

EXHIBIT A

State Complaint

**FILED**

OCT 17 2018

4TH DISTRICT  
STATE OF UTAH  
MILLARD COUNTY

Neldon P. Johnson  
2730 West 4000 South  
Oasis, Utah 84624  
(801) 372-4838  
Pro Se Plaintiff

---

**IN THE FOURTH DISTRICT COURT  
FOR MILLARD COUNTY, UTAH**

---

NELDON PAUL JOHNSON,

**COMPLAINT**

Plaintiff,

vs.

Jury Demanded

THOMAS R. MANCINI, an individual,

180700041

Defendant.

---

Plaintiff, Neldon P. Johnson, Pro Se Plaintiff, complains of Defendant as follows:

**JURISDICTION AND VENUE**

1. Plaintiff, Neldon P. Johnson (APlaintiff@), is an individual residing in Millard County who has suffered injury as a result of the Defendant's acting to defame, defraud and injure him.

2. Defendant, Thomas R. Mancini (AMancini@), is an individual who acted came to Utah with the intent to injure Plaintiff and succeeded in causing Plaintiff injury by his publication of false and fraudulent statements.

3. This Court has jurisdiction in this matter because the events complained of and the injuries suffered happened in the State of Utah. Venue is proper with this Court in that the cause of action arose in Utah and the Defendant has caused injury to Plaintiff in Millard County, Utah.

GENERAL ALLEGATIONS

4. Plaintiff incorporates by reference the allegations contained in the prior paragraphs 1 through 3 as though set forth herein.

5. Plaintiff was sued by the DOJ on behalf of the IRS for alleged tax violations involving the sale of patented Fresnel lenses to the public.

6. The patented Fresnel lenses took years of research and development, costing millions of dollars of investment, to solve numerous design and manufacturing challenges.

7. The Plaintiff, prior to selling any of the patented Fresnel lens, engaged legal counsel in both Millard County and Salt Lake City to obtain advice on how to properly sell the lenses to the public.

8. The patented lenses concentrate solar heat and achieves temperatures in excess of 1,500° Fahrenheit.

9. Plaintiff was advised by multiple law firms and certified public accounting firms, and acted in reliance upon that advice and counsel.

10. The Fresnel lenses were sold to the public using sales documents prepared by attorneys which were designed to allow purchasers to potentially qualify for tax benefits.

11. Defendant Mancini has testified under oath that the Plaintiff's lenses produced heat in excess of 754°, but then fraudulently claimed that the Plaintiff's Fresnel lenses could not ever be used to produce electricity.

12. Defendant Mancini has published and republished these false statements from the time he was hired to attack Plaintiff as a consultant by the IRS, and continues to make false and fraudulent statements against Plaintiff through the present, including disseminating these false statements to the Deseret News and other news media with the intent to have their publication of the false statements known widely.

13. Because it is a scientific fact that any form of heat can be used to produce electricity, therefore the Defendant knew or should have known that his statements concerning the Fresnel lenses purported inability to ever be used to produce electricity were false.

14. Defendant knowing that the statements about Plaintiff's Fresnel lenses were false, used, repeated, published, and widely disseminated the false and fraudulent claim that the Plaintiff's Fresnel lenses could not ever be used to produce electricity.

15. Defendant knew or should have known that the claim that Plaintiff's Fresnel lenses could not ever be used to produce electricity was false, and knew that by repeating the falsehood it would injure Plaintiff, and Defendant Mancini intended to injure Plaintiff by repeating this false and unsupportable false statement.

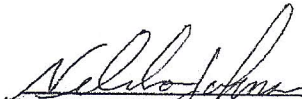
16. Defendant Mancini was motivated, in part, to make the false and defamatory statements against Plaintiff because he was being compensated by the IRS to offer his false statements to support litigation against Plaintiff.

17. Defendant Mancini succeeded in deliberately damaging Plaintiff using these false and fraudulent claims to injure Plaintiff.

WHEREFORE, Plaintiff asks this Court to grant relief to Plaintiff as follows:

1. For a Jury trial to determine the Defendant acted fraudulently to Plaintiff's injury.
2. For an award of damages by the Jury for the injury and damages to Plaintiff.
3. For court costs and expenses in bringing this claim to Court.
4. For such other relief as the Jury finds appropriate in this matter.

Dated this 17 day of October, 2018

  
\_\_\_\_\_  
Neldon Johnson, Pro Se