJ, Doc. 10, (N.D. Cal., 2009) – in which she (ironically) predicts: "Mr. Carrington is young and hopefully he will gain added skills in prison that will benefit him when he is released." (Emphasis added.)



Find an inmate.

Locate the whereabouts of a federal inmate incarcerated from 1982 to the present.

Find By Number		Find By Name	
Type of Number	Number		
BOP Register Numl	14020111	<input type="button" value="Search"/>	
Result using number 14020111		<input type="button" value="Clear Form"/>	
		BRICE CARRINGTON	
Register Number: 14020-111		Related Links	
Age: 53		Call or email	
Race: Black		Send mail/package	
Sex: Male		Send money	
		Visit	
		Voice a concern	
Released On: 09/13/2013			

Online Source: <http://www.bop.gov/inmateloc/>.

C. HIS NAME IS DR. ANTONIO M. WILSON.

45. WHILE STILL INCARCERATED AT A FEDERAL PRISON after pleading **GUILTY** to defrauding investors of \$4 million via an investment scheme, Brice Carrington (f/k/a Tony Wilson) begins creating an *online* presence with a new name and a new occupation needed to perpetrate the new con. Tony Wilson the NFL player begot Brice Carrington the Academy Award-winning sound producer begot Dr. Antonio M. Wilson the Oxford-educated Bible scholar.³

46. In May 2013, five months before Brice Carrington is released from prison, Dr. Antonio M. Wilson joins Twitter and begins Tweeting as: @amariotw.

³ According to an article by Deandra Shuler that was posted *online* on August 13, 2009 in Lipstick Alley, “Born Antonio Mariot Wilson, he legally changed his name in the 1990s to Brice Carrington.” If true, then it is unknown if Brice Carrington – at anytime after he was convicted – ever legally changed his name again (either back to **THE NAME HE WAS GIVEN AT BIRTH, “ANTONIO MARIOT WILSON,”** or to any other name), or if his name is still legally Brice Carrington. (Emphasis added.) Online Source: <http://www.lipstickalley.com/showthread.php/198319-Brice-carrington-he-s-a-fake%21?highlight=brice+carrington>.



Dr Antonio M Wilson

@amariotw

Author, Behind The Faith
Series.Speaker/Lecturer on Salvation,
Revelation & Biblical Antiquity

📍 Beverly Hills, CA

🌐 behindthefait.net

📅 Joined May 2013

Online Source: <https://twitter.com/amariotw>.

47. On May 22, 2013, while still serving time for pleading guilty to five (5) counts of wire fraud and four (4) counts of tax evasion for having defrauded at least ten (10) investors out of about \$4 million, Brice Carrington's new fraudulent persona, Dr. Antonio M. Wilson, releases *Behind the Faith: REVELATION* on Kindle.

48. Brice Carrington/Dr. Antonio Wilson found time to write *Behind The Faith: REVELATION* while he was serving time Behind The Bars.



Dr Antonio M Wilson @amariotw

22 May 2013

Just released Behind The Faith Revelation on Kind'e. Check it out.



👤 📷 ❤️ ...



Online Source: <https://mobile.twitter.com/amariotw>.

49. On July 26, 2013, two months later, Antonio M. Wilson creates the *online* profile Antonio M. Wilson - Google+:



Antonio M. Wilson is a man who's life has been a whirlwind of success and failure, accomplishment and defeat. Through all of his experiences God has been in the forefront leading and guiding him along a path that has lead to the writing of the book *Behind the Faith Revelation*. Antonio (Tony) grew up in the church. Tony has over 30 years of formal education in Biblical Studies. A biblical researcher on Apocalyptic scripture and writings of Antiquity. Tony has provided discourses as part of the Graduate archive at the University of Oxford at St. Peters College and Christ Church. Most recently he is the author of *Behind the Faith Revelation* available at Amazon.com

Other writings by Antonio include, *Types of Prayer*, *Advanced Citizenship - When salvation perfected*, *Angels and Demons*, *The Great White Throne*, *The Trinity* and more...

From early on God has had His hand in Tony's life. He was raised in Gardena, California by a single mom who struggled to keep her children from falling into the statistics of black youths in Los Angeles. His mom raised her children with a strong foundation in God, and also decided that he would have a better chance avoiding the Los Angeles gangs by joining the military. After serving 12 years in the Navy and receiving an Honorable Discharge.

Tony created the state of the art sound library "Ultimate FX" which was distributed by BMG/Killertracks. This library was the first surround sound library endorsed by Dolby Labs in 2005. Tony went on to create the "Ultimate FX Mixer" a consumer-based sound editing software which was distributed by Pinnacle Systems within their Video Editing Software "Studio". Tony created and produced the television series "More Than Entertainment" which aired on NBC and Fox Family, other shows followed such as *Prodigy Evolution & Preacher Man*, produced for Buena Vista Television (Disney), *The Prophet and Harbinger*, produced for Stars Cable Television.

Online Source: <https://plus.google.com/106176915849500056588>.

50. During his incarceration, Brice Carrington (a/k/a Tony Wilson, a/k/a Dr. Antonio M. Wilson) spends his time "address[ing] some hard questions of why Christians believe what they believe and what is the basis of the faith" in his writings.

51. On December 31, 2013, while on probation, Dr. Antonio M. Wilson's 470-page self-published book, *Behind The Faith: REVELATION*, becomes available for sale in paperback.

From the Inside Flap

I grew up in a traditional Baptist Church in North America and later in the Evangelical Church. **My mother and father worked for over 20 years in two separate large churches in Los Angeles both with over 20,000 members.** Over a 40 year period in my travels to churches around the country the more I learned about the working of the church and the people behind them, I grew increasingly frustrated with the true lack of sincerity and outright manipulation of the parishioners by the clergy. In the evangelical churches many are autonomous and seemed to act as a personal wallet for the pastors who seem to keep score by the material wealth and possessions they amassed.

In my University studies and attendance at the Anglican Churches or Church of England, their dynamics are somewhat different but no less contrived. There seem to be little depth in the teaching that all seem to circle back to the plights of the people and the need for the pulpit to encourage the people to give more to the church in order for God to bless them through their adversity.

One day I was asked a question, who is God and why do I believe what I believe about Him? The only answer I could come up with was more of a cliché than a real answer to such a meaningful question.

Behind the Faith is an effort to answer these questions about things I never learned through the traditional church and pastoral teaching. It is my hope that this writing will help answer some questions for all those who have some of the same questions explored in this book. This work was done the old fashioned way, written in longhand and researched directly through the scriptures and other writings of antiquity alone. **I have had some experiences with demonic deliverances, having attended a few exorcisms and casting real demons out of people myself, all of that good stuff is chronicled in this book written from first hand knowledge and not some theoretical perspective.**

There are many people who have aided me in this work, from my professors to dear friends who took the time to read my scribble and give guidance where they could. Thanks to those who were there for me during my struggles and disappointments, which in part propelled this work.

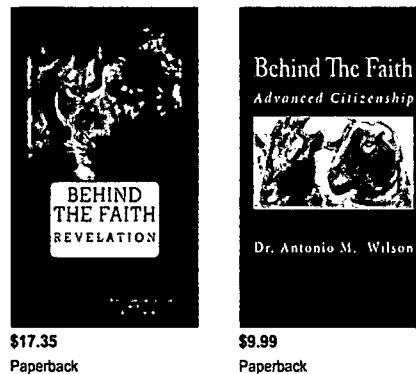
To you all the words thank you are inadequate, but I offer my thanks anyway. May these words and lessons within this discourse be a tribute to the research and inspiration that accompanied it. Though it is an imperfect work, my prayer for all that read it is that this be a blessing to you.

For [my children] Bailey and Jordan (Emphasis added.)

Online Source: <https://www.amazon.com/Behind-Faith-REVELATION-Antonio-Wilson-ebook/dp/B00CU4SNRG-nav-subnav>.

52. On February 1, 2014, one month after the paperback of Dr. Wilson's self-published *Behind The Faith: REVELATION* is released, Dr. Wilson self-publishes a 133-page sequel, *Behind The Faith: ADVANCED CITIZENSHIP*.

53. Dr. Wilson's biography, along with his photograph, and copies of the covers of both his books, can be found on Amazon.



Online Source: https://www.amazon.com/Antonio-Wilson/e/B00D1RFHGG/ref=ntt_dp_epwbk_0.

54. According to the HOME page at www.BehindTheFaith.net, "*Behind The Faith* is a book series written by Dr. Antonio M. Wilson; the series surrounds the Apocalypse, Angels, Demons and the interactions of these spirits with mankind. *Behind The Faith* addresses subjects rarely discussed by the clergy. The series is based in large part on writings by Tony for the University of Oxford in England."

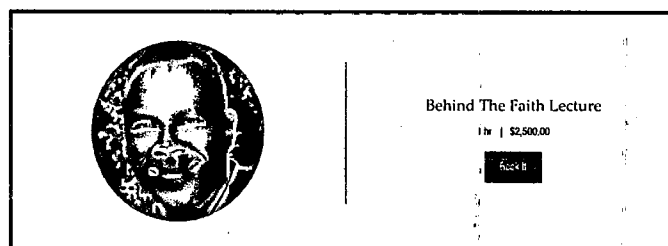
55. In addition to the "HOME" page, there are four other tabs for the *online* user to select: BIO | Book Online | AUDIO ARCHIVES | MORE STUFF.



BEHIND THE FAITH

Online Source: <http://www.behindthefait.net/>.

56. Under the "Book Online" tab, one can "Book Dr. Wilson to speak at your event, his lectures principle focus on the Book of Revelation and subject within the *Behind The Faith* Series. you [sic] can book Dr. Wilson for individual sessions or a series lecture." Dr. Wilson's speaking fee for one hour is \$2,500.00.



Online Source: <http://www.behindthefait.net/book-online>.

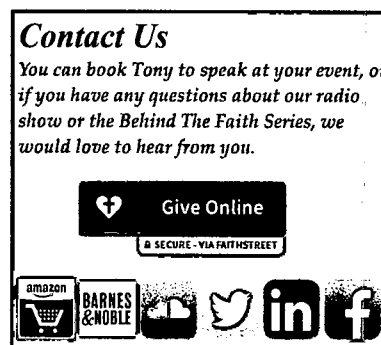
1
2 57. Under the "AUDIO ARCHIVES" tab, one can listen to broadcasts that were
3 "created during a lecture series for the University of Oxford archives and are part of
4 the development process for books written by Dr. Antonio M. Wilson, we hope you enjoy them.
5 Please like us on Facebook and connect with us on LinkedIn."



These broadcast were created during a lecture series for the University of Oxford archives and are part of the development process for books written by Dr. Antonio M. Wilson, we hope you enjoy them, Please like us on Facebook and connect with us on LinkedIn

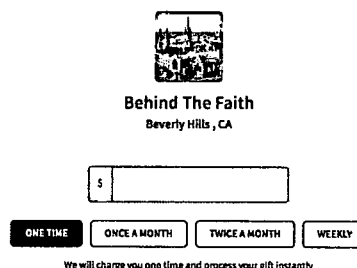
Online Source: <http://www.behindthefaitn.net/archives>.

9 58. There are four subcategories under the "MORE STUFF" tab: DIGS,
10 TESTIMONIALS, CONTACT, and SNEAK PEAK [sic]. Under the "CONTACT" tab, "You can
11 book Tony to speak at your event, or if you have any questions about our radio show or the *Behind*
12 *The Faith* Series, we would love to hear from you." It also allows one to GIVE ONLINE,
13 securely, via FAITHSTREET, by clicking on the GIVE ONLINE link.



20 Online Source: <http://www.behindthefaitn.net/form>.

21 59. Clicking on the GIVE ONLINE link will take the user to an *online* page that allows
22 a donation to be given either one time, once a month, twice a month, or weekly.



28 Online Source: <https://www.faitnstreet.com/church/behind-the-faitn-beverly-hills-ca/giving>.

01/06/2017

60. According to Dr. Wilson's LinkedIn profile, under Publications, he has also authored of two other books, *Christianity – The Holy Trinity Controversy*, published in 2009 by Millennium House, and *Biblica – The Revelation of John*, published in 2006 by Global Book Publishing.

Christianity - The Holy Trinity Controversy

Millennium House
2009

Contributor - Christianity - The Holy Trinity Controversy, Millennium House, Oxford Press -
<http://www.millenniumhouse.com.au/title-christianity.html>

Authors: Dr. Antonio M. Wilson, DPhil Theology

Biblica - The Revelation of John

Global Book Publishing
2006

Contributor - "Biblica" - The Revelation of John - Global Book Publishing - 2006
<http://www.amazon.com/Biblica-Bible-Barry-J-Beitzel/dp/1845378849>

Authors: Dr. Antonio M. Wilson, DPhil Theology

Online Source: <https://www.linkedin.com/in/antoniomwilson>.

61. In October 2016, the following information was found *online* by simply Googling his name: Dr. Antonio M. Wilson.

Search Results

Dr. Antonio M. Wilson, DPhil Theology | LinkedIn

<https://www.linkedin.com/in/antoniomwilson>

Beverly Hills, California - Author of "Behind The Faith" ■ Speaker ■ Lecturer ■ Research Writer Biblical Antiquity

View *Dr. Antonio M. Wilson*, DPhil Theology's professional profile on LinkedIn. LinkedIn is the world's largest business network, helping professionals like Dr.

Dr. Antonio M Wilson - Author Beverly Hills, CA - GigMasters

www.gigmasters.com › Author › California Authors › Beverly Hills Authors
GigMasters

Tony is a research writer and lecturer for the University of Oxford in England, he is the author of the book series Behind The Faith, the series surrounds...

Dr Antonio M Wilson (@amariotw) | Twitter

<https://twitter.com/amariotw>

The latest Tweets from *Dr Antonio M Wilson (@amariotw)*. Author, Behind The Faith Series.Speaker/Lecturer on Salvation, Revelation & Biblical Antiquity.

Amazon.com: Antonio M. Wilson: Books, Biography, Blog, Audiobooks ...

<https://www.amazon.com/Antonio-M.-Wilson/e/B00IDEZDJ8>

Amazon.com, Inc.

\$9.99. Paperback. Books by Antonio M. Wilson ... Apr 9, 2014. by *Dr. Antonio M. Wilson* ...
See search results for author "Antonio M. Wilson" in Books ...

Dr. Antonio M Wilson on Blogger

drantoniomwilson.blogspot.com/

01/06/2017

May 12, 2016 - Based in Beverly Hills, California, *Dr. Antonio M. Wilson* serves as a research writer for the University of Oxford in England. In his scholarly ...

Dr. Antonio M Wilson - Beverly Hills, California, University of Oxford ...

<https://about.me/drantoniomwilson>

A researcher and writer at the University of Oxford since 2009, *Dr. Antonio M. Wilson* composes research papers for Oxford's graduate archives and creates ...

Behind The Faith with Antonio M Wilson

www.behindthefait.net/

Behind The Faith is a book series written by *Dr. Antonio M. Wilson*; the series surrounds the Apocalypse, Angels, Demons and the interactions of these spirits ...

Dr Antonio M. Wilson | Facebook

<https://www.facebook.com/pages/Dr-Antonio-M-Wilson/325005020980319>

Portions of bibliographic data on books is copyrighted by Ingram Book Group Inc. Want to like this Page? Sign up for Facebook to get started. Sign Up.

Antonio M Wilson Profiles | Facebook

<https://www.facebook.com/public/Antonio-M-Wilson>

[Translate this page](#)

Facebook

Join Facebook to connect with *Antonio M Wilson* and others you may know. Facebook gives ... *Wilson-m Wilson-m. Universidade Dr Antonio Agostinho neto.*

Dr. Antonio M. Wilson, Accomplished Author of Christian Theology Texts

www.drantoniomwilson.com/

An academic and author focused on Christian history and biblical interpretation, *Dr. Antonio M. Wilson* supports University of Oxford theology students by writing ...

Online Source: <https://www.google.com/#q=Dr.+Antonio+M.+Wilson>.

62. In his LinkedIn profile, Dr. Wilson represents that his formal education began when he earned a Bachelor of Arts (BA) from National University (1981-1984). The profile claims he then received a Masters of Theology from the University of Oxford at St. Peter's College (1994-1997), and then rounded out his education by obtaining a Doctorate of Philosophy in Theology from the University of Oxford at Christ Church (2005-2009) – All in England, U.K.

Education

University of Oxford at Christ Church

Doctorate of Philosophy in Theology
2005 – 2009

University of Oxford at St. Peter's College

Masters of Theology
1994 – 1997

National University

Bachelor of Arts (B.A.)
1981 – 1984

Online Source: <https://www.linkedin.com/in/antoniomwilson>.

63. While the *online* representation of his formal education on LinkedIn states that Dr. Wilson is a two-time graduate from the University of Oxford, his *online* LinkedIn resume represents that Dr. Wilson is also employed by the University of Oxford. "Dr. Antonio M. Wilson works for the University of Oxford as a research writer on Biblical matters." His *online* resume not only states directly under his name that he is "Committed to Biblical Research," but also cites examples of his scholarly background. "Dr. Antonio M. Wilson's scholarly background includes a period supporting the Institute of Archeology [sic] at the Hebrew University of Jerusalem while it conducted an investigation of a site more ancient than the Wailing Wall."

Dr. Antonio M Wilson

Dr. Antonio M. Wilson - Committed to Biblical Research

Based in Beverly Hills, California, Dr. Antonio M. Wilson works for the University of Oxford as a research writer on Biblical matters. The position requires that he produce research documents that can help graduate theology students as they pursue their studies. Dr. Antonio M. Wilson's scholarly background includes a period supporting the Institute of Archeology at the Hebrew University of Jerusalem while it conducted an investigation of a site more ancient than the Wailing Wall.

Complementing his work for the University of Oxford, Dr. Antonio M. Wilson produces books and other commentaries regarding important Christian issues. For instance, he authored the Behind the Faith book series, which includes two publications. The first concerns the Book of Revelation and the second discusses advanced citizenship.

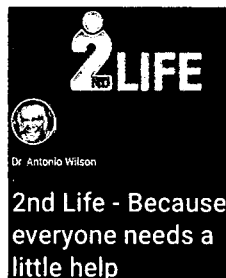
Recently, Dr. Wilson developed an application called A 2nd Life that helps people seeking social services linked to general relief, housing and nutrition. The 2nd Life app provides simple-to-understand, animated walkthroughs that teach people about the social services application process. Online at www.a2nd.life

Address: Beverly Hills, CA, US

Email: Dr2ndLife@gmail.com

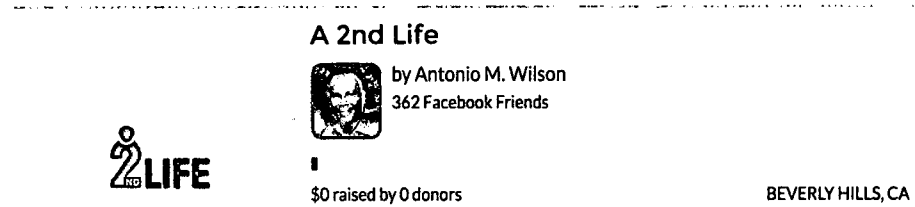
Online Source: <https://www.resumonk.com/SGpJeuJuWxNDyS9Ngfwl4w>.

64. As Dr. Antonio M. Wilson's *online* resume explains, "Recently, Dr. Wilson developed an application called 'A 2nd Life' that helps people seeking social services linked to general relief, housing and nutrition. The 2nd Life app provides simple-to-understand animated walkthroughs that teach people about the social service application process. Online at www.a2nd.life."



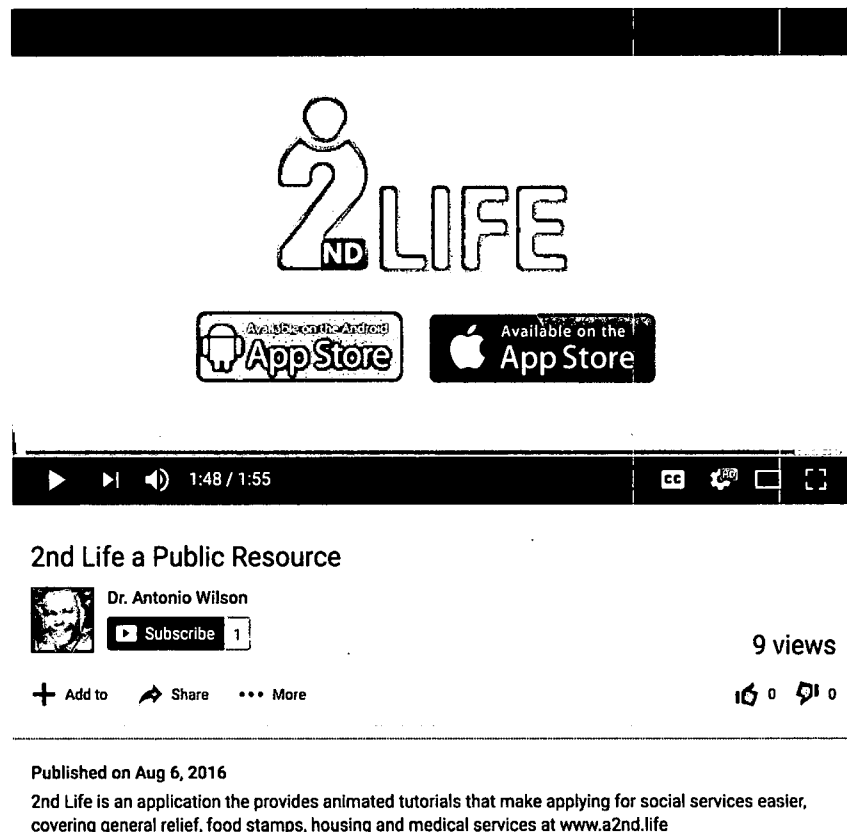
Online Source: <https://plus.google.com/collection/gyFObB>.

65. The tagline for The 2nd Life app is "Because everyone needs a little help." Apparently Dr. Antonio Wilson himself needed "a little help" raising capital for his do-good app, because he started an *online* funding campaign at gofundme.com.



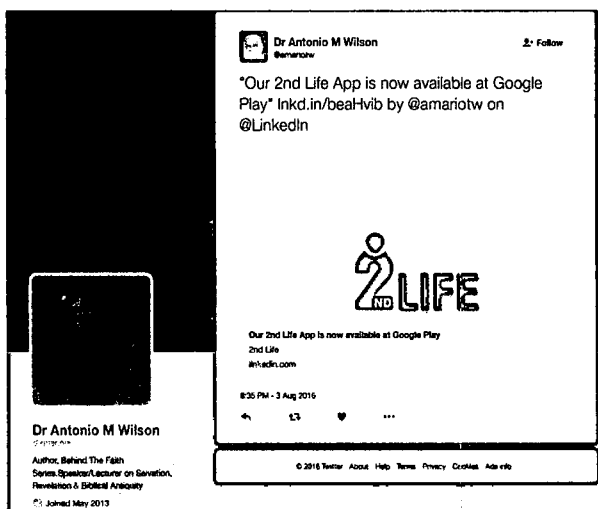
Online Source: <https://www.gofundme.com/mvc.php?route=search&term=Antonio M Wilson>.

66. Dr. Wilson markets his "A 2nd Life" App *online* through YouTube and the Apple Store, claiming "2nd Life is an application the [sic] provides animated tutorials that make applying for social services easier, covering general relief, food stamps, housing and medical services at www.a2nd.life."



Online Source: <https://www.youtube.com/watch?v=CAEERxBPYco>.

67. Dr. Wilson markets his "A 2nd Life" App *online* through Twitter and Google Play.



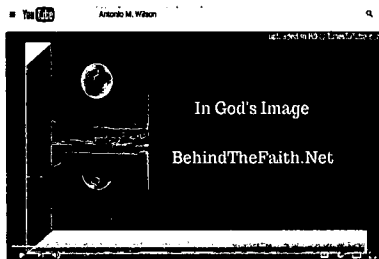
Online Source: <https://twitter.com/amariotw/status/761042762980405249>.

68. In his LinkedIn profile, all of Dr. Wilson's podcasts are visually depicted.



Online Source: <https://www.linkedin.com/today/author/antoniomwilson?trk=prof-sm>.

69. Dr. Wilson posted his April 21, 2015, podcast *In God's Image* on YouTube.



Online Source: <https://www.youtube.com/watch?v=kP3KzAPiZTM>.

70. In his LinkedIn profile, Dr. Antonio M. Wilson represents that he is a National Exercise & Sports Trainers Association (NESTA) **Certified Master Personal Trainer.**"

Certifications

NESTA Certified Master Personal Trainer - Cert No N65535581 ▶
National Exercise & Sports Training Association (NESTA), License N65535581
November 2014 – November 2018

Online Source: <https://www.linkedin.com/in/antoniomwilson>.

71. According to NESTA, the difference between a **Certified Personal Trainer** and a **Certified Master Personal Trainer** is that NESTA's **Master** Trainer program is an advanced personal trainer certification option that includes four specializations: (1) biomechanics specialist (BMS); (2) functional training specialist (FTS); (3) core conditioning specialist (CCS); and, (4) speed, agility & quickness specialist (SAQ). In addition, it includes a polar watch.

Online Source: <http://pftinfocenter.com/best-personal-trainer-certifications/nesta-personal-trainer-certification/>.

72. According to NESTA, Antonio M. Wilson is only a **Certified Personal Trainer**, **NOT** a **Certified Master Personal Trainer**.

Search Results for **n65535581**

Certificate Number	Student	Certification	Issued Date	Expiration Date
N65535581	Antonio M. Wilson	NESTA-PFT	11/09/2014	11/09/2018
To ensure public safety and ethical practices the National Exercise & Sports Trainers Association provides NESTA-PFT certification verification. This feature allows interested parties, including the general public, to look up and verify an NESTA-PFT Certified Personal Trainer credential. Each individual who possesses a NESTA-PFT Certified Personal Trainer credential can be accessed here by providing their certification number.				

Online Source: <http://pft.nestacertified.com/pft-grad-search/>.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

II.

BEHIND THE CON:

LA FITNESS KNOWINGLY & INTENTIONALLY PROVIDES ITS
CONVICTED-FELON-CON-ARTIST CLUB MANAGER
WITH THE PERFECT OPPORTUNITY TO CON ITS MEMBERS

73. LA Fitness knew about Tony/Brice/Antonio's extensive criminal career spanning the past quarter-century – *as well as his current con* – BEFORE hiring him as a Club Manager. The cited news articles, public Felony Records, and computer screenshots that attest to Tony's convictions, Brice's incarceration, and Antonio's current con are all found online WITHOUT the benefit of knowing the LA Fitness Club Manager's social security number and/or his date of birth. If the above can be found by *simply searching online*, then the details that LA Fitness found online WITH the benefit of knowing Tony/Brice/Antonio's social security number and/or his date of birth BEFORE hiring its current Club Manager must be as abundant as they are immoral.⁴

74. LA Fitness knows of Tony/Brice/Antonio's extensive criminal career spanning the past quarter-century – *as well as his current con* – because DURING his tenure as a Club Manager, at least one member has informed LA Fitness that its current Club Manager is a Convicted-Felon-Con-Artist. The way that the LA Fitness member found out that the LA Fitness Club Manager is a Convicted-Felon-Con-Artist was by *simply searching online*. Unfortunately, the LA Fitness member only learned of LA Fitness employing a Club Manager who is a

⁴ Evidence that LA Fitness having a pattern and practice of knowingly hiring convicted felons, with the blessing of its corporate office, can be found by *simply searching online*. One such example is a November 14, 2012 article in *CLUB INDUSTRY* titled "The LA Fitness Janitor Who Was A Bank Robber," which reported that Michael "Webb" was hired by LA Fitness in 2008, but *he went to jail for several months for a domestic battery charge* that was later dismissed. Upon his release in 2010, the club's [Facility Director], Sean Lynch, hired him again with the blessing of the corporate office. But Webb had had a lot of legal issues in his life. He served 3½ years in Florida state prison after he was arrested in 1986 on a second-degree attempted murder charge, the *Sun-Sentinel* reported. He then robbed 11 South Florida banks over a seven-month period in 1989 and 1990. The "Bandanna Bandit" took in more than \$100,000. On Nov. 2, just four days after Webb received his promotion, he tried to rob a bank in Pompano Beach, FL." When the reporter, Stuart Goldman, "asked LA Fitness about Webb and whether or not the company conducted a background check on him upon his hiring," LA Fitness sent him an email saying, "We don't have a comment on this ongoing investigation at this time." (Emphasis added.) Online Source: <http://clubindustry.com/blog/la-fitness-janitor-who-was-bank-robber>.

1 Convicted-Felon-Con-Artist after the LA Fitness member was swindled out of more than
2 \$50,000.00 by the LA Fitness Convicted-Felon-Con-Artist Club Manager.

3
4 75. LA Fitness knows of Tony/Brice/Antonio's criminal career spanning the past
5 quarter-century – *as well as his current con* – because AFTER being swindled out of more than
6 \$50,000.00, the LA Fitness member successfully obtains a Temporary Restraining Order (TRO)
7 against the LA Fitness Convicted-Felon-Con-Artist Club Manager. Then, the LA Fitness member
8 not only has two armed LAPD officers serve the TRO on the LA Fitness Club Manager while he is
9 working at the LA Fitness facility, but the two armed LAPD officers serve the TRO on the LA
10 Fitness Club Manager while LA Fitness Facility Director Tim Caballero witnesses.

11 76. LA Fitness knows of Tony/Brice/Antonio's criminal career – *as well as his current*
12 *con* – because AFTER witnessing a TRO being served on his Club Manager by two armed LAPD
13 officers, and after again being informed that an LA Fitness member was just swindled out of more
14 than \$50,000.00 by his Club Manager who is a Convicted-Felon-Con-Artist who was just served
15 with a TRO, LA Fitness Facility Director Tim Caballero protects and defends his LA Fitness
16 employee. Instead of showing care or compassion to the LA Fitness member, LA Fitness Facility
17 Director Tim Caballero asks that she stop “making accusations.” LA Fitness Facility Director Tim
18 Caballero then advises the member/victim/whistleblower that she should not go to “this [LA
19 Fitness facility] location anymore.”

20 77. Admitting that LA Fitness is fully aware of Tony/Brice/Antonio's criminal career –
21 *as well as his current con* – LA Fitness Facility Director Tim Caballero provides an email to the
22 LA Fitness Convicted-Felon-Con-Artist Club Manager with the intent that the email be used – and
23 is used – as evidence that the LA Fitness member is “wrongfully attempt[ing] to have [him] fired
24 from his job.”

25 78. LA Fitness Facility Director Tim Caballero's email is indisputable evidence of LA
26 Fitness' collusion with LA Fitness Club Manager to perpetrate the con on its member and to cause
27 her damage.
28

1
2 79. LA Fitness Facility Director Tim Caballero wrote his email so that it would be
3 submitted to the Court. The purpose of the email was twofold: (1) To undermine and humiliate its
4 member; and, (2) To give evidence for the Court to *DENY* its member's request that a Permanent
5 Restraining Order be issued against the LA Fitness Convicted-Felon-Con-Artist Club Manager –
6 who had just swindled her out of more than \$50,000.00.⁵

7 80. LA Fitness knows who Tony/Brice/Antonio is, just as Tony/Brice/Antonio knows
8 who all of LA Fitness' members are. But while LA Fitness knows who Tony/Brice/Antonio is,
9 and Tony/Brice/Antonio knows who LA Fitness' members are, LA Fitness members only know
10 Tony/Brice/Antonio as simply "Antonio W." – Club Manager, Personal Training.

11 Club Managers

- 12 ● Member Service

13 [REDACTED]

- 14 ● Fitness Sales

15 [REDACTED]

- 16 ● Personal Training

17 **Antonio W.**

18
19 *Online Source:* <https://www.lafitness.com/Pages/clubhome.aspx?clubid=821>.

20 81. LA Fitness premeditatedly and purposefully provides Convicted-Felon-Con-Artist
21 Tony/Brice/Antonio with the perfect camouflage – LA Fitness Club Manager Antonio W. LA
22 Fitness does so in order that he has an ever-replenishing stream of LA Fitness members/victims to
23 swindle – because apparently swindling one LA Fitness member out of more than \$50,000.00 isn't
24 enough.

25
26 ⁵ In the "JUDGMENT IN A CRIMINAL CASE," – *United States v. Carrington*, CR09-0791 DLJ, Doc. 14, (N.D.
27 Cal., 2009) – under the section "SPECIAL CONDITIONS OF SUPERVISION": "The Court orders restitution in the
28 amounts of \$3,992,480.00 to victims and \$141,987.00 to the IRS for a total amount of restitution of **\$4,134,377.00**
which is due immediately and is to be paid to the victims first, in proportion to the amount of loss suffered.
Remaining amounts of restitution owed upon release from prison is to be paid at such times and in such
amounts as directed by the probation officer, as a condition of supervised release." (Emphasis added.)

1 A. **"JENIFER, THIS IS TONY, FROM LA FITNESS, MY DEAR."**

2 82. Dr. Antonio M. Wilson, or, as he is known at LA Fitness, **Antonio W**, leaves the
3 following message on an LA Fitness member's voicemail:
4

5 Jenifer, **this is Tony, from LA Fitness, my Dear.** How are you? I'm sorry I
6 missed you. I was out the last couple of days doing my Navy reserves stuff,
7 so, sorry I haven't been able to call you back as soon as you did. Anyways,
8 I'm back. Call me when you get a chance. Hope to hear from you. Hope
9 you're doing well. Looking forward to seeing you and talking to you soon.
10 (Emphasis added.)

11 83. LA Fitness Club Manager Antonio W knew exactly who "Jenifer" was. As LA
12 Fitness' Club Manager, Antonio W has access to all LA Fitness' members' information.

13 84. What Antonio W cannot find out about "Jenifer" from the LA Fitness files to which
14 he has access, he finds by *simply searching online*, just as LA Fitness found out who
15 "Tony/Brice/Antonio" is by *simply searching online*.

16 85. "Jenifer" is Jenifer Lewis, the award-winning actress, singer and social activist.

17 86. Just as LA Fitness knows about Tony/Brice/Antonio's extensive criminal career
18 spanning the past quarter-century – *as well as his current con* – *which it learned by simply*
19 *searching online **BEFORE*** hiring him, LA Fitness Club Manager Antonio W knows about Jenifer
20 Lewis' acting and activist career over the past quarter-century – *as well as her current role* on
21 prime time network television – *which he learned by simply searching online **BEFORE***
22 approaching her.

23 87. Jenifer Lewis joins LA Fitness in March 2015. She exclusively utilizes the facility
24 located on Sepulveda Boulevard in Van Nuys, California.

25 88. Tim Caballero is the Facility Director at the LA Fitness location that is located on
26 Sepulveda Boulevard in Van Nuys, California, the facility that Jenifer Lewis utilizes exclusively.
27 LA Fitness Facility Director Tim Caballero supervises all Club Managers at the LA Fitness facility
28 in Van Nuys, including, but not limited to, LA Fitness Club Manager Antonio W.

///

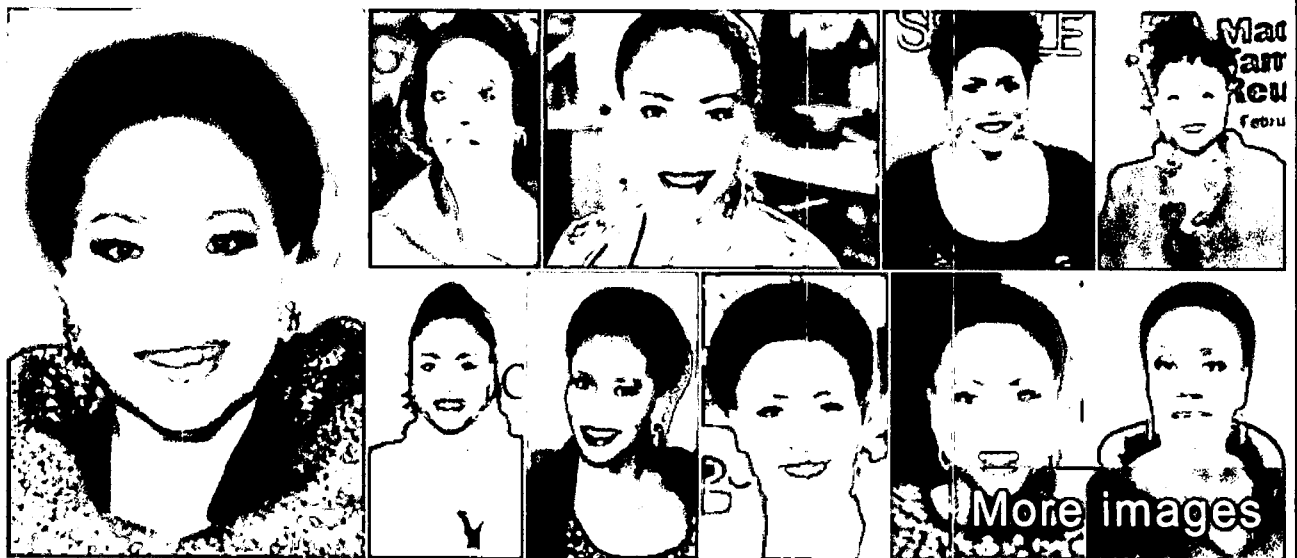
///

1 89. LA Fitness member Jenifer Lewis brings her four (4) young great-nephews to play
2 at the facility's Kids Klub – LA Fitness' play area – while she works out. Because LA Fitness
3 Club Manager Antonio W's desk sits next to Kids Klub, he knows when she is in the facility.

4 90. LA Fitness Club Manager Antonio W approaches LA Fitness member Jenifer Lewis
5 while she is working out.

6 91. Before introducing himself, he already knows myriad details about her. He knows
7 that LA Fitness member Jenifer Lewis loves children and adopted her daughter through the Big
8 Brothers/Big Sisters program. He knows that she was previously engaged to a career Marine. He
9 knows her favorite movie star is Cary Grant.

10 92. When LA Fitness Club Manager Antonio W tells her that he likes her hair, not only
11 does he already know that LA Fitness member Jenifer Lewis is on record about how proud she is
12 of her decision to wear natural hairstyles on and off-screen, but he has already seen her various
13 hairstyles in photographs that appear *online*.



24 **Jenifer Lewis**

25 **Actress**



26
27 *Online Source:* <https://www.google.com/search?client=safari&rls=en&q=Confirm+my+account&ie=UTF-8&oe=UTF-8-q=jenifer+lewis&start=0>
28

01/06/2017

1 93. When LA Fitness Club Manager Antonio W approaches LA Fitness member Jenifer
2 Lewis, he already knows her personality profile.

3 94. When LA Fitness Club Manager Antonio W approaches LA Fitness member Jenifer
4 Lewis, he already knows her professional 'Biography,' as it is published *online* on IMDb:
5

6 **Mini Bio (1)**

7 Jenifer Lewis Jenifer Lewis is one of Hollywood's most familiar faces, with more than 300
8 appearances in film and television. Dubbed a "national treasure" by TV Guide.com, Jenifer
9 currently stars on the hit show Black-ish (ABC), where her hilarious portrayal of "Ruby
10 Johnson" earned her a nomination for the 2016 Critics Choice Award. Jenifer's most
11 recent movies include The Wedding Ringer, Think Like A Man, Think Like A Man Too and
12 Baggage Claim. She delivered legendary performances as Tina Turner's mother in What's
13 Love Got to Do With It and in The Preacher's Wife as the mother of Whitney Houston's
14 character. Jenifer starred opposite Matt Damon in Clint Eastwood's Hereafter and for
15 director Tyler Perry, Jenifer created unforgettable characters in Madea's Family Reunion
16 and Meet the Browns. In the movie Castaway, Jenifer portrayed Tom Hanks' boss. In
17 animated films, Jenifer's uniquely recognizable voice is adored by Disney fans worldwide
18 in roles such as "Flo" in Cars and Cars 2 and as "Mama Odie" in The Princess and the
19 Frog. Jenifer's TV roles have ranged from regular appearances as "Aunt Helen" on The
20 Fresh Prince of Bel-Air to guest star roles on Friends, Boston Legal and Girlfriends. For six
21 seasons, Jenifer portrayed "Lana Hawkins" on Lifetime's hit series Strong Medicine.
22 Although best known for her Hollywood success, Jenifer has enjoyed a wide-ranging and
23 varied career in music and theater. Jenifer has performed in four Broadway shows,
24 including Hairspray in the role of "Motormouth Mable." In 2014, she received an
25 electrifying standing ovation at Carnegie Hall when she sang with the New York Pops
26 orchestra. All told, Jenifer has presented more than 200 concerts, performing in 49 states
27 and on four continents. Jenifer was born and raised in Kinloch, Missouri. Her
28 accomplishments as an entertainer and community activist have been recognized with an
honorary doctorate from her alma mater, Webster University in St. Louis and by the
American Black Film Festival's Career Achievement Award.

Online Source: http://www.imdb.com/name/nm0507338/bio?ref=nm_ov_bio_sm.

95. When LA Fitness Club Manager Antonio W approaches LA Fitness member Jenifer
Lewis, he already knows that she plays "Ruby Johnson," the sassy but lovable grandma on ABC's
hit series 'black-ish'.

///

///

///



Online Source: <http://hitshowstowatch.com/blackish-season-3-episode-5-the-purge/>.

96. LA Fitness Club Manager Antonio W falsely tells LA Fitness member Jenifer Lewis that he is divorced, that he has a Ph.D. from Oxford University in England, and that the only reason he works at LA Fitness is so he can help save lives because he had to kill so many people as a Navy SEAL. LA Fitness Club Manager Antonio W falsely presents himself as a deeply religious man.

97. Following the initial meeting, whenever LA Fitness member Jenifer Lewis works out at LA Fitness, LA Fitness Club Manager Antonio W seeks her out on the pretext of wanting to train her. He falsely represents that as LA Fitness' Club Manager of Personal Training, he is a **Certified Master Personal Trainer**. The fact that he has the additional knowledge that is required for one to be a **Certified Master Personal Trainer**, as opposed to a Certified Personal Trainer, influences her decision to hire him to train her personally.

98. It is also obvious to LA Fitness member Jenifer Lewis that LA Fitness Club Manager Antonio W is in 'phenomenal' shape.⁶

⁶ Unbeknownst to LA Fitness member Jenifer Lewis, LA Fitness Club Manager Antonio W was in 'phenomenal' shape because he had ample time to work out during his four-years in federal prison; merely eighteen (18) months before meeting LA Fitness member Jenifer Lewis during the course and scope of his employment as a manager at LA Fitness (Surrender Date: February 12, 2010; Release Date: September 13, 2013). Online Source: <http://www.sfgate.com/crime/article/Fake-Oscar-winner-gets-4-years-for-fraud-3204336.php>.

1
2 99. LA Fitness Club Manager Antonio W pretends to not know who LA Fitness
3 member Jenifer Lewis is, explaining that he is unfamiliar with her work in movies and television
4 because he has spent so many years overseas fighting with the Navy SEALs and studying in
5 England. He claims emphatically, but misleadingly, that he does not want to know about her
6 acting work, as he is only interested in who she is "off-screen."

7 100. On Wednesday, April 29, 2015, while LA Fitness member Jenifer Lewis is working
8 out at LA Fitness, LA Fitness Club Manager Antonio W again seeks her out, but this time there is
9 no pretext. He asks if she would like to join him for coffee, and she accepts.

10 At 5:32 pm, he texts her that he "really enjoyed our time today...". The LA Fitness Club
11 Manager Antonio W and the LA Fitness member make plans to meet the next day at a restaurant
12 close to LA Fitness, the "Garden Café on Woodman between Ventura and Moorpark," at 12:30
13 pm.

14 With the practicalities out of the way, LA Fitness Club Manager Antonio W flirts:

15 Ok... I'll be
16 thinking about
17 you...particularly
18 those eyes☹☹

19 And those ☺

20 Thank u but easy
21 young man. ☺



22 101. LA Fitness Club Manager Antonio W's flirtation includes a sad, but untrue, story
23 about his divorce and the effect it has had on his two children, Bailey and Jordan. He confides that
24 he is worried about how he is going to support his children and keep them safe from their unstable
25 mother. He spins a tale of struggling to balance many responsibilities: as a father, he shares joint
26 custody of his two children; as a Navy SEAL, he has diver training obligations; as a professor in
27 UCLA's Department of Theology, he delivers lectures twice-weekly; as a Bible expert, he
28 contributes scholarly papers to his alma mater, Oxford University, and self-produces and self-
narrates podcasts that appear on BlogTalkRadio and soundcloud.com; and, as LA Fitness' Club
Manager–Personal Training, he supervises the personal trainers and pursues sales goals. LA

1 Fitness Club Manager Antonio W also uses these responsibilities, several of which are imaginary,
2 as the reasons why he is only able to spend time with LA Fitness member Jenifer Lewis before he
3 goes to work at LA Fitness, while he is working at LA Fitness, and when he takes his long lunch
4 breaks from his work at LA Fitness.

5
6 102. LA Fitness Club Manager Antonio W fraudulently presents himself, both in person
7 and *online*, as a deeply religious man, devoted to his children and to the betterment of humanity.
8 As proof of his compassion, he describes several "vulnerable, overweight" LA Fitness members
9 who prefer to be trained by him because he "treats them so kindly." LA Fitness member Jenifer
10 Lewis takes him at his word, believing that he is kind and that he treats people the way he said he
11 does, the way she does, the way real people do.

12 103. LA Fitness Club Manager Antonio W explains, and falsely so, to LA Fitness
13 member Jenifer Lewis that he is working at LA Fitness only because he is currently down on his
14 luck financially; just a few years earlier he had millions due to the success of his sound effects
15 invention. He deceitfully explains how he lost his millions: He was negotiating the sale of his
16 sound effects invention while simultaneously negotiating his divorce settlement. Anticipating a
17 windfall from the sale of his sound effects invention, he said that he graciously allowed his future
18 ex-wife to keep all the marital assets. But, as luck would have it, the market crashed right after the
19 divorce and right before the sale. When the buyers of his sound effects invention refused to go
20 through with the sale, LA Fitness Club Manager Antonio W was left with nothing but the "will of
21 spirit" to start all over again.

22 104. To LA Fitness member Jenifer Lewis, LA Fitness Club Manager Antonio W's story
23 seems sad, yet honorable, but entirely plausible. She sees that he presents himself as a person
24 accustomed to having money, and that he has a worldly style, and that he has all the trappings of
25 former wealth: he wears stylish suede shoes, he sports an expensive watch, he drives a Mercedes.
26 And he provides photographic evidence of his former wealth: LA Fitness Club Manager Antonio
27
28

1 W shows LA Fitness member Jenifer Lewis a photo of him standing beside his *Lamborghini*
2 *Murcielago*, with his mansion behind him.⁷

3
4 105. LA Fitness member Jenifer Lewis shares with LA Fitness Club Manager Antonio
5 W that she will not be at LA Fitness the next week or so, as she will be in her hometown of St.
6 Louis, Missouri, because on Saturday, May 9, 2015, she has been given the honor of delivering the
7 2015 Commencement Speech at her alma mater, Webster University, where she will also be
8 awarded a Doctorate of Humane Letters.

9 *Online Source:* <https://www.youtube.com/watch?v=JbylhczU38Y>.

10 106. On Saturday, May 9, 2015, LA Fitness Club Manager Antonio W sends LA Fitness
11 Jenifer Lewis a text welcoming her "to the Dr ranks," reminding her that he has a Ph.D. in
12 Theology from Oxford University in England (which, in reality, he does not).

13 Sat, May 9, 2:41 PM

14 (Thinking about
15 you/ hope you had
16 fun and welcome
17 to the Dr ranks 😊
18 looking forward to
19 seeing you when
20 your back ... Enjoy)

21 107. While LA Fitness member Jenifer Lewis is in St. Louis, her mother falls ill and is
22 hospitalized.

23 108. On information and belief, throughout his tenure, LA Fitness Club Manager
24 Antonio W, while in the course and scope of his employment, shares with and encourages LA
25 Fitness' members, staff, and management, including, but not limited to, LA Fitness Facility

26 ⁷ With the apparent blessing of LA Fitness' corporate office, LA Fitness Club Manager Antonio W was using LA
27 Fitness, and his managerial position at LA Fitness, exactly the same way that he had used his fancy cars when he was
28 Brice Carrington, the Academy Award-winning sound effects engineer – As "props used to draw new investors." Known to LA Fitness, but unbeknownst to LA Fitness member Jenifer Lewis, more than five (5) years earlier, on September 8, 2009, the *East Bay Times* posts an article titled "Former Pleasanton Investor Who Fabricated Hollywood Background Pleads Guilty," in which it was reported that "The U.S. Attorney's Office said the cars [*a Lamborghini Murcielago*, a Hummer H2 and a Mercedes-Benz SL500R] were props used to draw new investors." *Online Source:* <http://www.eastbaytimes.com/2009/09/08/former-pleasanton-investor-who-fabricated-hollywood-background-pleads-guilty/>.

1 Director Tim Caballero, to listen to his self-produced and self-narrated podcasts on
2 soundcloud.com, as well as to read his self-published books, *Behind The Faith: REVELATION* and
3 *Behind The Faith: ADVANCED CITIZENSHIP*, which he generously gives away to LA Fitness'
4 members, staff, and management, including, but not limited to, LA Fitness Facility Director Tim
5 Caballero; LA Fitness member Jenifer Lewis was also one such lucky recipient.

6
7 109. On or about Wednesday, May 13, 2015, LA Fitness Club Manager Antonio W posts
8 his most recent self-produced and self-narrated podcast on soundcloud.com.



9 Dr Antonio M Wilson @amariotw
10 Do you know the signs of demonic possessions?
11 soundcloud.com/antoniomwilson... #church #biblestudy

13 May 2015



12 *Online Source:* <https://mobile.twitter.com/amariotw>.

13 110. After returning from St. Louis, LA Fitness member Jenifer Lewis resumes her
14 workout regimen at LA Fitness, and resumes escorting her four (4) young great-nephews to and
15 from Kids Klub, walking past LA Fitness Club Manager Antonio W's desk as she does.

16 111. On Monday, May 18, 2015, LA Fitness Club Manager Antonio W leaves a message
17 on LA Fitness member Jenifer Lewis' voicemail.

18 Jenifer, ***this is Tony, from LA Fitness, my Dear.*** How are you? I'm sorry I
19 missed you. I was out the last couple of days doing my Navy reserves stuff,
20 so, sorry I haven't been able to call you back as soon as you did. Anyways,
21 I'm back. Call me when you get a chance. Hope to hear from you. Hope
22 you're doing well. Looking forward to seeing you and talking to you soon.
23 (Emphasis added.)

24 112. On Tuesday, May 19, 2015, LA Fitness Club Manager Antonio W and LA Fitness
25 member Jenifer Lewis have lunch at the Cheesecake Factory, where his pursuit continues.

26 When LA Fitness member Jenifer Lewis shares with LA Fitness Club Manager Antonio W
27 that her mother is hospitalized, he comforts her, choking up, and confiding that he still feels
28 horrible because when his mother passed, he was unable to attend her funeral.⁸ He tells her that

⁸ Dr. Antonio M. Wilson dedicated his first book, *Behind The Faith: REVELATION*, to his two children, Bailey and Jordan, and dedicated his second book, *Behind The Faith: ADVANCE CITIZENSHIP*, "To Yvetta Jean Ruff, a promised fulfilled. From your only son. You are missed." (Emphasis added.) *Online Source:* https://www.amazon.com/Antonio-Wilson/e/B00D1RFHGG/ref=ntt_dp_epwbk_0.

1 the reason he was unable to attend his mother's funeral was because he was out of the country,
2 obtaining a Doctorate of Philosophy in Theology from the University of Oxford at Christ Church.⁹
3

4 By comforting her at this moment of vulnerability, by playing on her sympathies, LA
5 Fitness Club Manager Antonio W gains an important foothold – the shared experience of an ill and
6 dying parent. In LA Fitness member Jenifer Lewis' mind, his understanding and sympathy for
7 what she is going through bonds them deeply together. She feels a connection and deep gratitude
8 for his compassion, on which she increasingly relies, as her mother grows more ill. She comes to
9 depend on his reassurances.

10 LA Fitness member Jenifer Lewis thinks, "Thank goodness I joined LA Fitness. Otherwise
11 I never would have met this compassionate, giving, handsome African-American man who went to
12 Oxford, got a doctorate in Theology and serves our country as a Navy SEAL."

13 By the time their lunch is over, she trusts him. Letting her guard down, she lets him kiss
14 her.

15 After lunch, at 2:27 pm, LA Fitness member Jenifer Lewis texts LA Fitness Club Manager
16 Antonio W that she has "never been kissed like that in her life."

Tue, May 19, 2:27 PM

I've never been
kissed like that in
my life. So yes I
meant thank you.
Slightly...ok a LOT
weak from the
deep sweetness of
it.

21 113. LA Fitness Club Manager Antonio W pursues LA Fitness member Jenifer Lewis
22 with romantic intentions.
23
24

25 ⁹ Unbeknownst to LA Fitness member Jenifer Lewis, the reason LA Fitness Club Manager Antonio W was unable to
26 attend his mother's funeral was not because he was out of the country obtaining a Doctorate of Philosophy in
27 Theology from the University of Oxford at Christ Church, as he so (mis)represented, but rather because LA Fitness
28 Club Manager Antonio W (a/k/a Brice Carrington; a/k/a Inmate Number 14020-111) was incarcerated at FCI
Englewood in Colorado. When LA Fitness Club Manager Antonio W's mother, Jeani Ruff, passed away on
December 29, 2011, he was unable to attend her funeral because he was serving time in a federal prison. Jeani Ruff
was, however, alive to witness to her only son being incarcerated – yet again. Online Sources:
www.bop.gov.inmateloc/ and [https://billiongraves.com/grave/jeani-ruff/12918873#/.](https://billiongraves.com/grave/jeani-ruff/12918873#/)

1
2 114. As LA Fitness member Jenifer Lewis becomes more reliant on his emotional
3 support, LA Fitness Club Manager Antonio W explains away his very limited time availability by
4 telling her that he is unable to spend any time with her in the evenings because of all of his
5 previous obligations, especially his childcare responsibilities. She finds this admirable and,
6 therefore, the majority of their romantic relationship revolves around LA Fitness during daytime
7 hours.

8 115. LA Fitness allows LA Fitness Club Manager Antonio W to employ his managerial
9 position as a proverbial pulpit. LA Fitness Club Manager Antonio W doesn't just pontificate to
10 LA Fitness member Jenifer Lewis about himself – about who he is, about the books he wrote,
11 about his Oxford education, about his Navy SEAL experiences, about his Christian faith, about his
12 self-produced and self-narrated podcasts, about his sound design company that revolutionized the
13 sound effects industry – only to her, but LA Fitness Club Manager Antonio W pontificates openly
14 and often about his persona to all of LA Fitness' members, management and staff, including, but
15 not limited to his supervisor, LA Fitness Facility Director Tim Caballero.

16 116. The fact that LA Fitness Club Manager Antonio W held a managerial position at
17 LA Fitness was an important factor in LA Fitness member Jenifer Lewis trusting him, in believing
18 that he was who he represented himself to be.¹⁰ She told friends, "Of course I trust him...it's LA
19 Fitness. And he's not just any employee, he's a manager."

20 117. LA Fitness member Jenifer Lewis believes that because LA Fitness recognizes Club
21 Manager Antonio W as a stable, responsible man, LA Fitness therefore placed him in a position of
22 trust and authority. Had LA Fitness Club Manager Antonio W introduced himself to LA Fitness
23 member Jenifer Lewis in another context or different venue, then she would have had reason to
24 question his authenticity. But LA Fitness Club Manager Antonio W introduced himself to LA
25 Fitness member Jenifer Lewis in a place where she felt safe, in an environment where she saw no

26
27 ¹⁰ LA Fitness states, *online*, on its website, under the tab **WHY JOIN**: "When you enter an LA Fitness, you know
28 what to expect. The state of the art facility and equipment are familiar and comfortable, **but what we are most proud of are the people who are there to serve you**. The people who warmly greet you, expertly train you, enthusiastically teach you. ***It is the entire team, our best resource, who is dedicated to making your fitness experience an exceptional one.***" (Emphasis added.) Online Source: <https://www.lafitness.com/Pages/whyJoin.aspx>.

1 need to question his credentials. LA Fitness member Jenifer Lewis trusts LA Fitness and LA
2 Fitness Club Manager Antonio W, as both, individually and collectively, have a fiduciary
3 responsibility to her, one based upon trust, inherent in the relationship between an LA Fitness
4 member, the company, and its employees.¹¹

5
6 118. LA Fitness Club Manager Antonio W's management position with LA Fitness, as
7 well as his relationship with LA Fitness Facility Director Tim Caballero, allowed him the
8 opportunity to come and go as he pleased, therefore allowing LA Fitness to be the center of his
9 relationship with LA Fitness member Jenifer Lewis.

10 119. LA Fitness Club Manager Antonio W's actions and representations made in the
11 course and scope of his employment as a Club Manager, are never contradicted, but rather
12 condoned, by LA Fitness, including, but not limited to, his supervisor, LA Fitness Facility Director
13 Tim Caballero, who was conspiratorially aware of the LA Fitness Club Manager Antonio W's
14 romantic pursuit of LA Fitness member Jenifer Lewis.

15 120. On Memorial Day, Monday, May 25, 2015, while LA Fitness Club Manager
16 Antonio W was in the course and scope of his employment as a Club Manager, he provides a
17 personal training session to LA Fitness member Jenifer Lewis at the LA Fitness Van Nuys facility
18 after she finishes "playing racquetball."¹²

19 Mon, May 25, 3:55 PM

20 Playing racquet
21 ball. Need abs
22 tightened.

23
24 ¹¹ LA Fitness Facility Director Tim Caballero also owes a fiduciary duty to LA Fitness member Jenifer Lewis.

25
26 ¹² Unbeknownst to LA Fitness member Jenifer Lewis, exactly twenty-six (26) years earlier, on May 25, 1989: (1) LA
27 Fitness Club Manager Antonio W is arrested on a weapons charge; and, (2) An article appears in the *Orlando Sentinel*
28 titled "Fake Football Pro Loves And Leaves - The Bills" elaborating on how "**Antonio Marriott Wilson [...] had taken the [credit] card [his fiancée] had given him, gone on a shopping spree and married someone else.**" (Emphasis added.) Online Source: http://articles.orlandosentinel.com/1989-05-25/news/8905250097_1_orlando-woman-wilson-credit-card.

1
2 121. On Memorial Day, Monday, May 25, 2015, LA Fitness Club Manager Antonio W,
3 while in the course and scope of his employment as a Club Manager, trains LA Fitness member
4 Jenifer Lewis. During the personal training session, he explains to LA Fitness member Jenifer
5 Lewis about a "terrific" investment opportunity for her in Ultimate FX, and tells her he will send
6 her a link that will explain more about this lucrative possibility.¹³

7 122. On Tuesday, May 26, 2015, at 2:49 pm, LA Fitness Club Manager Antonio W,
8 while in the course and scope of his employment, sends a personal email to LA Fitness member
9 Jenifer Lewis, sharing with her a VoiceThread about his sound effects invention, Ultimate FX.

10 |-----Original Message-----

11 From: Tony <[REDACTED]@gmail.com>

12 To: [REDACTED]

13 Sent: Tue, May 26, 2015 2:49 pm

14 Subject: Antonio M. Wilson has shared a VoiceThread with you

15 Antonio M. Wilson has shared a VoiceThread with you:

16 Creating Pinnacle Ultimate

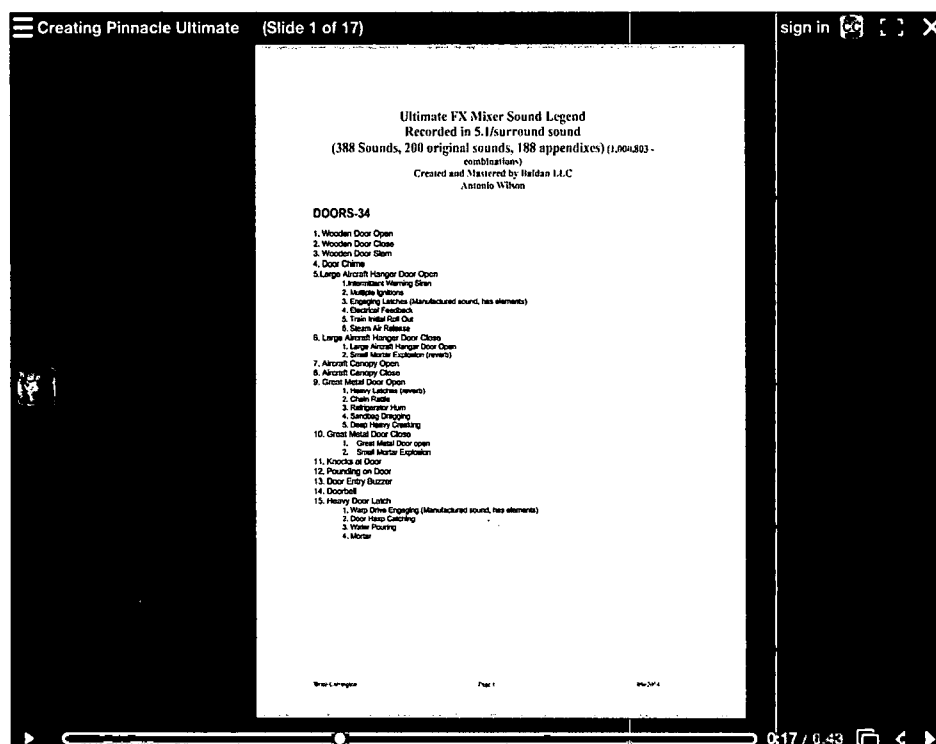
17 <http://voicethread.com/share/6019679>

18 123. LA Fitness knows that LA Fitness member Jenifer Lewis is not the first LA Fitness
19 member with whom LA Fitness Club Manager Antonio W has shared investment opportunities in
20 Ultimate FX while in the course and scope of his employment as a Club Manager. LA Fitness
21 knows its Club Manager shares investment opportunities in Ultimate FX with LA Fitness'
22 members, management and staff; he tells LA Fitness member Jenifer Lewis, "some of the young
23 trainers want to get in on the ground floor" of this investment. Because neither LA Fitness'
24 corporate office, nor LA Fitness Facility Director Tim Caballero, prohibits his solicitation for
25 Ultimate FX, LA Fitness' corporate office and LA Fitness Facility Director Tim Caballero
26 facilitate and condone, endorse and ratify his actions (that he was specifically prohibited from
27 engaging in as part of the plea agreement of conviction for investment fraud).

28 ¹³ Unbeknownst to LA Fitness member Jenifer Lewis, exactly eight (8) years earlier, in May 2007, *BusinessWire* posts
an *online* article announcing the establishment of Ultimate FX. However, although Antonio W's name is not
mentioned, his previous persona, Brice Carrington, is: "Brice Carrington, Sound Designer Establishes Ultimate FX, a
Sound Library That Revolutionizes the Industry by Bringing Hollywood Styled Sound Effects Directly to the
Consumer."

Online Source: <http://www.businesswire.com/news/home/20070502006539/en/Brice-Carrington-Sound-Designer-Establishes-Ultimate-FX>.

124. LA Fitness member Jenifer Lewis watches the VoiceThread to Ultimate FX that was emailed to her as an investment opportunity by LA Fitness Club Manager Antonio W. The VoiceThread presentation consists of seventeen (17) slides.



Online Source: <https://voicethread.com/myvoice/-thread/6019679/30916756/32390661>.

125. The shadow gray FOOTER located at the very bottom of the first of the seventeen slides (Slide 1 of 17) lists the author's name, the page number, and the date of publication:¹⁴

Brice Carrington	Page 1	9/6/2014
Brice Carrington	Page 1	9/6/2014



Online Source: <https://voicethread.com/myvoice/#thread/6019679/30916756/32390661>.

¹⁴ Unbeknownst to LA Fitness member Jenifer Lewis, LA Fitness Club Manager Antonio W is utilizing the same company – Ultimate FX – to con her out of her investment that his previous persona, Brice Carrington, used to con investors out of \$4 million. It also should be noted that the date of publication that appears in the shadow gray FOOTER located at the very bottom of the first of the seventeen slides (Slide 1 of 17) – September 6, 2014 – is only eight (8) days shy of LA Fitness Club Manager Antonio W's release from the federal prison after serving a four (4) year sentence on his Felony conviction. Online Source: <http://www.bop.gov/inmateloc/>.

126. However, when a potential investor moves the cursor over the green bar at the bottom of the first of the seventeen slides (Slide 1 of 17), the author's name appearing in the shadow gray FOOTER – Brice Carrington – becomes obscured by contradictory information which states that the author is Antonio M. Wilson (a/k/a LA Fitness Club Manager Antonio W). The date of publication – “9/6/2014” or “Sep 6, 2014” – remains consistent.¹⁵



Antonio M. Wilson
Sep 6, 2014, 3:14 PM
0:17 / 0:41

Page 1

9 6 2014

Online Source: <https://voicethread.com/myvoice/#thread/6019679/30916756/32390661>.

127. On the left side of all 17 slides, there is a black-and-white photo of a lion with blood-red eyes. When the cursor is on the lion, “Antonio M. Wilson” appears as the author.¹⁶



Antonio M. Wilson

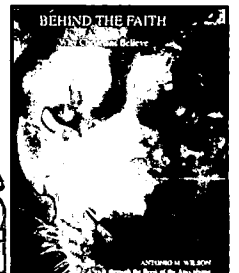


Online Source: <https://voicethread.com/myvoice/-thread/6019679/30916756/32390661>.

¹⁵ Note that when a potential investor moves the cursor over the green bar at the bottom of ANY of the slides in the VoiceThread to Ultimate FX that LA Fitness Club Manager Antonio W sends as an investment opportunity, then at the bottom of the page appears the same blue box with the same name (“Antonio M. Wilson”), same date (“Sep 6, 2014”), with the same lion with the same red eyes.

Online Source: <https://voicethread.com/myvoice/#thread/6019679/30916756/32390661>.

¹⁶ Unbeknownst to LA Fitness member Jenifer Lewis, the cover art of LA Fitness Club Manager Antonio W's book *Behind The Faith: REVELATION*, a black-and-white photograph of the face of a lion with blood-red eyes looking directly into the camera, is similar to, if not copied directly from, a color photograph of the face of a lion looking directly into the camera, with one paw draped over the shoulder of LA Fitness Club Manager Antonio W, that Brice Carrington used to defraud investors in Ultimate FX out of nearly \$4 million in an investment scheme that took place from 2001-2005; In 2009, Brice Carrington pleaded guilty to wire fraud and tax evasion.

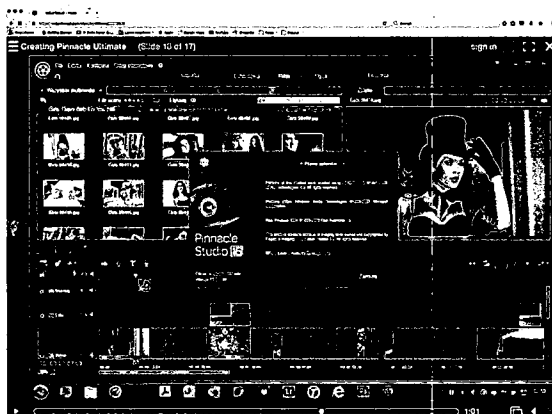


1
2 128. The first of seventeen slides (Slide 1 of 17), all of which are self-narrated by LA
3 Fitness Club Manager Antonio W, provides a "brief summary of how Ultimate FX became
4 Pinnacle Ultimate."

5 **"We started as a sound library with designs on a piece of paper just like**
6 **this one. We came up with about 200 original sounds that had 188**
7 **stems connected to these sounds. If you look on this paper you'll see**
8 **where there's a sound that starts out at the top like the large aircraft hangar**
9 **door and then underneath would be all the elements or stems that were used**
10 **to create that one sound. That became our library that was distributed to**
11 **movie studios and production companies all over the world."** (Emphasis
12 added.)

13 *Online Source:* <https://voicethread.com/myvoice/-thread/6019679/30916756/32390661>.

14 129. The last of seventeen slides (Slide 18 of 17) (sic) is a picture of Pinnacle Ultimate
15 in Germany.



16 *Online Source:* <https://voicethread.com/myvoice/-thread/6019679/30916743/32391882>.

17 130. In Slide 18 of 17 (sic), LA Fitness Club Manager Antonio W explains, in his own
18 voice, reasons to invest.¹⁷ "Studio was sold all over the world, and our plug in, as part of studio,
19 has sold over one million, twenty thousand (1,020,000) units from 2005 to present day, which
20 means that our technology has value in some of the minds of the consumers out there." LA Fitness
21 Club Manager Antonio W ends Slide 18 of 17 (sic) by stating, in his own words and in his own

22
23
24
25
26 ¹⁷ Unbeknownst to LA Fitness member Jenifer Lewis, from 2001 to 2005, LA Fitness Club Manager "Antonio W,"
27 f/k/a "Brice Carrington," f/k/a "Tony Wilson," n/k/a "Dr. Antonio M. Wilson," "mastermind[ed] a scheme to defraud
28 investors [out of more than \$4 million] by promising them big returns on their investment via various sound-effects
design projects he manufactured through his company, Ultimate FX."

Online Source: <http://www.lipstickalley.com/showthread.php/198319-Brice-carrington-he-s-a-fake%21?highlight=brice+carrington>.

voice: "We think that this small idea [...] gives at least an idea of what you can do if you think bigger and you dare to take on the challenge of being different."

Online Source: <https://voicethread.com/myvoice/#thread/6019679/30916743/32391882>.

131. LA Fitness Club Manager Antonio W tells LA Fitness member Jenifer Lewis that he has found another potential investor at the gym, a "rich movie producer."

132. On Wednesday, May 27, 2015, at 12:16 pm, LA Fitness Club Manager Antonio W, while in the course and scope of his employment, receives a text from LA Fitness member Jenifer Lewis, with her asking him, "What time do you want to leave the gym?"

Wed, May 27, 12:16 PM

What time do u
want to leave the
gym

133. On or about Sunday, May 31, 2015, LA Fitness Club Manager Antonio W, while in the course and scope of his employment as a Club Manager, encourages LA Fitness' members, management and staff to listen to his most recent self-produced and self-narrated podcast on soundcloud.com: "Is The Israel Of Today The Israel of the Bible"?



Dr Antonio M Wilson @amariotw
My new sounds: Is The Israel Of Today The Israel Of The Bible
soundcloud.com/antoniomwilson... on #SoundCloud

31 May 2015

← ↻ ♡ ...

Online Source: <https://mobile.twitter.com/amariotw>.

B. "GOOD MORNING, MRS. WILSON. OOPS, DID I SAY THAT OUT LOUD?!"

134. On June 1, 2015, LA Fitness Club Manager Antonio W and LA Fitness member Jenifer Lewis discuss, via text, the possibility of him "officially" becoming her boyfriend. LA Fitness member Jenifer Lewis is hesitant due to the quick pace of their relationship and requests one more conversation before making her final decision.

Mon, Jun 1, 8:16 PM

Interesting! I know
you moved this
weekend so I did
not call. But
excuse Mr Wilson
but where is my
new boyfriend?

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Wow!!!! Am I official🤔

Only if youreeeeeeeeeeee ally want to be.

Do you want to be?

I need ONE More conversation in person. I'm coming to the gym in the morning but have to leave by noon. I have a photo shoot. Maybe we can steal away for fifteen minutes twenty minutes. Or wait till Thursday and go to lunch

135. On June 2, 2015, LA Fitness Club Manager Antonio W “officially” becomes LA Fitness member Jenifer Lewis’ boyfriend after the Club Manager and member discuss their relationship at LA Fitness, while LA Fitness Club Manager Antonio W was in the course and scope of his employment as a Club Manager, the two were able to “steal away fifteen or twenty minutes,” as they planned the night before.

Tue, Jun 2, 5:24 AM

Ok I look forward to seeing you this morning

Tue, Jun 2, 12:29 PM

Trying to find you

Front door

Walking back

136. By June 30, 2015, LA Fitness Club Manager Antonio W has gone from wanting to be LA Fitness member Jenifer Lewis’ boyfriend to referring to her as “Mrs. Wilson,” his wife.

Tue, Jun 30, 5:15 AM

Good morning Mrs. Wilson 🤔
oops did I say that out loud?! 😊

01/06/2017

137. In between the first day of June (June 1, 2015) and the last day of June (June 30, 2015), on eight (8) separate occasions, LA Fitness Club Manager Antonio W, while in the course and scope of his employment as a Club Manager, calls LA Fitness member Jenifer Lewis from LA Fitness' main telephone number: 818-988-7411.

LA Fitness

[Website](#)[Directions](#)

2.8 ★★☆☆☆ 97 Google reviews
Health Club · Van Nuys

Address: 6161 Sepulveda Blvd, Van Nuys, CA 91411

Hours: Open today · 5AM–11PM ▾

Phone: (818) 988-7411

Online Source: <https://www.google.com/?q=LA+Fitness+Van+nuys>.

138. If the two were not spending time together physically training at LA Fitness' Van Nuys facility, then they were spending time together physically training at LA Fitness member Jenifer Lewis' home. There were generally three times during the day that LA Fitness Club Manager Antonio W would physically train LA Fitness member Jenifer Lewis at her home: (1) when he would stop by her home on his way to work at LA Fitness; (2) when he would stop by her home after work at LA Fitness; or, (3) when he would stop by her home during the middle of his work day at LA Fitness. (Typically, the two would physically train after they had met for lunch.) LA Fitness Club Manager Antonio W would physically train LA Fitness member Jenifer Lewis either inside her home or outside her home, poolside.

139. On Tuesday, June 2, 2015, at 12:22 pm, LA Fitness Club Manager Antonio W, while in the course and scope of his employment as a Club Manager, calls LA Fitness member Jenifer Lewis from LA Fitness' main telephone number: 818-988-7411.

140. On Wednesday, June 3, 2015, at 10:55 am, LA Fitness Club Manager Antonio W, while in the course and scope of his employment as a Club Manager, calls LA Fitness member Jenifer Lewis from LA Fitness' main telephone number: 818-988-7411.

141. On Thursday, June 4, 2015, at 10:55 am, LA Fitness Club Manager Antonio W, while in the course and scope of his employment as a Club Manager, calls LA Fitness member Jenifer Lewis from LA Fitness' main telephone number: 818-988-7411.

1
2 142. On Thursday, June 4, 2015, LA Fitness Club Manager Antonio W comes to LA
3 Fitness member Jenifer Lewis' home, bringing his Oxford diploma (which, in reality, he never
4 earned), Navy SEAL medals (one medal for being a sniper, one medal for saving a life, and two
5 medals pinned on him by President Clinton after a Special Mission – which, in reality, he never
6 earned), and his pen made from a bullet given to him by his team (which, in reality, he never had).
7 Jenifer Lewis introduces Tony to her assistant, Laura. Jenifer Lewis provides Tony with a check
8 for \$800.00 for his “moving expenses,” which he pledges to pay back.

9 143. On Saturday, June 6, 2015, at 10:32 am, LA Fitness Club Manager Antonio W,
10 while in the course and scope of his employment as a Club Manager, calls LA Fitness member
11 Jenifer Lewis from LA Fitness' main telephone number: **818-988-7411**.

12 144. On Thursday, June 11, 2015, at 1:51 pm, LA Fitness Club Manager Antonio W,
13 while in the course and scope of his employment, calls LA Fitness member Jenifer Lewis from LA
14 Fitness' main telephone number – **818-988-7411** – and leaves the following voicemail:

15 “Hi. This is Tony. Just thinking about you and wanted to say
16 ‘Hi.’ Give me a call when you get a chance.”

17 145. On Friday, June 12, 2015, at 5:32 pm, LA Fitness Club Manager Antonio W, while
18 in the course and scope of his employment as a Club Manager, calls LA Fitness member Jenifer
19 Lewis from LA Fitness' main telephone number: **818-988-7411**.

20 146. On Tuesday, June 16, 2015, at 1:06 pm, LA Fitness Club Manager Antonio W calls
21 LA Fitness member Jenifer Lewis and leaves the following voicemail:

22 “Hey, I’m trying to call you back.”¹⁸

23
24 ¹⁸ Unbeknownst to LA Fitness member Jenifer Lewis, exactly twenty-six (26) years earlier, on June 16, 1989, an
25 article about the man who would become an LA Fitness Club Manager (the man who was currently calling and texting
26 her whom she had met when he approached her at LA Fitness to ask if he could train her) appeared in the *Orlando*
27 *Sentinel* announcing that “State prosecutors have dropped grand theft charges against [Antonio Wilson, 26,] who
28 police said convinced a California woman to invest in a fake Orlando business.” *The grand theft charges were*
dropped in Florida because “the grand theft charges must be brought in California because the woman [...] returned
to California before deciding to invest \$5,000” and “Wilson also flew to California and cashed the [] check from
there...”. The article also reported “Authorities say he has posed as an NFL football player [...] and was engaged
to at least three women, all of who said he owes them money.” (Emphasis added.) Online Source:
http://articles.orlandosentinel.com/1989-06-16/news/8906160051_1_grand-theft-orlando-forgery.

1 At 8:31 pm on Tuesday, June 16, 2015, LA Fitness Club Manager Antonio W and LA
2 Fitness member Jenifer Lewis exchange the following texts:

3 Tue, Jun 16, 8:31 PM

4 The eagle has
5 landed. Had a nice
6 flt.

7 147. On Wednesday, June 17, 2015, at 1:35 pm, LA Fitness Club Manager Antonio W,
8 while in the course and scope of his employment, and LA Fitness member Jenifer Lewis, exchange
9 texts.

10 Wed, Jun 17, 1:35 PM

11 Call me when u
12 get a moment

13 K in a training
14 class

15 148. On Friday, June 19, 2015, Antonio W and Jenifer Lewis consummate their
16 relationship. On his right bicep, he has a tattoo of the Navy SEAL emblem that appeared real to
17 her.

18 149. On Wednesday, June 24, 2015, at 11:05 am, LA Fitness Club Manager Antonio W,
19 while in the course and scope of his employment as a Club Manager, exchanges texts with LA
20 Fitness member Jenifer Lewis while both are physically in the LA Fitness Van Nuys facility.

21 Wed, Jun 24, 11:50 AM

22 Playing racquet
23 ball. Call when ya
24 ready

25 Ready

26 150. On Wednesday, June 24, 2015, at 12:18 pm, LA Fitness Club Manager Antonio W,
27 while in the course and scope of his employment as a Club Manager, calls LA Fitness member
28 Jenifer Lewis from LA Fitness' main telephone number – 818-988-7411 – while Jenifer Lewis is
physically in LA Fitness' Van Nuys facility, and leaves the following voicemail:

“Hey, I’m ready when you are.”

1
2 151. On Wednesday, June 24, 2015, at 2:04 pm, LA Fitness Club Manager Antonio W,
3 while in the course and scope of his employment as a Club Manager, exchanges texts with LA
4 Fitness member Jenifer Lewis while both are physically in LA Fitness' Van Nuys facility.

5 Wed, Jun 24, 2:04 PM

6 Call me when ur
7 ready

8 K

9 152. On Friday, June 26, 2015, at 10:20 am, LA Fitness Club Manager Antonio W, while
10 in the course and scope of his employment as a Club Manager, calls LA Fitness member Jenifer
11 Lewis from LA Fitness' main telephone number: 818-988-7411. .

12 153. On Monday, June 29, 2015, at 10:11 am, LA Fitness Club Manager Antonio W,
13 while in the course and scope of his employment as a Club Manager, and LA Fitness member
14 Jenifer Lewis, exchange texts.¹⁹

15 Mon, Jun 29, 10:11 AM

16 Good morning Mr.
17 Wilson

18 Ma Lady☺


19 Coming to the
20 gym as soon as I
21 can. Found an apt
22 for the family. And
23 dealing with the all
24 ness of that.

25 LA Fitness Club Manager Antonio W, while in the course and scope of his employment as
26 a Club Manager, texts LA Fitness member Jenifer Lewis to "please bring [his] glasses," that he left
27 on her nightstand at her house, to him at LA Fitness, so that he can properly perform his
28 managerial duties.

29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100
101
102
103
104
105
106
107
108
109
110
111
112
113
114
115
116
117
118
119
120
121
122
123
124
125
126
127
128
129
130
131
132
133
134
135
136
137
138
139
140
141
142
143
144
145
146
147
148
149
150
151
152
153
154
155
156
157
158
159
160
161
162
163
164
165
166
167
168
169
170
171
172
173
174
175
176
177
178
179
180
181
182
183
184
185
186
187
188
189
190
191
192
193
194
195
196
197
198
199
200
201
202
203
204
205
206
207
208
209
210
211
212
213
214
215
216
217
218
219
220
221
222
223
224
225
226
227
228
229
230
231
232
233
234
235
236
237
238
239
240
241
242
243
244
245
246
247
248
249
250
251
252
253
254
255
256
257
258
259
260
261
262
263
264
265
266
267
268
269
270
271
272
273
274
275
276
277
278
279
280
281
282
283
284
285
286
287
288
289
290
291
292
293
294
295
296
297
298
299
300
301
302
303
304
305
306
307
308
309
310
311
312
313
314
315
316
317
318
319
320
321
322
323
324
325
326
327
328
329
330
331
332
333
334
335
336
337
338
339
340
341
342
343
344
345
346
347
348
349
350
351
352
353
354
355
356
357
358
359
360
361
362
363
364
365
366
367
368
369
370
371
372
373
374
375
376
377
378
379
380
381
382
383
384
385
386
387
388
389
390
391
392
393
394
395
396
397
398
399
400
401
402
403
404
405
406
407
408
409
410
411
412
413
414
415
416
417
418
419
420
421
422
423
424
425
426
427
428
429
430
431
432
433
434
435
436
437
438
439
440
441
442
443
444
445
446
447
448
449
450
451
452
453
454
455
456
457
458
459
460
461
462
463
464
465
466
467
468
469
470
471
472
473
474
475
476
477
478
479
480
481
482
483
484
485
486
487
488
489
490
491
492
493
494
495
496
497
498
499
500
501
502
503
504
505
506
507
508
509
510
511
512
513
514
515
516
517
518
519
520
521
522
523
524
525
526
527
528
529
530
531
532
533
534
535
536
537
538
539
540
541
542
543
544
545
546
547
548
549
550
551
552
553
554
555
556
557
558
559
560
561
562
563
564
565
566
567
568
569
570
571
572
573
574
575
576
577
578
579
580
581
582
583
584
585
586
587
588
589
590
591
592
593
594
595
596
597
598
599
600
601
602
603
604
605
606
607
608
609
610
611
612
613
614
615
616
617
618
619
620
621
622
623
624
625
626
627
628
629
630
631
632
633
634
635
636
637
638
639
640
641
642
643
644
645
646
647
648
649
650
651
652
653
654
655
656
657
658
659
660
661
662
663
664
665
666
667
668
669
670
671
672
673
674
675
676
677
678
679
680
681
682
683
684
685
686
687
688
689
690
691
692
693
694
695
696
697
698
699
700
701
702
703
704
705
706
707
708
709
710
711
712
713
714
715
716
717
718
719
720
721
722
723
724
725
726
727
728
729
730
731
732
733
734
735
736
737
738
739
740
741
742
743
744
745
746
747
748
749
750
751
752
753
754
755
756
757
758
759
760
761
762
763
764
765
766
767
768
769
770
771
772
773
774
775
776
777
778
779
780
781
782
783
784
785
786
787
788
789
790
791
792
793
794
795
796
797
798
799
800
801
802
803
804
805
806
807
808
809
810
811
812
813
814
815
816
817
818
819
820
821
822
823
824
825
826
827
828
829
830
831
832
833
834
835
836
837
838
839
840
841
842
843
844
845
846
847
848
849
850
851
852
853
854
855
856
857
858
859
860
861
862
863
864
865
866
867
868
869
870
871
872
873
874
875
876
877
878
879
880
881
882
883
884
885
886
887
888
889
890
891
892
893
894
895
896
897
898
899
900
901
902
903
904
905
906
907
908
909
910
911
912
913
914
915
916
917
918
919
920
921
922
923
924
925
926
927
928
929
930
931
932
933
934
935
936
937
938
939
940
941
942
943
944
945
946
947
948
949
950
951
952
953
954
955
956
957
958
959
960
961
962
963
964
965
966
967
968
969
970
971
972
973
974
975
976
977
978
979
980
981
982
983
984
985
986
987
988
989
990
991
992
993
994
995
996
997
998
999
1000

¹⁹ Unbeknownst to LA Fitness member Jenifer Lewis, three (3) years (less one day) earlier, on June 28, 2012, at 2:19 pm, *ScamVent*, an online source for scams and frauds, posts two Topics: (1) "Brice Carrington a/k/a Antonio Wilson"; and, (2) "ULTIMATE FX, Brice Carrington a/k/a Antonio Wilson."
Online Source: http://scamvent.com/forums/search/?bbp_search=Brice+Carrington.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28


Bring my glasses
please


Will do

At 1:58 pm, LA Fitness member Jenifer Lewis texts LA Fitness Club Manager Antonio W, while in the course and scope of his employment as a Club Manager, that she is at LA Fitness and that he is “surrounded by kids. So you find me when ur free.”


Mon, Jun 29, 1:58 PM

I'm here and u r
surrounded by
kids. So find me
when ur free.





At 10:10 pm, LA Fitness member Jenifer Lewis texts LA Fitness Club Manager Antonio W “Sweet dreams Mr. Wilson .



Mon, Jun 29, 10:10 PM

Sweet dreams Mr.
Wilson 

154. Seven hours later, on Tuesday, June 30 at 5:15 am, LA Fitness Club Manager Antonio W responds by texting LA Fitness member Jenifer Lewis, “Good morning Mrs. Wilson.

 oops did I say that out loud?!” 

Tue, Jun 30, 5:15 AM

Good morning
Mrs. Wilson 
oops did I say that
out loud?! 

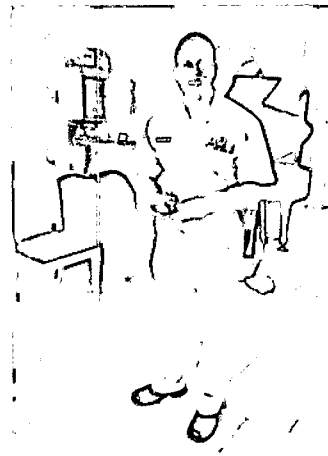
155. Between the first day of July (July 1, 2015) and the last day of July (July 31, 2015), on seven (7) separate occasions, LA Fitness Club Manager Antonio W, while in the course and scope of his employment as a Club Manager, calls LA Fitness member Jenifer Lewis from LA Fitness’ main telephone number: 818-988-7411. If the conversation between the two is not about personal training and “rendezvous-ing” at LA Fitness, then it is about her emotionally “investing”

01/06/2017

1 in their romance and marriage, which meant her financially "investing" in his company, Ultimate
2 FX, and his career as a Bible scholar.

3 156. On Wednesday, July 1, 2015, at 10:47 am, LA Fitness Club Manager Antonio W,
4 while in the course and scope of his employment as a Club Manager, calls LA Fitness member
5 Jenifer Lewis from LA Fitness' main telephone number: 818-988-7411.

6 157. On Thursday, July 2, 2015, LA Fitness Club Manager Antonio W appears at LA
7 Fitness member Jenifer Lewis' home wearing his Navy SEAL uniform (which, in reality, he never
8 earned), displaying the medals that he had previously shown her, including the two medals pinned
9 on him by President Clinton after a Special Mission (which, in reality, never happened). Below
10 are photos of him buckling the belt of his uniform after a very personal "personal training" session.
11



19 158. While in his Navy SEAL uniform, LA Fitness Club Manager Antonio W tells LA
20 Fitness member Jenifer Lewis that he was just informed that "any day now" he is going to be
21 deployed to full-time duty to serve on a Special Forces mission to fight ISIS. He says that senior
22 officers from the Navy SEALs have physically visited him at LA Fitness to ask him to return.²⁰
23 With tears in his eyes, he tells her that he does not want to go because it would mean that they
24 would be apart, and that there is always the risk that he might be killed or seriously wounded. He
25 tells her he declined and that retiring from the Navy SEALs is the only solution. It would
26

27
28 ²⁰ Unbeknownst to LA Fitness member Jenifer Lewis, at the time that LA Fitness Club Manager Antonio W was
representing himself to her as a Navy SEAL, he was a convicted felon multiple times over, and therefore ineligible to
be a Navy SEAL. Online Source: <http://www.military.com/special-operations/requirements-for-navy-seals.html>.

1 guarantee their time together and, more importantly, he will be able to continue to protect his
2 children from their unstable mother.

3
4 159. LA Fitness Club Manager Antonio W tells LA Fitness member Jenifer Lewis that it
5 is too expensive for him to fully retire from the Navy because he is the single father of two school-
6 aged children, and he has to take their future financial well being into consideration. Thus begins
7 an ongoing conversation between the two concerning their relationship and his parental
8 responsibilities.

9
10 160. Slowly, over time, LA Fitness Club Manager Antonio provides a solution to the
11 problem: If LA Fitness member Jenifer Lewis will replace his salary by investing in his sound
12 effects invention business, then he can quit his job at LA Fitness and retire from the Navy. LA
13 Fitness Club Manager Antonio W vows to repay her, and easily so, because by not working at LA
14 Fitness he will be free to obtain additional investors for Ultimate FX, as well as be able to intensify
15 his career as a lecturer and writer on Biblical topics.

16
17 161. On or about Sunday, July 5, 2015, LA Fitness Club Manager Antonio W, while in
18 the course and scope of his employment as a Club Manager, encourages LA Fitness' members,
19 management and staff to listen to his most recent self-produced and self-narrated podcast on
20 soundcloud.com: "The Boatman – 10 Levels Of Heaven & Purgatory."



Dr Antonio M Wilson @amariotw 5 Jul 2015
My new sounds: The Boatman - 10 Levels Of Heaven & Purgatory
soundcloud.com/antoniomwilson... on #SoundCloud



21
22 *Online Source:* <https://mobile.twitter.com/amariotw>.

23 162. On Monday, July 6, 2015, at 12:10 pm, LA Fitness Club Manager Antonio W,
24 while in the course and scope of his employment as a Club Manager, calls LA Fitness member
25 Jenifer Lewis from LA Fitness' main telephone number: 818-988-7411.

26 163. On Wednesday, July 8, 2015, at 11:31 am, LA Fitness Club Manager Antonio W,
27 while in the course and scope of his employment as a Club Manager, calls LA Fitness member
28 Jenifer Lewis from LA Fitness' main telephone number: 818-988-7411.

1
2 164. On Friday, July 10, 2015, at 9:13 am, and again at 9:40 am, LA Fitness Club
3 Manager Antonio W, while in the course and scope of his employment as a Club Manager, calls
4 LA Fitness member Jenifer Lewis from LA Fitness' main telephone number: 818-988-7411.

5 165. On Monday, July 13, 2015, at 11:57 am, LA Fitness Club Manager Antonio W,
6 while in the course and scope of his employment as a Club Manager, exchanges texts with LA
7 Fitness member Jenifer Lewis regarding her location at "the gym" so that he can find her.

8 Mon, Jul 13, 11:57 AM

9 I'm here

10 On the side of the
11 gym

12 (Coming)

13 166. In the early afternoon on Monday, July 13, 2015, LA Fitness Club Manager
14 Antonio W was at the home of LA Fitness member Jenifer Lewis, along with Julia Walker, friend
15 and manager of Jenifer Lewis. During the conversation, LA Fitness Club Manager Antonio W
16 brags, as he is prone to do, about how good he is at the sales portion of his position as LA Fitness'
17 Club Manager, Personal Training, but that he is not being fairly compensated by LA Fitness. A
18 large portion of his compensation comes from bonuses through sales of Personal Training
19 packages. However, LA Fitness Club Manager Antonio W complains that every time he surpasses
20 the sales quota, LA Fitness simply increases it, thus making it more difficult for him to earn the
21 money he deserves, believing that LA Fitness' motivation is due to his race.

22 C. **"LOVE YOUR MONEY OR ME...TO BE BLUNT."**

23 167. As the two spend more time together, LA Fitness member Jenifer Lewis finds
24 herself believing that the LA Fitness Club Manager is "the one," and that investing financially in
25 their future makes sense.

26 168. On Thursday, July 16, 2015, at 8:38 am, LA Fitness Club Manager Antonio W,
27 while in the course and scope of his employment as a Club Manager, calls LA Fitness member
28 Jenifer Lewis from LA Fitness' main telephone number: 818-988-7411.

1
2 169. Later that day, on Thursday, July 16, 2015, at 4:47 pm, LA Fitness member Jenifer
3 Lewis texts, "I love u. No two step. And you KNOW it."

4 Thu, Jul 16, 4:47 PM

5 I love u. No two
6 step. And you
7 KNOW it.

8 A "two-step" means hesitation; in recent days she has "pulled back" from a total commitment
9 because she senses that something is "off." In response, and to not lose the ground he has gained,
10 he doubles down in his pursuit of LA Fitness member Jenifer Lewis.

11 At 6:15 pm, LA Fitness member Jenifer Lewis continues with a longer text, admitting that
12 she is "scared," and that he knows it. She apologizes for blowing up at him earlier.

13 Mr beautiful Wilson.

14 Didn't mean to send mr beautiful Wilson. It was the beginning of this
15 long Text. Laura basically said- he didn't look at me the way most
16 people do because he knew who he was [sic]. **Tony. My humblest**
17 **apologies for my behavior today. I am scared and you know that.**
18 But God knows I don't have to be THAT scared. I mean sobbing on the
19 dining room table? lol, **your life of service, Oxford, Seal, your soul,**
20 **your eyes, your experience, your everything. you you you. [EMOJI]**
21 **Yes you.** This trip will be good for me. I can think breathe and journal
22 while in Santa Fe. **You KNOW I'm going to relax and settle into us.**
23 **You KNOW I love you. You already KNOW. And so do I.**
24 (Emphasis added.)

25 LA Fitness Club Manager Antonio W responds immediately.

26 I only want you to be at peace and free to love the way you now how
27 I...I am here I am waiting...

28 And you can cry sob squeak squeal all you want... **I am still here as long**
as it serves you for me to do so.

29 LA Fitness member Jenifer Lewis texts back.



30 170. On Saturday, July 18, 2015, at 11:08 pm, Jenifer Lewis texts LA Fitness Club
31 Manager Antonio W, "This is the first time I realllllly want to spend my life with someone. This
32 is REAL. It's happening. We both want to be at peace, exhale, and be loved for who we are.
33 Wow."

Sat, Jul 18, 11:08 PM

This is the first
time I realllllly
want to spend the
rest of my life with
someone. This is
REAL. It's
happening. We
both want to be at
peace, exhale, and
be loved for who
we are. Wow

171. On Sunday, July 19, 2015, at 7:36 am, LA Fitness Club Manager Antonio W texts LA Fitness Member Jenifer Lewis that he is "happy it's starting to get through." Throughout, Antonio W compares money with love. **Paragraph 3:** "There are so many people that have money [who] are lonely and die alone.... So many have money and no peace, so many have money and people around them because of their money and they never know who loves them for themselves and not who they are." **Paragraph 4:** "Money cannot give love or warmth of spirit and the heart... When we don't have true love we have to believe all those around us actually love us and not our cash...But that is us deciding to believe people care about us, but the only way to know for sure is when your purpose in the lives around you is gone, no more money no more fame or fortune.... That's a tough way to learn...". **Paragraph 6:** "If you did not have money or were known in the world who among your friends would you know, and of those who would hang in there with you while your [sic] difficult?" **Paragraph 7:** "I can't compete with that, I am happy the tide is turning, it is my hope we get to a place where we never have to think about cash but the peace it brings...".

I am happy it's starting to get through.

Let today be a day that thrust you into all of your tomorrows, with peace and confidence that all is well.

There are so many people that have money are lonely and die alone.... So many have money and no peace, so many have money and people around them because of their money and they never know who loves them for themselves and not who they are

Money cannot give love or warmth of spirit and the heart... When we don't have true love we have to believe all those around us actually love us and not our cash...But that is us deciding to believe people care about us, but the only way to know for sure is when your purpose in the lives

1 around you is gone, no more money no more fame or fortune.... That's a
2 tough way to learn, a lot like Melba More....²¹ 🙄

3 The reason I don't want to know about or see your work is to know for
4 certain I love you and nothing else, so that you can know as well, so
5 many people around you are the result of your work.. That's not to say
6 that are not great friends but it is to say they have a reason at some point
7 for their connection.... It's worth the thought so you can get some
8 perspective on my feelings for you...

9 If you did not have money or were known in the world who among your
10 friends would you know, and of those who would hang in there with you
11 while your difficult? They may all be there for you and that's cool, but
12 my point is that love would and only those the LOVE Jenny would be.....

13 I want to get past all the insecurities, but a persons imagination and fears
14 can be insurmountable.... I can't compete with that, I am happy the tide is
15 turning, it is my hope we get to a place where we never have to think
16 about cash but the peace it brings, that there is no violation or calendar
17 involved in how or why we do or don't do a thing, that you get to a point
18 that you simply believe and know you are loved for you are with a catch
19 (Emphasis added.)

20 LA Fitness member Jenifer Lewis replies at 11:29 pm, requesting that the LA Fitness Club
21 Manager text her "the PLAN" so that she can "digest it."

22 Sun, Jul 19, 11:29 PM

23 Please text me the
24 PLAN. So I can
25 digest it on the
26 plane 🙄

27 172. On Sunday, July 19, 2015, after LA Fitness Club Manager Antonio W preaches to
28 LA Fitness member Jenifer Lewis via text that "Money cannot give love or warmth of spirit and
the heart," but before LA Fitness member Jenifer Lewis responds and requests that the LA Fitness
Club Manager text her "the PLAN" so that she can "digest it," he self-produces and self-narrates
another podcast on soundcloud.com – "Hard Sayings Of The Bible" -- which he subsequently,

21 LA Fitness member Jenifer Lewis knows that Melba Moore is an African-American singer, actress and entertainer
who, after fifteen (15) years of marriage to her husband and business manager, Charles Huggins, was left in financial
ruin when he "took every penny she owned" before divorcing her.
Online Source: <http://nypost.com/2014/02/09/singer-melba-moore-stands-by-ex-facing-jail-in-ponzi-scheme/>.

1 while in the course and scope of his employment as a Club Manager, encourages LA Fitness'
2 members, management and staff to listen to and learn from.
3



4 Dr Antonio M Wilson @amariotw
5 My new sounds: Hard Sayings Of The Bible |
6 soundcloud.com/antoniomwilson... on #SoundCloud

19 Jul 2015



7 Online Source: <https://mobile.twitter.com/amariotw>.

8 173. On Monday, July 20, 2015, at 5:21 am, as requested the night before, LA Fitness
9 Club Manager Antonio W texts LA Fitness member Jenifer Lewis "the PLAN," broken down into
10 eight (8) steps. The eighth step involves the LA Fitness Club Manager moving "out of [his] job" at
11 LA Fitness and states that **"this is the area that drives all the others..."**. The LA Fitness Club
12 Manager's "PLAN" ends with the following sentence: **"In any case your decision about what**
13 **your (sic) going to do is the most significant love your money or me...to be blunt."** (Emphasis
14 added.)

- 15 1. You decide what exactly you want in a man
- 16 2. Decide what you want to do about me in particular
- 17 3. Be decisive about your decision
- 18 4. Once you make that decision and it sticks...which is to say I can
19 believe it because there is no more back and forth, decide on if you want
20 to be part of an exit strategy with me on my job to facilitate more time
21 together. This is NOT mandatory it will simply take more time on my
22 own.
- 23 5. Once you have truly committed , **DECIDE on marriage or NOT**
- 24 6. If yes then I will begin introducing the transition to the children's
25 mother, housing, schools, etc
- 26 7. I will introduce you to the children
- 27 8. Depending on my financial condition I will move out of my job and
28 begin my one, **this is the area that drives all the others...** In any case
your decision about what your going to do is the most significant **love**
your money or me...to be blunt. (Emphasis added.)

24 LA Fitness member Jenifer Lewis replies at 7:43 am.

25 Thank you Tony. I'll see you at the house for lunch. ❤️

26 LA Fitness Club Manager Antonio W responds immediately.

27 Yes dear
28

01/06/2017

1
2 174. On Monday, July 20, 2015, at 3:57 pm, LA Fitness Club Manager Antonio W
3 emails LA Fitness member Jenifer Lewis "the details" of his "PLAN." In the subject line, LA
4 Fitness Club Manager writes: "Emancipation." The "Emancipation" he refers to is being set free,
5 liberated from his managerial position at LA Fitness. "The 120k requested" by LA Fitness Club
6 Manager Antonio W from LA Fitness member Jenifer Lewis is so that he can resign from his
7 managerial position at LA Fitness and still have the equivalent of his "annual salary plus the
8 medical." Once Jenifer Lewis has given "the funds," then LA Fitness Club Manager Antonio W
9 will "give a 2 week notice" to LA Fitness.²²

10 -----Original Message-----
11 From: Tony <[REDACTED]@gmail.com>
12 To: [REDACTED] <[REDACTED]@[REDACTED].com>
13 Sent: Mon, Jul 20, 2015 3:57 pm
14 Subject: Emancipation

15 Here are the details....

16 1. The money amount is about providing the annual
17 salary so I am not hand to mouth each much. Once I quit I am on my own until
18 the
19 next career launches. The money provides a cushion for 12 months to pay the
20 standard bills I pay each month and the medical insurance rates that will
21 increase once I leave the job.
22 The insurance payments are now \$200 a month
23 through LA Fitness for all 3 of us, once I leave LA Fitness it goes to \$435 a
24 month.
25 The monthly income I make is \$8400 a month, the \$120k requested pays the
26 annual salary plus the medical.

27 Once the funds are in I give a 2 week
28 notice
We begin spending more time together and I start advancing my work
Next
I speak with Carolyn about the logistics
Then Carolyn and I speak to the
Children AFTER I get a consensus on how we are going to handle the lodging
etc.
Next your introduction.
Final, We begin to coordinate our move...

29 175. Over the next two days, LA Fitness Club Manager Antonio W and LA Fitness
30 member Jenifer Lewis start planning their lives together, discussing the details. They discuss

31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100
101
102
103
104
105
106
107
108
109
110
111
112
113
114
115
116
117
118
119
120
121
122
123
124
125
126
127
128
129
130
131
132
133
134
135
136
137
138
139
140
141
142
143
144
145
146
147
148
149
150
151
152
153
154
155
156
157
158
159
160
161
162
163
164
165
166
167
168
169
170
171
172
173
174
175
176
177
178
179
180
181
182
183
184
185
186
187
188
189
190
191
192
193
194
195
196
197
198
199
200
201
202
203
204
205
206
207
208
209
210
211
212
213
214
215
216
217
218
219
220
221
222
223
224
225
226
227
228
229
230
231
232
233
234
235
236
237
238
239
240
241
242
243
244
245
246
247
248
249
250
251
252
253
254
255
256
257
258
259
260
261
262
263
264
265
266
267
268
269
270
271
272
273
274
275
276
277
278
279
280
281
282
283
284
285
286
287
288
289
290
291
292
293
294
295
296
297
298
299
300
301
302
303
304
305
306
307
308
309
310
311
312
313
314
315
316
317
318
319
320
321
322
323
324
325
326
327
328
329
330
331
332
333
334
335
336
337
338
339
340
341
342
343
344
345
346
347
348
349
350
351
352
353
354
355
356
357
358
359
360
361
362
363
364
365
366
367
368
369
370
371
372
373
374
375
376
377
378
379
380
381
382
383
384
385
386
387
388
389
390
391
392
393
394
395
396
397
398
399
400
401
402
403
404
405
406
407
408
409
410
411
412
413
414
415
416
417
418
419
420
421
422
423
424
425
426
427
428
429
430
431
432
433
434
435
436
437
438
439
440
441
442
443
444
445
446
447
448
449
450
451
452
453
454
455
456
457
458
459
460
461
462
463
464
465
466
467
468
469
470
471
472
473
474
475
476
477
478
479
480
481
482
483
484
485
486
487
488
489
490
491
492
493
494
495
496
497
498
499
500
501
502
503
504
505
506
507
508
509
510
511
512
513
514
515
516
517
518
519
520
521
522
523
524
525
526
527
528
529
530
531
532
533
534
535
536
537
538
539
540
541
542
543
544
545
546
547
548
549
550
551
552
553
554
555
556
557
558
559
560
561
562
563
564
565
566
567
568
569
570
571
572
573
574
575
576
577
578
579
580
581
582
583
584
585
586
587
588
589
590
591
592
593
594
595
596
597
598
599
600
601
602
603
604
605
606
607
608
609
610
611
612
613
614
615
616
617
618
619
620
621
622
623
624
625
626
627
628
629
630
631
632
633
634
635
636
637
638
639
640
641
642
643
644
645
646
647
648
649
650
651
652
653
654
655
656
657
658
659
660
661
662
663
664
665
666
667
668
669
670
671
672
673
674
675
676
677
678
679
680
681
682
683
684
685
686
687
688
689
690
691
692
693
694
695
696
697
698
699
700
701
702
703
704
705
706
707
708
709
710
711
712
713
714
715
716
717
718
719
720
721
722
723
724
725
726
727
728
729
730
731
732
733
734
735
736
737
738
739
740
741
742
743
744
745
746
747
748
749
750
751
752
753
754
755
756
757
758
759
760
761
762
763
764
765
766
767
768
769
770
771
772
773
774
775
776
777
778
779
780
781
782
783
784
785
786
787
788
789
790
791
792
793
794
795
796
797
798
799
800
801
802
803
804
805
806
807
808
809
810
811
812
813
814
815
816
817
818
819
820
821
822
823
824
825
826
827
828
829
830
831
832
833
834
835
836
837
838
839
840
841
842
843
844
845
846
847
848
849
850
851
852
853
854
855
856
857
858
859
860
861
862
863
864
865
866
867
868
869
870
871
872
873
874
875
876
877
878
879
880
881
882
883
884
885
886
887
888
889
890
891
892
893
894
895
896
897
898
899
900
901
902
903
904
905
906
907
908
909
910
911
912
913
914
915
916
917
918
919
920
921
922
923
924
925
926
927
928
929
930
931
932
933
934
935
936
937
938
939
940
941
942
943
944
945
946
947
948
949
950
951
952
953
954
955
956
957
958
959
960
961
962
963
964
965
966
967
968
969
970
971
972
973
974
975
976
977
978
979
980
981
982
983
984
985
986
987
988
989
990
991
992
993
994
995
996
997
998
999
1000

²² In his "Emancipation" email to LA Fitness member Jenifer Lewis, LA Fitness Club Manager Antonio W refers to "Carolyn." On information and belief, "Carolyn" is the mother of his two (2) children, Bailey and Jordan. Although LA Fitness Club Manager Antonio W always represented to LA Fitness member Jenifer Lewis that "Carolyn" was his ex-wife, it is now known from criminal INFORMATION that Brice Carrington was married "during the calendar year[s]" of 2002, 2003, 2004, and 2005, the years that Brice Carrington was scheming to defraud investors. What is not known is whether LA Fitness Club Manager Antonio W (a/k/a Brice Carrington) and "Carolyn" were ever divorced, and/or whether they were married at the time LA Fitness Club Manager Antonio W was conning LA Fitness member Jenifer Lewis.

1 marriage. He says that he will retire as a Navy SEAL reservist so that there is no fear of him being
2 called to active duty. She agrees to "give him money [...] for his children, [because he told her]
3 that he was going to get the money back from investors for the sound invention that he [...] said he
4 had invented." She decides to make it monetarily possible for him to quit his position at LA
5 Fitness as the Personal Training Manager so that he can pursue his dreams, professionally and
6 personally.

7
8 176. On Wednesday, July 22, 2015, LA Fitness member Jenifer Lewis hands LA Fitness
9 Club Manager Antonio W a check in the amount of \$20,000 made payable to "Antonio M.
10 Wilson." LA Fitness member Jenifer Lewis writes what LA Fitness Club Manager Antonio W
11 asks her to write: "**Emancipation – GIFT**" in the Memo section of the check. However, he
12 assures her it is "an investment" that would enable him to develop a digital device for his sound
13 design invention.²³

14 177. The next day, on Thursday, July 23, 2015, at 9:34 am, LA Fitness Club Manager
15 Antonio W, while in the course and scope of his employment as a Club Manager, calls LA Fitness
16 member Jenifer Lewis from LA Fitness' main telephone number: 818-988-7411.

17 178. On Friday, July 24, 2015, LA Fitness member Jenifer Lewis hands LA Fitness Club
18 Manager Antonio W a check for \$1,000 made payable to Antonio M. Wilson so he can take his
19 daughter, Bailey, and son, Jordan, to Disneyland. The plan is for Antonio W to tell his children
20 while they are at Disneyland about the relationship he has with a woman that he met while
21 working at LA Fitness, Jenifer Lewis.

22 ///

23 ///

24
25 ²³ Unbeknownst to LA Fitness member Jenifer Lewis, the digital device for his sound design invention she is
"investing in" is the identical sound invention for which 'Sound Designer' Brice Carrington was sentenced to four (4)
years for fraud after "masterminding a scheme to defraud investors" out of four million dollars (\$4,000,000.00).

26 *Online Sources:* (1) http://www.prweb.com/releases/sound/ultimate_fx/prweb523772.htm.

(2) <http://www.eastbaytimes.com/2009/09/08/former-pleasanton-investor-who-fabricated-hollywood-background-pleads-guilty/>

(3) <http://www.sfgate.com/crime/article/Fake-Oscar-winner-gets-4-years-for-fraud-3204336.php>.

(4) <http://www.smell-a-rat.com/investment-frauds/> (5) <http://www.investmentnews.com/article/20090908/REG/909089979/1094/INDaily01>.

(6) <http://www.lipstickalley.com/showthread.php/198319-Brice-carrington-he-s-a-fake%21?highlight=brice+carrington>.

(7) <http://designingsound.org/2010/01/sound-designer-brice-carrington-gets-4-years-for-fraud/>.

(8) <http://www.fugitive.com/2009/09/08/pleasanton-man-brice-carrington-who-falsely-claimed-that-he-was-a-three-time-oscar-winner-pleads-guilty/>.

1
2 179. On Friday, July 24, 2015, at 10:04 am, LA Fitness Club Manager Antonio W and
3 LA Fitness member Jenifer Lewis exchange texts while LA Fitness Club Manager Antonio W is in
4 the course and scope of his employment as Club Manager.

5 Yes lunch after
6 Don't let anyone
get on yo nerves
over there. 🙄

7 Baby I'm out!!!!
8 They are putting
on the full court
press

9
10 "Baby I'm out!!!!" is LA Fitness Club Manager Antonio W referring to his giving either
11 his notice or his immediate resignation. "They are putting on the full court press" is LA Fitness
12 Club Manager Antonio W saying that LA Fitness does not want him to leave, that LA Fitness
13 wants him to remain in his managerial position.

14 180. On Saturday, July 25, 2015, LA Fitness Club Manager Antonio W tells LA Fitness
15 member Jenifer Lewis about the day that he had with his children at Disneyland, and how his
16 children reacted when he told them about his relationship with her, and his intention of building a
17 life and a future together with her.

18 181. On Tuesday, July 28, 2015, LA Fitness Club Manager Antonio W tells LA Fitness
19 member Jenifer Lewis that he has retired from the Navy SEAL Reserves and provides her with a
20 copy of his signed Application to be "TRANSFERRED TO RETIRED STATUS" at his "OWN
21 REQUEST."

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

01/06/2017

ENLISTED APPLICATION & ORDERS
TO A NAVAL RESERVE UNIT
TERMINATION/MODIFICATION
CNAVRES 1325/2 (Rev. 9-75) S/N 0117-LF-013-2611

From: Commanding Officer, Special Operations Command, Naval Special Warfare Group 3

DATE
28 July 2015

Senior Enlisted Troop AMCS Antonio M. Wilson
US Naval Amphibious Base Coronado
To: Seal Team 3
2200-2832 Silver Strand Blvd
Coronado, CA 92118
United States

Mail in window envelope, size
9-7/8" x 3-7/8"

Ref: (a) Separation from Active Fitness Readiness SOCOM, NAVSPECWARGRU 3 (Seal Team 3)

1. Reference (a) which authorized your assignment to NAVSPECWARGRU 3

(Unit)

☒ IN PAY STATUS ☐ IN NON-PAY STATUS is hereby:

<input checked="" type="checkbox"/> TERMINATED EFFECTIVE FOR REASONS INDICATED BELOW:	<input type="checkbox"/> MODIFIED EFFECTIVE AS INDICATED BELOW:																
<table border="1"> <tr> <th>ITEM</th> <th>ITEM</th> </tr> <tr> <td><input checked="" type="checkbox"/> INABILITY TO MAINTAIN SATISFACTORY DRILL ATTENDANCE</td> <td>TRANSFER TO _____ IN</td> </tr> <tr> <td><input type="checkbox"/> FAILURE TO PERFORM ANNUAL ACTIVE DUTY FOR TRAINING</td> <td><input type="checkbox"/> DRILL PAY <input type="checkbox"/> NON PAY STATUS</td> </tr> <tr> <td><input type="checkbox"/> NOT RECOMMENDED FOR REAFFILIATION</td> <td>PAY STATUS CHANGE TO _____</td> </tr> <tr> <td><input type="checkbox"/> TRANSFER TO STANDBY RESERVE</td> <td>TRAINING STATUS CHANGE TO _____</td> </tr> <tr> <td><input checked="" type="checkbox"/> TRANSFERRED TO RETIRED STATUS</td> <td>OTHER:</td> </tr> <tr> <td><input checked="" type="checkbox"/> YOUR OWN REQUEST (Records transferred to NRPC)</td> <td>REASON FOR ACTION</td> </tr> <tr> <td><input type="checkbox"/> OTHER</td> <td></td> </tr> </table>	ITEM	ITEM	<input checked="" type="checkbox"/> INABILITY TO MAINTAIN SATISFACTORY DRILL ATTENDANCE	TRANSFER TO _____ IN	<input type="checkbox"/> FAILURE TO PERFORM ANNUAL ACTIVE DUTY FOR TRAINING	<input type="checkbox"/> DRILL PAY <input type="checkbox"/> NON PAY STATUS	<input type="checkbox"/> NOT RECOMMENDED FOR REAFFILIATION	PAY STATUS CHANGE TO _____	<input type="checkbox"/> TRANSFER TO STANDBY RESERVE	TRAINING STATUS CHANGE TO _____	<input checked="" type="checkbox"/> TRANSFERRED TO RETIRED STATUS	OTHER:	<input checked="" type="checkbox"/> YOUR OWN REQUEST (Records transferred to NRPC)	REASON FOR ACTION	<input type="checkbox"/> OTHER		
ITEM	ITEM																
<input checked="" type="checkbox"/> INABILITY TO MAINTAIN SATISFACTORY DRILL ATTENDANCE	TRANSFER TO _____ IN																
<input type="checkbox"/> FAILURE TO PERFORM ANNUAL ACTIVE DUTY FOR TRAINING	<input type="checkbox"/> DRILL PAY <input type="checkbox"/> NON PAY STATUS																
<input type="checkbox"/> NOT RECOMMENDED FOR REAFFILIATION	PAY STATUS CHANGE TO _____																
<input type="checkbox"/> TRANSFER TO STANDBY RESERVE	TRAINING STATUS CHANGE TO _____																
<input checked="" type="checkbox"/> TRANSFERRED TO RETIRED STATUS	OTHER:																
<input checked="" type="checkbox"/> YOUR OWN REQUEST (Records transferred to NRPC)	REASON FOR ACTION																
<input type="checkbox"/> OTHER																	
REMARKS Commanding Officer NAVSPECWARGRU 3 upon request by Senior Enlisted Troop Member AMCS Antonio M. Wilson USN, releases member from Fitness Readiness Status effective immediately. Complete separation physical and classification performed on this date. Security clearances are rescinded immediately and member has been declassified as of this date. All weapons clearances and equipment returned to NAVSPECWARGRU 3. Member maintains Honorable Service distinction.	REMARKS																
COPY TO: MILPERS/SOCOM SERVICE RECORD	SIGNATURE (Name and Rank) AMCS Antonio M. Wilson (E-8)																

182. In the REMARKS section of his Application to be "TRANSFERRED TO RETIRED STATUS" at his "OWN REQUEST," the LA Fitness Club Manager Antonio W writes:

REMARKS Commanding Officer NAVSPECWARGRU 3 upon request by Senior Enlisted Troop Member AMCS Antonio M. Wilson USN, releases member from Fitness Readiness Status effective immediately. Complete separation physical and classification performed on this date. Security clearances are rescinded immediately and member has been declassified as of this date.

All weapons clearances and equipment returned to NAVSPECWARGRU 3. Member maintains Honorable service distinction.

183. On Wednesday, July 29, 2015, LA Fitness member Jenifer Lewis hands LA Fitness Club Manager Antonio W a third check, in the amount of \$20,000 made payable to "Antonio M. Wilson." LA Fitness member Jenifer Lewis writes what LA Fitness Club Manager Antonio W asks her to write: "GIFT" in the Memo section of the check. However, he assures her it is a loan that would enable him to develop a digital device related to his sound design invention.

184. On Friday, July 31, 2015, LA Fitness member Jenifer Lewis introduces LA Fitness Club Manager Antonio W to her former therapist, having completed therapy a few years earlier. LA Fitness member Jenifer Lewis tells her former therapist, "I didn't come here for your approval. We came for your blessing. We're going to build together, and I'm going to help him with his inventions." The three discuss the fact that LA Fitness member Jenifer Lewis is living with bipolar disorder. LA Fitness Club Manager Antonio W recounts stories to her former therapist of his time as a Navy SEAL, one story being "about one of his Seals running into bullets." He compares "running into bullets" to bipolar disorder, and, of the two, describes dealing with bipolar disorder as "a piece of cake."

185. On Saturday, August 1, 2015, LA Fitness Club Manager Antonio W introduces his daughter and son, Bailey and Jordan, to LA Fitness member Jenifer Lewis at her home. Although he claims to have discussed their relationship with his children, the conversation does not include any mention of it.

186. On Tuesday, August 18, 2015, at 8:47 am, LA Fitness Club Manager Antonio W leaves the following message on LA Fitness member Jenifer Lewis's voicemail:

"I just wanted to say, 'Good Morning. I love you.'"

187. On Monday, August 24, 2015, at 2:58 pm, LA Fitness Club Manager Antonio W, while in the course and scope of his employment as a Club Manager, calls LA Fitness member Jenifer Lewis from LA Fitness' main telephone number: 818-988-7411. The purpose of the call was to discuss the investment payment of \$10,000 in Ultimate FX that she had promised. As the two are going to LA Fitness member Jenifer Lewis' credit union, she realizes that she does not

1 have her checkbook with her, so LA Fitness Club Manager Antonio W suggests that she simply
2 have her credit union issue a cashier's check in the amount of \$10,000, which she did.

3
4 188. By this time, LA Fitness member Jenifer Lewis is so trusting of LA Fitness Club
5 Manager Antonio W, so committed to their relationship, so certain of their future together, that on
6 Wednesday, August 26, 2015, LA Fitness Club Manager Antonio W accompanies LA Fitness
7 member Jenifer Lewis to a table read for 'black-ish' on the Disney lot. While on the lot, he points
8 out to her the building in which he allegedly had previously worked performing sound engineering
9 and in which he came up with his sound design invention.

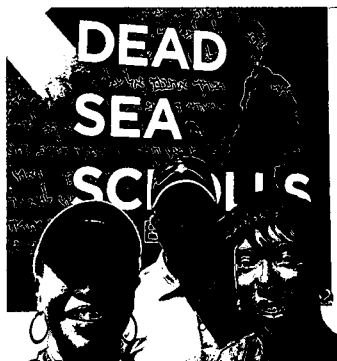
10 189. On Friday, August 28, 2015, at 6:24 pm, LA Fitness Club Manager Antonio W
11 leaves the following message on LA Fitness member Jenifer Lewis's voicemail:

12 "Hey, I was calling you before I was going to turn in. I'm going to turn in
13 early. Anyways, um, give me a jingle. I will see you in the morning. I
14 wanted to know if you wanted me to send you a copy of my paper for the
15 college so that you can see what kind of stuff I write. I'm going to send it to
16 you anyway. Okay. Love you. Bye."

17 190. LA Fitness Club Manager Antonio W tells LA Fitness member Jenifer Lewis that he
18 no longer works at LA Fitness, having [allegedly] resigned his position. Therefore, from Monday,
19 August 31, 2015, through Friday, September 4, 2015, he spends more time with her, visiting at her
20 home daily, as well as accompanying her to the Disney lot for fittings, meeting the entire wardrobe
21 department, and speaking with her videographer regarding taking stills and videos of him to be
22 used to promote his lecture series.

23 191. During this time, LA Fitness Club Manager Antonio W is particularly attentive to
24 LA Fitness member Jenifer Lewis as she receives word that her mother's health is rapidly
25 declining. He tells her that she is lucky to have her mother for as long as she has, as his mother
26 had already passed, and that she is lucky to be able to have spent time with her, as he was out of
27 the country when his mother died and was unable to attend her funeral. LA Fitness Club Manager
28 Antonio W gives LA Fitness member Jenifer Lewis a gift, a black leather wallet, which he said
was all he had from his deceased father. When she refused to accept the gift, he insisted.

1
2 192. On Tuesday, September 1, 2015, LA Fitness Club Manager Antonio W escorts LA
3 Fitness member Jenifer Lewis and her sister to the Science Museum to see the Dead Sea Scrolls
4 exhibit, explaining in great detail about their religious and historical significance, based upon the
5 religious education he received while earning a Masters of Theology at the University of Oxford at
6 St. Peter's College (1994-1997) and a Doctorate of Philosophy in Theology at University of
7 Oxford at Christ Church.²⁴



8
9
10
11
12 LA Fitness member Jenifer Lewis' visit with her sister is bittersweet, as they are informed
13 that their mother's already failing health is worsening, becoming critical.

14
15 As LA Fitness member Jenifer Lewis' despondency and melancholy grow in proportion to
16 her mother's declining health, LA Fitness Club Manager Antonio W comforts her with tenderness
17 and compassion.

18 193. On Thursday, September 3, 2015, at 8:34 am, LA Fitness Club Manager Antonio W
19 leaves a series of voicemails in which he attempts to console LA Fitness member Jenifer Lewis
20 about her mother's declining health:

21 "Hey, I just wanted you to hear something this morning: I love you.
22 Have a good day."

23
24
25 ²⁴ Unbeknownst to LA Fitness member Jenifer Lewis, the *online* representations of LA Fitness Club Manager Antonio
26 W's formal education, as they appear on his *LinkedIn* page, falsely represent that he is a two-time graduate from the
27 University of Oxford. His *online* resume directly under his name falsely claims that he is "Committed to Biblical
28 Research," and cites imaginary examples of his scholarly background. "Dr. Antonio M. Wilson's scholarly
background includes a period supporting the Institute of Archeology [sic] at the Hebrew University of Jerusalem while
it conducted an investigation of a site more ancient than the Wailing Wall." *Online Sources:*
<https://www.linkedin.com/in/antoniomwilson> and <https://www.resumonk.com/5GpJeuJuWxNDyS9Ngfwl4w>.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

At 3:04 pm, Antonio W leaves a second voicemail:

“Just calling to say I love you.”²⁵

194. On Monday, September 7, 2015, at 3:07 pm, LA Fitness Club Manager Antonio W leaves the following voicemail:

“Hey, just wanted you to know that you are being thought of. Love you. Talk to you in a little bit.”

195. Subsequently, LA Fitness member Jenifer Lewis’ mother’s health takes a turn for the worse and she is placed on life support.

196. On Thursday, September 10, 2015, LA Fitness member Jenifer Lewis is informed that her critically ill mother’s wishes not to remain on life support will be honored and she will be taken off all life support the following morning.

197. On the afternoon of Thursday, September 10, 2015, LA Fitness member Jenifer Lewis confides in her manager, Julia Walker, that the support and comfort she gets from LA Fitness Club Manager Antonio W, and her vision of their life together, are the only things getting her through the despair over her mother’s illness and imminent death. LA Fitness member Jenifer Lewis shares with Julia Walker that she wishes her mother could live long enough to see her married to LA Fitness Club Manager Antonio W. This statement takes Julia Walker aback, as she feels her friend is inappropriately focused on LA Fitness Club Manager Antonio W, when her focus should be on her dying mother. Julia Walker is also concerned that talk of marriage is entirely premature, especially given LA Fitness Club Manager Antonio W’s extreme religious beliefs.

///

///

²⁵ Unbeknownst to LA Fitness member Jenifer Lewis, on September 4, 2012, at 6:28 pm, three (3) years (less one day) earlier, a post appeared on the *online* website *Fugitive Watch* under the article titled “Pleasanton Man Brice Carrington Who Falsely Claimed That He Was A Three-Time Oscar-Winner Pleads Guilty.” ***The post read: “You should see brice [sic] now. He’s writing a book in prison about the bible and has a publisher. Make sure you get your money from him.”*** (Emphasis added.) *Online Sources:* <http://www.fugitive.com/2009/09/08/pleasanton-man-brice-carrington-who-falsely-claimed-that-he-was-a-three-time-oscar-winner-pleads-guilty/>.

1 Julia Walker expresses her concern to LA Fitness member Jenifer Lewis that a marriage to
2 LA Fitness Club Manager Antonio W seems unwise considering their diametrically opposing
3 beliefs.

4 However, LA Fitness member Jenifer Lewis tells Julia Walker that she is convinced that
5 they are a happy couple who can work out their differences regarding their respective beliefs.
6 Repeating what LA Fitness Club Manager Antonio W has told her, she cites the marriage of Mary
7 Matalin and James Carville, who are successfully married despite their differing political beliefs.
8

9 To appease Julia Walker, LA Fitness member Jenifer Lewis agrees to ask a series of
10 questions, devised by Julia Walker, to LA Fitness Club Manager Antonio W during the couple's
11 scheduled coffee date the next morning. Julia Walker designs the questions specifically to provoke
12 LA Fitness Club Manager Antonio W.

13 That evening, Julia Walker decides to find out more about LA Fitness Club Manager
14 Antonio W. Armed with only his name, "Antonio Wilson," and without the benefit of his date of
15 birth, Driver's License number, or Social Security number, Julia Walker *simply searches online*.

16 **D. "TONY, I HAVE BEEN GIVEN SOME INFORMATION ABOUT YOU THAT IS**
17 **BEYOND DISTURBING."**

18 198. On Friday, September 11, 2015, as planned, LA Fitness Club Manager Antonio W
19 comes to LA Fitness member Jenifer Lewis' home in the morning to have her
20 photographer/videographer take stills and videos of him to be used to promote his lecture series.
21 LA Fitness Club Manager Antonio W uses a photograph that is taken in her backyard during that
22 session for all of his promotional material.²⁶



23
24
25
26
27 ²⁶ LA Fitness Club Manager Antonio W uses the photograph taken on September 11, 2015, to promote his current
28 con, including, but not limited to, on the back cover of his self-published books, *Behind The Faith: REVELATION* and
Behind the Faith: ADVANCED CITIZENSHIP. Online Sources (include, but are not limited to):
<https://www.linkedin.com/in/antoniomwilson> and <http://www.blogtalkradio.com/behindthefait>.

1
2 199. Afterward, the two go to Starbucks where LA Fitness member Jenifer Lewis poses a
3 series of questions to him designed by Julia Walker to expose that his religious beliefs are
4 incompatible with her lifestyle and values. When he asks where the questions came from, LA
5 Fitness member Jenifer Lewis explains to him that Julia Walker is worried about her getting
6 married so quickly with such a conservatively religious man. In response, LA Fitness Club
7 Manager Antonio W becomes angry and dismissive toward LA Fitness member Jenifer Lewis, and
8 reminds her that she has promised to provide him with another check the next morning.

9 200. On Friday, September 11, 2015, at approximately 10:00 am, shortly after LA Fitness
10 Club Manager Antonio W and LA Fitness member Jenifer Lewis arrive back at her home, Jenifer
11 Lewis' manager, Julia Walker, arrives and makes up an excuse to be able to speak with her client
12 alone.

13 201. At that time, Julia Walker presents evidence that she found – *simply by going online*
14 – that LA Fitness Club Manager Antonio W is a FRAUD, that he is a convicted felon on parole,
15 having conned investors in his sound effects invention out of \$4 million, that the name under
16 which he was convicted is Brice Carrington, and that he has intentionally done irreparable harm to
17 innocent victims, ruining many lives.

18 202. Now shocked and frightened, LA Fitness member Jenifer Lewis makes up an excuse
19 as to why LA Fitness Club Manager Antonio W has to leave immediately. He becomes suspicious.
20 He knows something is wrong. She walks him to his car “like everything was all right,” because
21 she always walks him to his car. However, because she is unable to kiss him, as she has always
22 done before, and because he is already irritated by Julia Walker's questions, he becomes even
23 more suspicious. LA Fitness Club Manager Antonio W grabs her by her arm and tells her that
24 “I'm coming here tomorrow for that money. I need that money for my kids, like you promised.”
25 They had planned for him to pick up a check in the agreed-upon amount of \$30,000.00 “as part of
26 the investment.” She agrees. He leaves, telling her that he will check in later regarding her mother.

27 203. Then the call comes that her mother passed away.
28

1
2 204. Within approximately one hour, LA Fitness member Jenifer Lewis experiences two
3 traumatic life-changing events. The first life-changing event is when she learns that the man that
4 she loves, the man with whom she is planning on spending the rest of her life – her Navy SEAL,
5 Oxford-educated, Ph.D. boyfriend with whom she has invested her so much of her love in such a
6 short period of time – is a career criminal and a Convicted-Felon-Con-Artist. The second life-
7 changing event is when she is notified shortly thereafter that her mother passed away.

8 205. These two events leave LA Fitness member Jenifer Lewis numb, shocked and
9 immobilized. She goes into a meltdown of grief.

10 206. At 1:46 pm on Friday, September 11, 2015, LA Fitness Club Manager Antonio W
11 leaves the following (and last) voicemail:

12 “Hey, Sweetie, I just wanted to be among those that are calling you
13 to tell you that I am here for you. I love you and there are better
14 days ahead. I’ll talk to you later on. Bye-Bye.”

15 207. At approximately 2:30 pm on Friday, September 11, 2015, LA Fitness member
16 Jenifer Lewis, instead of mourning her mother’s death, taking condolence calls, and commiserating
17 with her family, is forced to muster all her strength to go the police department in Van Nuys in an
18 attempt to have the LA Fitness Club Manager arrested, as she feels that her life has been
19 threatened and that he is a threat to public safety.

20 208. LAPD informs the LA Fitness member that because she had willingly given him
21 money, albeit under fraudulent circumstances, that she did not have a case. LAPD did, though,
22 advise her to get a Temporary Restraining Order (TRO) and to call, email and text the LA Fitness
23 Club Manager Antonio W telling him not to contact her in any manner, so that if he does contact
24 her after being instructed not to do so, then she would have documentation of harassment.

25 209. As instructed by the LAPD, on Friday, September 11, 2015, LA Fitness member
26 Jenifer Lewis goes to court to obtain a Temporary Restraining Order (TRO), only to find that the
27 window has already closed for the weekend.
28

1
2 210. As instructed by the LAPD, on Friday, September 11, 2015, LA Fitness member
3 Jenifer Lewis calls and texts LA Fitness Club Manager Antonio W to instruct him not to contact
4 her again.

5 211. At 6:40 pm, LA Fitness member Jenifer Lewis texts that she has "been given some
6 information about [him] that is beyond disturbing. I need to figure things out. Please do not
7 contact me at all."

Fri, Sep 11, 6:40 PM

8 Tony I have been
9 given some
10 information about
11 you that is beyond
12 disturbing. I need
13 to figure things
14 out. Please do not
15 contact me at all.

16 212. On Sunday, September 13, 2015, Julia Walker found – **simply by searching online**
17 – the *San Francisco Chronicle* article titled "Fake Oscar Winner Gets 4 Years For Fraud."²⁷

18 213. On Tuesday, September 15, 2015, LA Fitness member Jenifer Lewis contacts the
19 Department of Children and Family Services (DCFS) Hotline to tell them a convicted felon
20 currently on probation had used his two (2) children, Bailey and Jordan, as pawns, as props, in
21 furtherance of his con, and that she believes the children need protection from their Convicted-
22 Felon-Con-Artist father.²⁸

23 214. On Wednesday, September 16, 2015, Julia Walker emails directly with one of Brice
24 Carrington's investment victims, William Clay Cunningham. Cunningham spoke at Brice
25 Carrington's sentencing hearing, and, after the hearing, when he "tried to take a picture of
26

27 ²⁷ Unbeknownst to LA Fitness member Jenifer Lewis, exactly two (2) years earlier, on September 13, 2013, Brice
28 Carrington (a/k/a LA Fitness Club Manager Antonio W), Inmate Number 14020-111, was released from federal
prison for defrauding investors of nearly \$4 million in an investment scheme. Online Source:
<http://www.bop.gov/inmateloc/>.

²⁸ Unbeknownst to LA Fitness member Jenifer Lewis, exactly six (6) years earlier, on September 15, 2009, at 3:35
pm, Brice Carrington (a/k/a LA Fitness Club Manager Antonio W), after he had already pleaded guilty to federal wire
fraud and tax evasion charges (September 8, 2009), tweeted "My Oscar statues are getting lonely, I could use
another!" Online Source: <http://designingsound.org/2010/01/sound-designer-brice-carrington-gets-4-years-for-fraud/>.

1 Carrington with his cell in the courthouse hallway,” had his phone “knocked to the ground” by
2 Carrington’s “family members.”²⁹ It was Cunningham’s belief that Brice Carrington/Dr. Antonio
3 A. Wilson’s wife, Carolyn Naomi Carrington Wilson, was an active participant in all his cons.³⁰
4

5 215. On Thursday, September 17, 2015, LA Fitness member Jenifer Lewis files for and is
6 granted a TRO against Antonio Wilson, a/k/a Antonio M. Wilson, a/k/a Tony Wilson, a/k/a Brice
7 Carrington, LA County Court Case No. LQ019105.

8 216. Question 4 of the Request for Domestic Violence Restraining Order asks: “What is
9 your relationship to the person [you want protection from]?” LA Fitness member Jenifer Lewis
10 checked box ‘f.’ – “We are dating or used to date, or we are or used to be engaged to be married.”

11 217. The Court sets a hearing date for October 5, 2015, at 8:30 am in Department NWL.

12 218. On Thursday, September 17, 2015, the same date that LA Fitness member Jenifer
13 Lewis files and is granted a TRO against the LA Fitness Club Manager Antonio W, a/k/a Antonio
14 Wilson, a/k/a Antonio M. Wilson, a/k/a Tony Wilson, a/k/a Brice Carrington, he self-produces and
15 self-narrates another podcast on soundcloud.com – “Name Of God - YHWH.”



20 *Online Source:* <https://mobile.twitter.com/amariotw>.

21 219. In due course, LA Fitness member Jenifer Lewis provided a conformed copy of the
22 TRO to the LA County Sherriff’s Department for Service of Process. According to the service
23

24 ²⁹ According to the *San Francisco Chronicle*, “After the hearing, [...] Carrington’s attorney, Randy Sue Pollock,
25 and family members **shouted at Cunningham in protest...**”. Randy Sue Pollock brags *online*, “**Randy Sue Pollock**
26 **garnered another victory** when four counts of wire fraud and several counts of tax evasion were dismissed against
her client, Brice Carrington [who] was facing 20 years for tax evasion and 20 years for wire fraud if convicted.”
(Emphasis added.) *Online Sources:* <http://www.rspollocklaw.com/u-s-v-carrington-ndca-oakland-2010/> and
<http://www.sfgate.com/crime/article/Fake-Oscar-winner-gets-4-years-for-fraud-3204336.php>.

27 ³⁰ On December 28, 2009, Randy Sue Pollock files “Defendant’s Sentencing Memorandum” – *United States v.*
28 *Carrington*, CR09-0791 DLJ, Doc. 10, (N.D. Cal., 2009) – in which she (incorrectly) predicts: “**The separation from**
his family will be very difficult but it will teach him a lesson he will never forget. He is fortunate to have lovely
wife and a loving and very supportive family.” (Emphasis added.)

1 report, the man who answered the door at the home identified himself as Wilson's father-in-law
2 and said the Respondent – LA Fitness Club Manager Antonio W, a/k/a Antonio Wilson, a/k/a
3 Antonio M. Wilson, a/k/a Tony Wilson, a/k/a Brice Carrington – had moved from that address
4 several months previously and no longer resides at that address.
5

6 220. On Monday, September 21, 2015, LA Fitness member Jenifer Lewis goes to the LA
7 Fitness Van Nuys facility to work out. She goes because she believes that LA Fitness Club
8 Manager Antonio W, a/k/a Antonio Wilson, a/k/a Antonio M. Wilson, a/k/a Tony Wilson, a/k/a
9 Brice Carrington is no longer employed at LA Fitness, because he had told her he had resigned.
10 Sometime after she learned of his true identity, she confirmed this by checking LA Fitness'
11 website and seeing that LA Fitness Club Manager Antonio W's name was no longer listed as a
12 manager of the Van Nuys facility. Therefore, because she is certain that LA Fitness Club Manager
13 Antonio W will not be there, LA Fitness member Jenifer Lewis feels safe to return to the LA
14 Fitness Van Nuys facility. However, when she walks into the gym, she is shocked to discover LA
15 Fitness Club Manager Antonio W, a/k/a Antonio Wilson, a/k/a Antonio M. Wilson, a/k/a Tony
16 Wilson, a/k/a Brice Carrington is either still an employee of LA Fitness (having never resigned) or
17 that LA Fitness has rehired him.

18 E. **“TONY, I'M WRITING THIS TO INFORM YOU OF THE CONVERSATION I**
19 **HAD WITH JENIFER LEWIS – SHE CONTACTED [ME] MAKING**
20 **ACCUSATIONS THAT YOU WERE A FRAUD AND A CON ARTIST.”**

21 221. Knowing that he hasn't yet been served with the TRO, LA Fitness member Jenifer
22 Lewis immediately contacts her friend and manager Julia Walker, and then they both contact
23 LAPD. Shortly thereafter, LAPD Officers Drucker and Ramirez, dressed in full uniform, with
24 firearms, arrive at LA Fitness to serve the TRO. Both LAPD officers speak directly with LA
25 Fitness Facility Director Tim Caballero. Both LAPD officers explain to LA Fitness Facility
26 Director Tim Caballero that the purpose of their being at the LA Fitness Van Nuys facility, the
27 facility that he is in charge of, is to serve the TRO on LA Fitness Club Manager Antonio W.
28 When LA Fitness Club Manager Antonio W is finished speaking with an LA Fitness member, LA

1 Fitness Facility Director Tim Caballero escorts the LAPD officers to his subordinate's desk.
2 LAPD Officers Drucker and Ramirez then lead LA Fitness Club Manager Antonio W into the Kids
3 Klub area, where they serve the TRO upon him at 3:30 pm. To prevent LA Fitness Club Manager
4 Antonio W from claiming that he was not served, Julia Walker videotapes him being served with
5 the TRO.
6

7 222. Approximately one hour later, on Monday, September 21, 2015, at 4:33 pm, Julia
8 Walker calls the LA Fitness Van Nuys facility and asks to speak with LA Fitness Club Manager
9 Antonio W's supervisor. She is connected to LA Fitness Facility Director Tim Caballero.

10 223. Julia Walker tells LA Fitness Facility Director Tim Caballero that, as he knows, the
11 police were just there to serve his subordinate, Antonio W, with a TRO because he is a convicted
12 felon who stalked her friend.

13 224. Julia Walker tells LA Fitness Facility Director Tim Caballero that his subordinate,
14 Antonio W, is a con artist.

15 225. Julia Walker tells LA Fitness Facility Director Tim Caballero that his subordinate,
16 Antonio W, should be fired.

17 226. Julia Walker tells LA Fitness Facility Director Tim Caballero that his subordinate,
18 Antonio W, "is probably stalking and abusing other members."

19 227. LA Fitness Facility Director Tim Caballero tells Julia Walker that he could not
20 discuss Antonio W with her because "it is an HR issue."

21 228. Julia Walker continues. She tells LA Fitness Facility Director Tim Caballero that his
22 subordinate, Antonio W, had conned a member out of over \$50,000.

23 229. LA Fitness Facility Director Tim Caballero then informs Julia Walker, whom he
24 believes is Jenifer Lewis, "that she needs to stop making these accusations to [Anthony W's]
25 manager without any proof."

26 230. LA Fitness Facility Director Tim Caballero then "advised her [that he] can no longer
27 speak to her and that [LA Fitness member Jenifer Lewis] should not go to this location anymore."
28

1
2 231. By LA Fitness Facility Director Tim Caballero "advising" LA Fitness member Jenifer
3 Lewis that he "can no longer speak to her and that [LA Fitness member Jenifer Lewis] "should not
4 go to this location anymore," LA Fitness Facility Director Tim Caballero retaliates against LA
5 Fitness member Jenifer Lewis for knowing, and for acknowledging that she knew, of LA Fitness
6 Club Manager Antonio W's criminal history – and **his current con.**

7 232. LA Fitness is attempting to cover up what LA Fitness already knew about LA Fitness
8 Club Manager Antonio W's criminal history – and **his current con** – that he is committing on LA
9 Fitness member Jenifer Lewis. On information and belief, LA Fitness' interest in so doing, is part
10 of a larger conspiracy to continue the fraud and/or were conscious of their own guilt.

11 233. On Tuesday, September 22, 2015, LA Fitness member Jenifer Lewis spoke to Agent
12 Cindy Lin at the IRS Criminal Investigation Unit. The next day, LA Fitness member Jenifer Lewis
13 sends the cancelled checks to IRS Agent Lin because in the Memo section, LA Fitness member
14 Jenifer Lewis wrote what LA Fitness Club Manager Antonio W asked her to write: "**GIFT.**"

15 234. On Friday, September 25, 2015, IRS Agent Lin calls Julia Walker. She says that she
16 had received the cancelled checks and that "we are going to contact his probation officer."

17 235. On Monday, September 28, 2015, Julia Walker calls the LA Probation Office. She
18 tells the representative that LA Fitness Club Manager Antonio W had conned LA Fitness member
19 Jenifer Lewis out of money and that she had the LAPD serve him with a TRO. Julia Walker
20 provided the representative with Antonio W's name, alias, Inmate Number, the TRO number and
21 the IRS Agent's contact information, telling the representative that he is repeating the fraud for
22 which he was jailed.

23 236. On Monday, September 28, 2015, in anticipation of the TRO hearing scheduled for
24 October 5, 2015, at 8:30 am in Department NWL, LA Fitness Facility Director Tim Caballero
25 provides his subordinate with an email regarding his conversation with Julia Walker, who he
26 mistakenly believes was LA Fitness member Jenifer Lewis, in order that his subordinate, Antonio
27 W, can use it as an exhibit at the hearing on the TRO to help him defeat LA Fitness member
28 Jenifer Lewis' request that a permanent restraining order be issued.

Jenifer Lewis - Tony Wilson FITDIR/VAN NUYS - SEPULVEDA BLVD.

Page 1 of 1

Jenifer Lewis

Tim Caballero OFCMGR/VAN NUYS - SEPULVEDA BLVD.

Mon 9/28/2015 5:04 PM

To: Tony Wilson FITDIR/VAN NUYS - SEPULVEDA BLVD. <tony.wilson@fitnessintl.com>;

Tony,

I'm writing this to inform you of the conversation I had with Jenifer Lewis - she contacted making accusations that you were a fraud and a con artist. I informed Ms. Lewis that she needs to stop making these accusations to your manager without any proof. Ms Lewis continued to make comments. I advised her I can no longer speak to her and that she should not go to this location anymore.

Let me know if there is anything else you need.

Tim Caballero

[...]

<https://owa.lafitness.com/OWA/>

9/28/2015

237. LA Fitness Facility Director Tim Caballero sends the above email to LA Fitness Club Manager Antonio W's email account at LA Fitness:

To: Tony Wilson FITDIR/VAN NUYS - SEPULVEDA BLVD. <tony.wilson@fitnessintl.com>;

238. LA Fitness Facility Director Tim Caballero sends the above email to LA Fitness Club Manager Antonio W at LA Fitness Club Manager Antonio W's request, concluding his email with an offer to provide any assistance, if needed: "Let me know if there is anything else you need."³¹

239. On information and belief, LA Fitness' corporate office advises LA Fitness Facility Director Tim Caballero to protect LA Fitness Club Manager Antonio W because he is one of LA Fitness' top sales performers.³²

³¹ According to LA Fitness' Employee Handbook, under the section *GENERAL RULES OF CONDUCT*: "[T]here is certain conduct which will result in disciplinary action up to and including *immediate dismissal*. [...] [T]he following are some examples of conduct not tolerated by the Company: (L) Falsifying or making a material omission on a employment application or making erroneous entries or material omissions on L.A. Fitness records[.]" (Emphasis added.) Online Source: <https://www.scribd.com/document/255060469/Employee-Handbook>.

1
2 240. LA Fitness Facility Director Tim Caballero sends the email – wherein he believes that
3 accusations that his subordinate is “a fraud and a con artist” – in an effort to assist LA Fitness Club
4 Manager Antonio W in conning LA Fitness member Jenifer Lewis out of \$50,000.00.

5 241. On information and belief, LA Fitness Facility Director Tim Caballero receives either
6 a portion of the \$50,000.00, or some other consideration, for his efforts.

7 242. The only reason for LA Fitness Facility Director Tim Caballero to write the email is
8 so that LA Fitness Club Manager Antonio W could use it against LA Fitness member Jenifer
9 Lewis in Court, and in furtherance of his con.

10 243. LA Fitness Facility Director Tim Caballero had no interest in discussing whether or
11 not an LA Fitness Club Manager victimized a member of LA Fitness.³³

12 244. On October 2, 2015, LA Fitness Club Manager Antonio W’s attorney, Peirpont M.
13 Laidley, files his Response to Request for Domestic Violence Restraining Order.

14 245. In Question 4 of the Response to Request for Domestic Violence Restraining Order,
15 LA Fitness Club Manager Antonio W, under penalty of perjury, states he does “not agree” he and
16 LA Fitness member Jenifer Lewis were “dating or used to date, or we are or used to be engaged to
17 be married.” The form asks him to “Specify your reasons in item 24, page 4, of this form.”

18 ///

19 ///

20 ///

21 ///

22
23 ³² On information and belief, LA Fitness’ corporate office protects LA Fitness Club Manager Antonio W because he
24 is one of LA Fitness’ top sales performers, and LA Fitness corporate office knows that a career con artist is uniquely
25 suited to “sell/con” its LA Fitness members into purchasing a “Personal Training Agreement” during a
26 “complimentary one-hour fitness assessment with [its] training staff.” **According to LA Fitness’ website, under the**
27 **“Personal Training” tab, “Every member receives a complimentary one hour fitness assessment with our**
28 **training staff.”** (Emphasis added.) *Online Sources:* <https://www.lafitness.com/Pages/PersonalTrainingGeneral.aspx>.

29 ³³ According to LA Fitness’ Employee Handbook, under the section *MEMBER RELATIONS*: “It is the policy of L.A.
30 Fitness to provide its members with the best possible service. Employees are expected to treat members in a
31 courteous, respectful manner at all times. **Employees should always remember that, in most situations, the**
32 **member comes first.** [...] **Employees should be prepared to listen to member inquiries and complaints and then**
33 **deal with them in a responsive, professional manner.”** (Emphasis added.)
34 *Online Source:* <https://www.scribd.com/document/255060469/Employee-Handbook>.

1 **(24) [x] Reasons I Do Not Agree to the Orders Requested**

2 Explain your answers to each of the orders requested (*give specific facts and reasons*):

3 ☐ Check here if there is not enough space below for your answer. Put your complete answer on an attached sheet
4 of paper and write, "DV-120, Reasons I Do Not Agree" as a title.

5 I, ANTONIO WILSON declare as follow:

6 I never threatened, annoyed, harassed nor physically grabbed Jennifer Lewis, I never demanded money nor
7 threatened Ms. Lewis. I have always conducted myself as a gentleman in her presence.

8 Ms. Jennifer Lewis wrongfully attempted to have me fired from my job. See the email from my employer marked
9 Exhibit "A" attached hereto and made a part hereof.

10 I agree the joint and mutual restraining orders for Jennifer Lewis and myself in which each of us are restrained in
11 our personal conducted, stay away order.

12 I declare under penalty of perjury that the foregoing is true and correct and that this Declaration was executed on
13 October 2, 2015 at Los Angeles, California

14 246. LA Fitness Facility Director Tim Caballero's September 28, 2015, email to LA
15 Fitness Club Manager Antonio W, evidencing the September 21, 2015, telephone call from Julia
16 Walker, is attached to his Response to the Request for A Permanent Restraining Order as Exhibit
17 A. It is presented as proof that LA Fitness member "Jenifer Lewis wrongfully attempted to have
18 [LA Fitness Club Manager Antonio W] fired from [his] job." However, it is also proof that LA
19 Fitness Facility Director Tim Caballero is informed that his subordinate, Antonio W, is a 'con
20 artist,' 'fraud,' and 'convicted felon who stalked a member,' and who is 'probably stalking and
21 abusing other members,' and should be 'fired.' It is also proof that the only action LA Fitness
22 Facility Director Tim Caballero takes after being so informed, is to advise the member that 'she
23 needs to stop making these accusations to [him], that he 'can no longer speak to her,' and 'that she
24 should not go to this location anymore.'"

25 247. The hearing is held on October 5, 2015, at 8:30 am, as scheduled, and is presided
26 over by the Honorable Alicia Y. Blanco, Commissioner. In attendance are: (1) LA Fitness
27 member Jenifer Lewis; (2) Julia Walker, her manager and friend; (3) LA Fitness Club Manager
28 Antonio W; and, (4) Pierpont M. Laidley, his attorney.

Online Source: <http://www.lacourt.org/casesummary/ui/casesummary.aspx?>

///

1
2 248. On information and belief, LA Fitness Facility Director Tim Caballero approves LA
3 Fitness Club Manager Antonio W to take time off from his managerial duties to attend the court
4 hearing against him brought by LA Fitness member Jenifer Lewis, asking that the court issue an
5 order permanently restraining him from contacting her.

6 249. At the hearing on October 5, 2015, according to the Reporter's Transcript of
7 Proceedings, the Hon. Alicia Y. Blanco asks:

8 THE COURT: It's your case, ma'am. So would you like to tell me why
9 you feel you need a permanent restraining order in this case?

10 THE PETITIONER: Yes, ma'am. It's okay if I read because I'm a little
11 nervous? It's just short – My name is Jenifer Lewis. I'm an actress, activist, public
12 figure. **I'm a victim of Antonio M. Wilson, a.k.a. Brice Carrington. In April**
13 **2015 Tony Wilson approached me at L.A. Fitness where I am a member and**
14 **presented himself to me as a manager of personal training.** (Emphasis added.)

15 250. The intent of LA Fitness Facility Director Tim Caballero's email was to both
16 protect LA Fitness Club Manager Antonio W and to turn the tables on LA Fitness member Jenifer
17 Lewis by trivializing her charges as those of a scorned lover. In so conspiring, LA Fitness Facility
18 Director Tim Caballero again breached his fiduciary duty to LA Fitness member Jenifer Lewis.

19 251. LA Fitness Facility Director Tim Caballero's September 28, 2015, email to LA
20 Fitness Club Manager Antonio W, evidencing the September 21, 2015, telephone call, is the
21 **ONLY** exhibit that Mr. Laidley submits on behalf of his accused client.

22 252. At the hearing on October 5, 2015, according to the Reporter's Transcript of
23 Proceedings, the Hon. Alicia Y. Blanco asks LA Fitness Club Manager Antonio W's attorney, Mr.
24 Laidley, if his client has any exhibits. Mr. Laidley responds:

25 MR. LAIDLEY: No exhibits. There is attached to the response an e-mail
26 from my client's employer to him, indicating that Ms. Lewis came to his job, or
27 called him, rather, and was calling him and encouraged the manager to fire my
28 client, and that should be Exhibit A as part of the response.

THE COURT: Okay. I have that.

1
2 253. According to the Reporter's Transcript of Proceedings on October 5, 2015, under
3 cross-examination of LA Fitness member Jenifer Lewis, Mr. Laidley asks whether she contacted
4 the manager at LA Fitness to have the company fire LA Fitness Club Manager Antonio W, and she
5 answers.

6 BY MR. LAIDLEY:

7 Q. Did you call the manager at the health club and tell them to fire
8 my client?

9 A. No. My friend sitting here in court did that.

10 Q. All right. And did you contact Child Services in order to enact
11 revenge against my client?

12 A. Not revenge. I wanted to save those children. This man is
13 completely insane, and I wanted to get those children away from him. I adopted a
14 little girl. I became her legal guardian right here in this courtroom. I love children.
15 He's dangerous, and you know it.

16 [...]

17 Q. My next question is did you contact his parole officer?

18 A. Oh, we called the office. He's going down, honey. He's going
19 down. Has he reported the \$50,000 I gave him for taxes that he told me to write
20 "gift" on? You want answers, I'll give you answers. Let's go.

21 [...]

22 MR. LAIDLEY: I have no other questions at this time, Your Honor.

23 THE COURT: Thank you.

24 Okay. Ms. Lewis, do you have anything in response that you would like to
25 briefly –

26 THE PETITIONER: Absolutely nothing. He's a handsome guy. My guess
27 is he's got so many of those poor girls at L.A. Fitness, conning them. He was
28 always on the phone. I'm sure he's got so many scams going on. [...] (Emphasis
added.)

254. According to the Reporter's Transcript of Proceedings, under direct examination of
his client, Mr. Laidley inquires as to whether LA Fitness member Jenifer Lewis attempted to have
him 'fired from his job' and as to whether he felt threatened and afraid of her.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BY MR. LAIDLEY:

Q. Sir, did you grab Ms. Lewis' arm and in any way threaten her that she had to make money available to you?

A. No. No.

Q. Okay. You've answered my question. Okay. Did she attempt to have you fired from your job?

A. Yes.

Q. **Do you feel threatened and afraid of all of the things that she's testified to here about her efforts to try to get you either incarcerated or having your children taken away from you? Are you afraid of those things? Yes or no?**

THE PETITIONER: He's a better actor than I am. It's amazing.

MR. LAIDLEY: It is amazing.

Q. Were you afraid that she can injure you?

A. Yes. (Emphasis added.)

255. Despite LA Fitness' best efforts, and notwithstanding LA Fitness Club Manager Antonio W's testimony to the contrary, the Court finds "the parties have established a relationship as specified in Family Code Section 6211, namely they had a former dating relationship."

256. In addition, "The Court finds that abuse did occur within the meaning of Family Code Section 6203, namely placing the Petitioner in a reasonable apprehension of imminent or serious bodily injury."³⁴

257. Most importantly, "the Court accepts some testimony that Respondent engaged in behavior against Petitioner that has been or could be enjoined under 6220, subsection (7), the subsection that deals with credibly impersonating."

³⁴ According to LA Fitness' Employee Handbook, under the section *THEATS AND VIOLENCE*: "Our company will not tolerate any form of workplace violence or threats of harm against any other person either at or away from work. [...] Employees who engage in such improper conduct are subject to immediate termination." *Online Source*: <https://www.scribd.com/document/255060469/Employee-Handbook>.

01/06/2017

1 THE COURT: I have heard enough.

2 I am finding that the parties have established a
3 relationship as specified in Family Code Section 6211,
4 namely they had a former dating relationship. The Court
5 finds that abuse did occur within the meaning of Family Code
6 Section 6203, namely placing the Petitioner in a reasonable
7 apprehension of imminent or serious bodily injury.

8 And there is also another subsection which could
9 apply in this case in that the Court accepts some testimony
10 that Respondent engaged in behavior against Petitioner that
11 has been or could be enjoined under 6220, subsection (7),
12 the subsection that deals with credibly impersonating.

258. The Court does not issue a permanent restraining order "because it does not believe that whatever situation arose in your particular case – and I understand that this man might be a master manipulator and I understand that he might have pulled a master act on you and made you loan or give him money under false pretenses, and all that is regrettable. It is regrettable. [...]" The Court finds Petitioner failed to satisfy her burden of proof necessary for its issuance.

259. After the Court finds that LA Fitness Club Manager Antonio W placed a member with whom he was in a "dating relationship" in "a reasonable apprehension of imminent or serious bodily injury," and after the Court accepts testimony that he "engaged in behavior against" the member regarding his "impersonating," LA Fitness once again breaches its fiduciary duty – not only to LA Fitness member Jenifer Lewis, but to all LA Fitness members – by welcoming its Convicted-Felon-Con-Artist Club Manager back to his position of authority with open arms.³⁵

³⁵ In the "JUDGMENT IN A CRIMINAL CASE" – *United States v. Carrington*, CR09-0791 DLJ, Doc. 14, (N.D. Cal., 2009) – under the section "SPECIAL CONDITIONS OF SUPERVISION," it states: "**The defendant shall not commit another federal, state, or local crime.**"

In *Lewis v. Wilson*, LA Sup. Ct. Case No. LQ019105 (Dept. NW L, 2015), when the Court found that "**abuse did occur within the meaning of Family Code Section 6203,**" LA Fitness Club Manager Antonio W/Brice Carrington was still within his probationary period.

In the "Report on Offender Under Supervision" – *United States v. Carrington*, CR09-0791 DLJ, Doc. 19, (N.D. Cal., 2009) – submitted on July 21, 2016, U.S. Probation Officer Tiffani Dyke states: "**This is to provide notice that Carrington is set to expire from supervision on September 12, 2016. [...] It is this officer's recommendation that the Court [...] allow supervision to expire as scheduled.**" As of September 13, 2016, Carrington was no longer under supervised parole. (Emphasis added.)

1
2 260. And, by so doing, LA Fitness knowingly and intentionally continues to provide its
3 Convicted-Felon-Con-Artist Club Manager with not only a livelihood so that he can continue
4 representing himself as a Medal of Honor Navy SEAL Recipient (which, in fact, he is not and
5 never has been), Oxford-educated Doctor of Philosophy in Theology (which, in fact, he is not and
6 never has been), and an all-around good guy (which, in fact, he is not and never, ever has been),
7 but LA Fitness also knowingly and intentionally continues to provide its Convicted-Felon-Con-
8 Artist Club Manager the perfect opportunity to continue to identify, stalk and con its members.

9 261. Shortly thereafter, LA Fitness rewards its Convicted-Felon-Con-Artist Club
10 Manager by reassigning him from LA Fitness' Van Nuys facility to LA Fitness' West LA/Bundy
11 facility.

12 1914 SOUTH BUNDY DRIVE
13 LOS ANGELES, CA 90025
14 (310) 820-7571

ONLINE MEMBERSHIP		Join Now
\$99.00	\$39.99	
initiation fee	per month	
Premier Plus Online - Easy Start		

15 **Club Managers**

- 16 • Member Service
17 **Jordan K.**
- 18 • Fitness Sales
19 **Jose D.**
- Personal Training
Antonio W.

20 *Online Source:* <https://www.lafitness.com/Pages/clubhome.aspx?clubid=821>.

21 262. LA Fitness member Jenifer Lewis, on the other hand, suffered. She was destroyed
22 emotionally and damaged financially. During her sworn testimony, she elaborated on how the
23 actions (an inactions) of not only LA Fitness Club Manager Antonio W, but also LA Fitness itself,
24 affected her.

- 25 • "On the day that my mother died, I found out he's on supervised release,
26 parole."
- 27 • "It was like my soul was shattered."
- 28 • "But he's so masterful. He's been doing this since 1986."

- “He researched me on the Internet, knew all the intricate things about me, intricate things, and used them to con me into dating him. **I am afraid for my life. He is all muscle. He could hurt me.**”
- “He kind of brainwashed me, and **I’m back in therapy now because of this.**”
- “He’s a masterful con artist. He has no feelings whatsoever because he’s a sociopath. And he just got out of prison and told me he was at Oxford when in fact he was in prison.”
- “– he threatened me because he wanted more money.”
- “I continue to be afraid of my life. In the past Wilson has been charged with possession of weapons. **He knows everything about me – my family, my friends, my home and where I work.**” (Emphasis added.)

263. During her sworn testimony before the Court, Jenifer Lewis articulated that her motivation in pursuing an action against LA Fitness is to remove LA Fitness Manager Antonio W from his managerial position at LA Fitness where he is in “a position to prey on many women.”

He has placed himself at L.A. Fitness in a position to prey on so many women, and once I get the restraining order, my lawyer is going to sue, try to sue, L.A. Fitness for hiring him [...]. (Emphasis added.)

264. Prior to and throughout LA Fitness Club Manager Antonio W’s employment, LA Fitness knowingly and intentionally has provided and provides its Convicted-Felon-Con-Artist Club Manager with the perfect opportunity to con its members, with former LA Fitness member Jenifer Lewis being just one such victim.

265. After LA Fitness refuses to terminate the employment of its Convicted-Felon-Con-Artist Club Manager Antonio W, the life of LA Fitness member Jenifer Lewis is nearly destroyed. The blow of being victimized by LA Fitness Club Manager Antonio W, coupled with the realization that all the evidence points to LA Fitness being a co-conspirator, is horrible; but what is even more devastating is her inability to prevent other LA Fitness members from becoming victims, as she is a woman who transcended poverty to build a life of success and commitment to helping others.

1 266. In order to cope with the emotional devastation caused by LA Fitness Club
2 Manager Antonio W and LA Fitness, LA Fitness member Jenifer Lewis is forced to return to
3 therapy, having completed it several years earlier. Furthermore, the trauma all but erased the joy
4 that should have accompanied the achievement of her life-long goal of earning a role as a "regular"
5 on network television. The worst part is that the abuse and emotional harm perpetrated against
6 her by both LA Fitness and LA Fitness Club Manager Antonio W robbed LA Fitness member
7 Jenifer Lewis of the time and attention required to fully mourn the death of her mother.

8
9 267. After enduring the trauma for more than a year, Jenifer Lewis is now emotionally
10 ready to do what she testified under oath she would do: "sue [...] LA Fitness for hiring" its
11 Convicted-Felon-Con-Artist Club Manager.

12 FIRST CAUSE OF ACTION

13 Fraud

14 [As Against Defendant ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON,
15 a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a
16 ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON]

17 268. The allegations set forth in Paragraphs 1 through 267 are re-alleged and
18 incorporated herein by reference.

19 269. Defendant ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a
20 DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO
21 MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON represented to Plaintiff JENIFER
22 LEWIS that important facts were true.

23 270. Defendant ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a
24 DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO
25 MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON's representations were false.

26 271. Defendant ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a
27 DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO
28 MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON knew that the representation was
false when he made them, or that he made these representations recklessly and without regard for
their truth.

1
2 272. Defendant ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a
3 DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO
4 MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON intended that Plaintiff JENIFER
5 LEWIS rely on the representations.

6 273. Plaintiff JENIFER LEWIS reasonably relied on Defendant ANTONIO
7 MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a DR. ANTONIO M. WILSON, a/k/a
8 TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO MARIOT WILSON, a/k/a
9 ANTONIO MARIOTT WILSON's representation.

10 274. Plaintiff JENIFER LEWIS was harmed.

11 275. Plaintiff JENIFER LEWIS' reliance on Defendant ANTONIO MARRIOTT
12 WILSON, a/k/a BRICE CARRINGTON, a/k/a DR. ANTONIO M. WILSON, a/k/a TONY
13 WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO MARIOT WILSON, a/k/a ANTONIO
14 MARIOTT WILSON's representations were a substantial factor in causing her harm.

15 **SECOND CAUSE OF ACTION**

16 **Concealment**

17 **[As Against Defendant FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS]**

18 276. The allegations set forth in Paragraphs 1 through 275 are re-alleged and
19 incorporated herein by reference.

20 277. Defendant FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS and Plaintiff
21 JENIFER LEWIS were in a fiduciary relationship.

22 278. Defendant FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS intentionally
23 failed to disclose an important fact to Plaintiff JENIFER LEWIS.

24 279. Defendant FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS actively
25 concealed an important fact from Plaintiff JENIFER LEWIS or prevented her from discovering
26 that fact.

27 280. Plaintiff JENIFER LEWIS did not know of the concealed fact.
28

1 M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO MARIOT
2 WILSON, a/k/a ANTONIO MARIOTT WILSON was a substantial factor in causing harm to
3 Plaintiff JENIFER LEWIS.
4

5 **FOURTH CAUSE OF ACTION**

6 **Negligent Supervision**

7 **[As Against Defendant FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS]**

8 290. The allegations set forth in Paragraphs 1 through 289 are re-alleged and
9 incorporated herein by reference.

10 291. Defendant ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a
11 DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO
12 MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON was unfit and/or incompetent to
13 perform the work for which he was hired.

14 292. Defendant FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS knew or should
15 have known that ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a DR.
16 ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO
17 MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON was unfit and/or incompetent and that
18 this unfitness and/or incompetence created a particular risk to others.

19 293. ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a DR.
20 ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO
21 MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON's unfitness and/or incompetence
22 harmed Plaintiff JENIFER LEWIS.

23 294. Defendant FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS' **negligence in**
24 **supervising** ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a DR.
25 ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO
26 MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON was a substantial factor in causing
27 Plaintiff JENIFER LEWIS' harm.
28

1 **FIFTH CAUSE OF ACTION**

2 **Negligent Retention**

3 **[As Against Defendant FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS]**

4 295. The allegations set forth in Paragraphs 1 through 294 are re-alleged and
5 incorporated herein by reference.

6 296. Defendant ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a
7 DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO
8 MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON was unfit and/or incompetent to
9 perform the work for which he was hired.

10 297. Defendant FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS knew or should
11 have known that ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a DR.
12 ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO
13 MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON was unfit and/or incompetent and that
14 this unfitness and/or incompetence created a particular risk to others.

15 298. ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a DR.
16 ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO
17 MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON's unfitness and/or incompetence
18 harmed Plaintiff JENIFER LEWIS.

19 299. Defendant FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS' **negligence in**
20 **retaining** ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a DR.
21 ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO
22 MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON was a substantial factor in causing
23 Plaintiff JENIFER LEWIS' harm.

24 ///

25 ///

26 ///

27 ///

28 ///

1 **SIXTH CAUSE OF ACTION**

2 **Negligent Misrepresentation**

3 **[As Against Defendants ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON,**
4 **a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a**
5 **ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON, and**
6 **FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS]**

7 300. The allegations set forth in Paragraphs 1 through 299 are re-alleged and
8 incorporated herein by reference.

9 301. Defendants ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON,
10 a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a
11 ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON, and FITNESS
12 INTERNATIONAL, LLC, a/k/a LA FITNESS represented to Plaintiff JENIFER LEWIS that
13 important facts were true.

14 302. Defendants ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON,
15 a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a
16 ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON, and FITNESS
17 INTERNATIONAL, LLC, a/k/a LA FITNESS FITNESS' representations were not true.

18 303. Although Defendant FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS may
19 have honestly believed that the representations were true, FITNESS INTERNATIONAL, LLC,
20 a/k/a LA FITNESS had no reasonable grounds for believing the representations were true when it
21 made them.

22 304. Defendant ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a
23 DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO
24 MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON did not honestly believed that the
25 representations were true and had no reasonable grounds for believing the representations were
26 true when he made them.

27 305. Defendants ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON,
28 a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a
ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON, and FITNESS

1 INTERNATIONAL, LLC, a/k/a LA FITNESS intended that Plaintiff JENIFER LEWIS rely on the
2 representations.

3 306. Plaintiff JENIFER LEWIS reasonably relied on Defendants ANTONIO
4 MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a DR. ANTONIO M. WILSON, a/k/a
5 TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO MARIOT WILSON, a/k/a
6 ANTONIO MARIOTT WILSON, and FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS'
7 representations.

8 307. Plaintiff JENIFER LEWIS was harmed.

9 308. Plaintiff JENIFER LEWIS' reliance on Defendants ANTONIO MARRIOTT
10 WILSON, a/k/a BRICE CARRINGTON, a/k/a DR. ANTONIO M. WILSON, a/k/a TONY
11 WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO MARIOT WILSON, a/k/a ANTONIO
12 MARIOTT WILSON, and FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS'
13 representations were a substantial factor in causing her harm.
14

15 **SEVENTH CAUSE OF ACTION**

16 **Intentional Misrepresentation**

17 **[As Against Defendants ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON,
18 a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a
19 ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON and
20 FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS]**

21 309. The allegations set forth in Paragraphs 1 through 308 are re-alleged and
22 incorporated herein by reference.

23 310. Defendants ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON,
24 a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a
25 ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON, and FITNESS
26 INTERNATIONAL, LLC, a/k/a LA FITNESS represented to Plaintiff JENIFER LEWIS that
27 important facts were true.
28

311. Defendants ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON,
a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a

1 ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON, and FITNESS
2 INTERNATIONAL, LLC, a/k/a LA FITNESS' representations were false.

3
4 312. Defendants ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON,
5 a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a
6 ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON, and FITNESS
7 INTERNATIONAL, LLC, a/k/a LA FITNESS knew that the representations were false when it
8 made them, or that it made the representations recklessly and without regard for the truth.

9 313. Defendants ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON,
10 a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a
11 ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON, and FITNESS
12 INTERNATIONAL, LLC, a/k/a LA FITNESS intended that Plaintiff JENIFER LEWIS rely on the
13 representations.

14 314. Plaintiff JENIFER LEWIS reasonably relied on Defendants ANTONIO
15 MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a DR. ANTONIO M. WILSON, a/k/a
16 TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO MARIOT WILSON, a/k/a
17 ANTONIO MARIOTT WILSON, and FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS'
18 representations.

19 315. Plaintiff JENIFER LEWIS was harmed.

20 316. Plaintiff JENIFER LEWIS' reliance on Defendants ANTONIO MARRIOTT
21 WILSON, a/k/a BRICE CARRINGTON, a/k/a DR. ANTONIO M. WILSON, a/k/a TONY
22 WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO MARIOT WILSON, a/k/a ANTONIO
23 MARIOTT WILSON, and FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS'
24 representations were a substantial factor in causing her harm.

25 ///

26 ///

27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EIGHTH CAUSE OF ACTION

Negligent Infliction of Emotional Distress

[As Against Defendants ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON and FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS]

317. The allegations set forth in Paragraphs 1 through 316 are re-alleged and incorporated herein by reference.

318. Defendants ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON, and FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS were negligent.

319. Plaintiff JENIFER LEWIS suffered serious emotional distress.

320. Defendants ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON, and FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS' negligence was a substantial factor in causing Plaintiff JENIFER LEWIS' serious emotional distress.

NINTH CAUSE OF ACTION

Intentional Infliction of Emotional Distress

[As Against Defendants ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON and FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS]

321. The allegations set forth in Paragraphs 1 through 320 are re-alleged and incorporated herein by reference.

322. Defendants ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON, and FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS' conduct was outrageous.

01/06/2017

1 323. Defendants ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON,
2 a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a
3 ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON, and FITNESS
4 INTERNATIONAL, LLC, a/k/a LA FITNESS intended to cause Plaintiff JENIFER LEWIS'
5 emotional distress.

6 324. Plaintiff JENIFER LEWIS suffered severe emotional distress.

7 325. Defendants ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON,
8 a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a
9 ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON, and FITNESS
10 INTERNATIONAL, LLC, a/k/a LA FITNESS' conduct was a substantial factor in causing
11 Plaintiff JENIFER LEWIS' severe emotional distress.

12
13 **TENTH CAUSE OF ACTION**

14 **Conspiracy**

15 **[As Against Defendants ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON,**
16 **a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a**
17 **ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON and**
18 **FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS]**

19 326. The allegations set forth in Paragraphs 1 through 325 are re-alleged and
20 incorporated herein by reference.

21 327. Prior to and throughout Defendant ANTONIO MARRIOTT WILSON, a/k/a
22 BRICE CARRINGTON, a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY
23 WILLSON, a/k/a ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON's
24 employment with FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS, Defendants
25 ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a DR. ANTONIO M.
26 WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO MARIOT WILSON,
27 a/k/a ANTONIO MARIOTT WILSON and FITNESS INTERNATIONAL, LLC, a/k/a LA
28 FITNESS, and each of them, knowingly and willfully conspired and agreed among themselves to
harm LA Fitness member Jenifer Lewis, and, by so doing, caused injury to her.

1 328. The civil wrongs committed that caused injury to LA Fitness member Jenifer Lewis
2 include, but are not limited to, Defendants ANTONIO MARRIOTT WILSON, a/k/a BRICE
3 CARRINGTON, a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY
4 WILLSON, a/k/a ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON and
5 FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS, along with LA Fitness Facility Director
6 Tim Caballero, and each of them, presenting the following email to the Los Angeles Superior
7 Court:

8 Jenifer Lewis - Tony Wilson FITDIR/VAN NUYS - SEPULVEDA BLVD.

Page 1 of 1

9 Jenifer Lewis

10 Tim Caballero OFCMGR/VAN NUYS - SEPULVEDA BLVD.

11 Mon 9/28/2015 5:04 PM

12 To: Tony Wilson FITDIR/VAN NUYS - SEPULVEDA BLVD. <tony.wilson@fitnessintl.com>;

13 Tony,

14 I'm writing this to inform you of the conversation I had with Jenifer Lewis - she contacted making
15 accusations that you were a fraud and a con artist. I informed Ms. Lewis that she needs to stop making
16 these accusations to your manager without any proof. Ms Lewis continued to make comments. I
17 advised her I can no longer speak to her and that she should not go to this location anymore.

18 Let me know if there is anything else you need.

19 Tim Caballero

20 [...]

21 <https://owa.lafitness.com/OWA/>

9/28/2015

22 329. Defendants ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON,
23 a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a
24 ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON and FITNESS
25 INTERNATIONAL, LLC, a/k/a LA FITNESS, and each of them, did the acts and things herein
26 alleged pursuant to, and in furtherance of, the conspiracy and above-alleged agreement.

27 330. Defendant ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON, a/k/a
28 DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO
MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON, furthered the conspiracy by

1 cooperation with FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS, who lent aid and
2 encouragement to, and who ratified and adopted the acts of Defendant ANTONIO MARRIOTT
3 WILSON, a/k/a BRICE CARRINGTON, a/k/a DR. ANTONIO M. WILSON, a/k/a TONY
4 WILSON, a/k/a TONY WILLSON, a/k/a ANTONIO MARIOT WILSON, a/k/a ANTONIO
5 MARIOTT WILSON.

6
7 331. As a proximate result of the wrongful acts herein alleged, Plaintiff JENIFER
8 LEWIS has been generally damaged an amount according to proof.

9 332. Defendants ANTONIO MARRIOTT WILSON, a/k/a BRICE CARRINGTON,
10 a/k/a DR. ANTONIO M. WILSON, a/k/a TONY WILSON, a/k/a TONY WILLSON, a/k/a
11 ANTONIO MARIOT WILSON, a/k/a ANTONIO MARIOTT WILSON and FITNESS
12 INTERNATIONAL, LLC, a/k/a LA FITNESS, and each of them, together, did the things herein
13 alleged maliciously and to oppress Plaintiff Jenifer Lewis. Plaintiff Jenifer Lewis is therefore
14 entitled to exemplary or punitive damages in an amount to be determined based upon the wealth of
15 the Defendant FITNESS INTERNATIONAL, LLC, a/k/a LA FITNESS.

16 **REQUEST FOR JURY TRIAL**

17 Plaintiff JENIFER LEWIS requests a trial by jury.

18 **PRAYER FOR RELIEF**

19 **WHEREFORE**, Plaintiff JENIFER LEWIS requests the following:

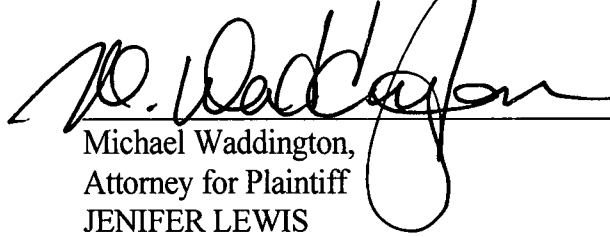
- 20 1. For general damages to compensate Plaintiff for the humiliation, emotional distress,
21 anger, loss of enjoyment of life, embarrassment, anxiety, and mental and physical
22 pain and anguish, as well as other intangible losses, she has and will suffer;
- 23 2. Medical treatment costs, psychological treatment costs, and other treatment costs
24 previously incurred by Plaintiff;
- 25 3. General damages for pain, suffering, and other intangible losses sustained by
26 Plaintiff;
- 27 4. Punitive damages;
- 28 5. Attorney's fees and costs of suit herein;

- 1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
6. Pre-judgment and post-judgment interest allowed by law; and,
 7. Such other and further relief as the Court may deem proper.

DATED: January 5, 2017

Respectfully submitted,

LAW OFFICE OF MICHAEL WADDINGTON, APC


Michael Waddington,
Attorney for Plaintiff
JENIFER LEWIS

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

Michael Waddington, Esq. (SBN 172279)

LAW OFFICE OF MICHAEL WADDINGTON, APC

9615 Brighton Way, Suite 400

Beverly Hills, CA 90210

TELEPHONE NO.: 310-276-4100

FAX NO.: 310-276-4106

ATTORNEY FOR (Name): Jenifer Lewis

FOR COURT USE ONLY

FILED
Superior Court Of California
County Of Los Angeles

JAN 06 2017

Sherri R. Carter, Executive Officer/Clerk

By Charlie L. Coleman, Deputy
Charlie L. Coleman

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles

STREET ADDRESS: 111 N. Hill Street

MAILING ADDRESS:

CITY AND ZIP CODE: Los Angeles, CA

BRANCH NAME: Stanely Mosk Courthouse, Central District

CASE NAME:

Lewis vs. Wilson, et al.

CIVIL CASE COVER SHEET

☒ **Unlimited** (Amount demanded exceeds \$25,000) ☐ **Limited** (Amount demanded is \$25,000 or less)

Complex Case Designation

☐ Counter ☐ JoinderFiled with first appearance by defendant
(Cal. Rules of Court, rule 3.402)CASE NUMBER: **BC 6 45 841**

JUDGE:

DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort

☐ Auto (22)
☐ Uninsured motorist (46)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

☐ Asbestos (04)
☐ Product liability (24)
☐ Medical malpractice (45)
☐ Other PI/PD/WD (23)

Non-PI/PD/WD (Other) Tort

☐ Business tort/unfair business practice (07)
☐ Civil rights (08)
☐ Defamation (13)
☒ Fraud (16)
☐ Intellectual property (19)
☐ Professional negligence (25)
☐ Other non-PI/PD/WD tort (35)

Employment

☐ Wrongful termination (36)
☐ Other employment (15)

Contract

☐ Breach of contract/warranty (06)
☐ Rule 3.740 collections (09)
☐ Other collections (09)
☐ Insurance coverage (18)
☐ Other contract (37)

Real Property

☐ Eminent domain/Inverse condemnation (14)
☐ Wrongful eviction (33)
☐ Other real property (26)

Unlawful Detainer

☐ Commercial (31)
☐ Residential (32)
☐ Drugs (38)

Judicial Review

☐ Asset forfeiture (05)
☐ Petition re: arbitration award (11)
☐ Writ of mandate (02)
☐ Other judicial review (39)

Provisionally Complex Civil Litigation
(Cal. Rules of Court, rules 3.400-3.403)

☐ Antitrust/Trade regulation (03)
☐ Construction defect (10)
☐ Mass tort (40)
☐ Securities litigation (28)
☐ Environmental/Toxic tort (30)
☐ Insurance coverage claims arising from the above listed provisionally complex case types (41)

Enforcement of Judgment

☐ Enforcement of judgment (20)

Miscellaneous Civil Complaint

☐ RICO (27)
☐ Other complaint (not specified above) (42)

Miscellaneous Civil Petition

☐ Partnership and corporate governance (21)
☐ Other petition (not specified above) (43)

2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

- a. ☐ Large number of separately represented parties d. ☐ Large number of witnesses
b. ☐ Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e. ☐ Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
c. ☐ Substantial amount of documentary evidence f. ☐ Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a. ☒ monetary b. ☐ nonmonetary; declaratory or injunctive relief c. ☒ punitive

4. Number of causes of action (specify): 10

5. This case ☐ is ☒ is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: January 5, 2017

Michael Waddington

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

SHORT TITLE: Lewis v. Wilson, et al.

CASE NUMBER

BC 6 4 5 8 4 1

**CIVIL CASE COVER SHEET ADDENDUM AND
STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to Local Rule 2.3 in all new civil case filings in the Los Angeles Superior Court.

Step 1: After completing the Civil Case Cover Sheet (Judicial Council form CM-010), find the exact case type in Column A that corresponds to the case type indicated in the Civil Case Cover Sheet.

Step 2: In Column B, check the box for the type of action that best describes the nature of the case.

Step 3: In Column C, circle the number which explains the reason for the court filing location you have chosen.

Applicable Reasons for Choosing Court Filing Location (Column C)

1. Class actions must be filed in the Stanley Mosk Courthouse, Central District.
2. Permissive filing in central district.
3. Location where cause of action arose.
4. Mandatory personal injury filing in North District.
5. Location where performance required or defendant resides.
6. Location of property or permanently garaged vehicle.
7. Location where petitioner resides.
8. Location wherein defendant/respondent functions wholly.
9. Location where one or more of the parties reside.
10. Location of Labor Commissioner Office.
11. Mandatory filing location (Hub Cases – unlawful detainer, limited non-collection, limited collection, or personal injury).

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
	Auto Tort		
Other Personal Injury/Property Damage/Wrongful Death Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1, 4, 11
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1, 4, 11
	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage	1, 11
		<input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	1, 11
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1, 4, 11
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons	1, 4, 11
		<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1, 4, 11
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall) <input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1, 4, 11 1, 4, 11 1, 4, 11 1, 4, 11

SHORT TITLE:

Lewis v. Wilson, et al.

CASE NUMBER

Non-Personal Injury/Property
Damage/ Wrongful Death Tort

Employment

Contract

Unlawful Detainer
Real Property

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1, 2, 3
Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1, 2, 3
Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1, 2, 3
Fraud (16)	<input checked="" type="checkbox"/> A6013 Fraud (no contract)	1, 2, 3
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1, 2, 3 1, 2, 3
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	1, 2, 3
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1, 2, 3
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1, 2, 3 10
Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2, 5 2, 5 1, 2, 5 1, 2, 5
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case <input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)	5, 6, 11 5, 11 5, 6, 11
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1, 2, 5, 8
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1, 2, 3, 5 1, 2, 3, 5 1, 2, 3, 8, 9
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels_____	2, 6
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2, 6
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2, 6 2, 6 2, 6
Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	6, 11
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	6, 11
Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2, 6, 11
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2, 6, 11

SHORT TITLE:

Lewis v. Wilson, et al.

CASE NUMBER

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Judicial Review	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2, 3, 6
	Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2, 5
	Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2, 8 2 2
	Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2, 8
Provisionally Complex Litigation	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1, 2, 8
	Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1, 2, 3
	Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1, 2, 8
	Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1, 2, 8
	Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1, 2, 3, 8
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1, 2, 5, 8
Enforcement of Judgment	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2, 5, 11 2, 6 2, 9 2, 8 2, 8 2, 8, 9
	RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1, 2, 8
	Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1, 2, 8 2, 8 1, 2, 8 1, 2, 8
	Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2, 8
	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name/Change of Gender <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2, 3, 9 2, 3, 9 2, 3, 9 2 2, 7 2, 3, 8 2, 9

SHORT TITLE:

Lewis v. Wilson, et al.

CASE NUMBER

Step 4: Statement of Reason and Address: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

REASON: <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input type="checkbox"/> 11.			ADDRESS: 6161 Sepulveda Blvd.		
CITY: Van Nuys	STATE: CA	ZIP CODE: 91411			

Step 5: Certification of Assignment: I certify that this case is properly filed in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., §392 et seq., and Local Rule 2.3(a)(1)(E)].

Dated: 01/05/17


(SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 02/16).
5. Payment in full of the filing fee, unless there is court order for waiver, partial or scheduled payments.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

01/06/2017