

IN THE LANDGERICHT HAMBURG

DR. RICHARD E. WEBB	}	
Citizen of the United States of America	}	
currently residing in Germany,	}	
at Raiffeisenstraße 1	}	
86868 Mittelneufnach (Bayern)	}	CIVIL ACTION
Plaintiff	}	
	}	
versus	}	Case No. _____
	}	
GREENPEACE e.V.	}	
Brigitte Behrens, Geschäftsführerin	}	
(Chief Executive Director)	}	
Große Elbstr. 39	}	
22745 Hamburg	}	
Defendant	}	

MOTION

I, Richard E. Webb, the above-named complaintiff, brings suit against Greenpeace e.V., the named defendant, and makes several requests as are given and asserted in Section 55 of this Complaint, on pages 93-95. It is not possible for him to write and speak in the German Language. Also, he requests the Court to dispense with any fees for filing this Complaint, as he has no money to pay any such fees.

With this Motion, he gives two copies of the Complaint with two Exhibits.

9 March 2001

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Richard E. Webb  
Raiffeisen Straße 1  
86868 Mittelneufnach  
Bayern (Bavaria)  
Deutschland (Germany)



- C0 The German Government's wrongful Defamations of Plaintiff ..... 35-38 (pp.35-51)
- C. German Government's wrongful Defamations of Plaintiff (continued)..... 35-38 (pp.35-51)
  - 1 The Proceedings and Decision Report of the Verwaltungsgericht-Düsseldorf in the SNR-300 Fast Breeder Reactor Litigation, with the Kernforschungszentrum Karlsruhe (KfK), Gesellschaft für Reaktorsicherheit (GRS), TÜV, and two Ministries of the Nordrhein-Westfalen Government, on behalf of the German federal Government – all combining to defame this Plaintiff, Richard Webb. .... 36 (pp.35-36)
  - 2 The SNR-300 Risk Analysis Study of the GRS and their Partner, the Forschungsgruppe Schneller Brüter e.V. .... 37-38 (pp.36-51)
- D0 Greenpeace e.V.'s Response to the Chernobyl Nuclear Accident – The Greenpeace *International Reactor Hazard Study* ..... 39-41 (pp.51-67)
- E0 More wrongful Defamations of Plaintiff by the German Government..... 42 (pp.68-78)
  - 1 The Publication by a Coalition comprised of the Schleswig-Holstein Energy Ministry, the Federal Minister for Environment and Reactor Safety (Klaus Töpfer), the Fachverband Strahlenschutz e.V., and TÜV-Rheinland e.V., of a contrived "Critical Evaluation" of a *Statistical Analysis* made by the Plaintiff, Richard Webb, for investigating the Cancer Mortality Effects of Nuclear Radiation ..... 42 (pp.68-76)
  - 2 The Publication by the GSF–Forschungszentrum für Umwelt und Gesundheit, *Reaktorkatastrophe und Säuglingssterblichkeit?*, misrepresenting, and wrongfully discrediting, the Plaintiff's Statistical Analysis that evaluates the Effects on Human Births of the Radioactive Fallout in Bavaria from the Chernobyl Reactor Eruption..... 43 (p.76)
  - 3 The Bavarian Environment Ministry's public Display of libelous Letters and Memoranda defaming Plaintiff ..... 44 (pp.76-77)
- F0 The Öko-Institut e.V., and their Suppression of Richard Webb's Scientific Findings of the Nuclear Accident Hazards; and Greenpeace's Associations with the Öko-Institut e.V. .... 46 (pp. 78-84)
- G0 The foregoing Circumstances explain and aggravate Greenpeace's *malicious* Defamation of Plaintiff..... 45 and 47-49 (pp.77-78, 84-91)

1	Greenpeace's <i>Atom Ausstieg</i> Theme without Substance – Lack of "Information Materials" on the Matter of the Accident Hazards of Nuclear Power Plants, and the Greenpeace e.V. "Campaign" Activity of <i>criminal trespass</i> – a Fraud played on the Public .....	48 (pp.85-90)
2	All the Foregoing being <i>circumstantial evidence</i> of the <i>maliciousness</i> of Greenpeace's defamatory report about the Plaintiff, further warranting <i>forfeitures</i> for the criminal Offences committed.....	49 (pp.90-91)
VIII	The Power of Greenpeace e.V. to defame the Plaintiff in his home Country, the United States of America – <i>forfeiture</i> as a Security .....	50 (pp.91-92)
IX	<i>Forfeitures</i> warranted, to go to the Plaintiff, for him to apply for the Public Good – his scientific Research, Writings, and Publications in respect to the Nuclear Accident Hazards. ....	51 (p.92)
X	The Plaintiff's Demands from Greenpeace e.V. – Recovery in <i>damages</i> , or pecuniary Compensation, plus Penalty in <i>forfeitures</i> , totalling – \$13 million .....	52-54 (pp.92-93)
XI	Points of Law .....	55 (p.93)
A0	Section 824 of the Bürgerliches Gesetzbuch (German Civil Code) on Defamation, or <i>Verleumdung</i> – an invalid Statute .....	55a (p.93)
B0	The Power and Duty of the Court as a <i>court of justice</i> .....	55b (pp.93-94)
C0	The ZPO – the Civil Rules of Procedure – § 78 Requirement in respect to an <i>attorney</i> – an invalid Statute .....	55c (p.94)
D0	The GVG, § 184 Requirement that the Court Language is <i>German</i> – an <u>inequitable</u> Rule for this Case; Plaintiff's Motion to appoint a special Judge and Jury. ....	55d (pp.94-95)
E0	Legal Aid requested.....	55e (p.95)
F0	The Right asserted for a Hearing on the Points of Law .....	55f (p.95)
XII	The Plaintiff's literary, legal, and political Activities in respect to the United States <i>constitutional law</i> , and Greenpeace e.V.'s <i>ties</i> with the German Government – a further Circumstance toward explaining and aggravating Greenpeace's malicious Defamation of the Plaintiff .....	56 (pp.96-99)
	Exhibit No. 1 – the GREENPEACE Magazin Article, plus the Plaintiff's Translation	
	Exhibit No. 2 – Richard Webb's Background, and List of Writings and Publications	

[Omission of the all but this last section of the Complaint. The full complaint is on the CD.]

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1. The Plaintiff alleges other *circumstances* of Greenpeace's malicious defamation of him which, because of the Greenpeace's *tax privilege* tie with the German Government, and the policies of Greenpeace e.V. with respect to what Greenpeace has called, *security politics*, or *Sicherheitspolitik*, can partly explain a motive for their libel against Webb, and which *circumstances* also go to aggravate the damage done to the Plaintiff by Greenpeace's malicious defamation of him. Those circumstances are related to Webb's literary, legal, and political activities in connection with his studies of United States *constitutional law*, and more specifically, his essays and treatises, and legal court briefs, which assert and prove, he claims, that the United States Government – by which he means, the "national" government that has developed in the United States - has violated the United States Constitution (a) in assuming and exercising powers to assist foreign nations in their wars and quarrels, and generally to assume the power of a world police force, as in World War I and World War II, ending in nuclear war, Korea, Vietnam, Iraq, and Yugoslavia, for the main instances, hence also the cause of the making, testing, and deployments of nuclear weapons (and their use in 1945); (b) in forming and contracting alliances with foreign nations, as the North Atlantic Treaty Organization, or the NATO alliance, and the Security Council of the United Nations (Webb asserts that the United States Government is not vested by the U.S Constitution with the power to enter into *alliances* with foreign nations.); (c) in providing "foreign assistance," such as military weapons, and covert operations, and "foreign aid" for the purpose of industrializing other lands; (d) in developing and licensing nuclear power plants, in promoting air travel, building super highways everywhere and ringing the Earth with *satellites*, for military purposes (as a nuclear war), beamin gmicrowaves down on the Earth, for instance, and (e) giving one person, the President of the United States, the power to produce and use nuclear weapons "as he deems necessary in the interest of national defense " – one line of the Atomic Energy Act giving one man the power to bring on nuclear war and the annihilation of the Earth.

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Webb notes his findings of United States constitutional law, that the powers vested in the United States Government by the Constitution of the United States are expressly limited for the purpose "to provide for the common Defence and general Welfare of the United States" (Article I, Section 8, and the Preamble), and not, therefore, to provide for the defence and security of other nations, such as for alliance partners, and also not for any object of the "national security," which has been the handle for making wars. The People of the United States who ordained and established the Constitution of the United States knew full well the difference between the object, "to provide for the future security" of one's nation, and the different object of providing for *defence*. Defence is fending off an attack; security is to make wars in foreign lands for the object of providing for a nation's future security, as "international peace and security" – the declared objects of the NATO treaty and the United Nations treaty with its Security Council provisions for making war alliances, as against Iraq in 1991.

The Plaintiff asserts that nuclear power plants have been developed in the United States, by unconstitutional aids, licenses, and regulations, primarily to supply much of the electrical power needed to run the enormous industry and vast array of business which directly or indirectly produce and support the weapons systems and the enormous U.S. military establishment that is deployed all around the globe, with both its nuclear and non-nuclear weapons, as cruise missiles bombs, and that it is that industry, including the auto and oil industry needed so that all the industry workers and military personnel can travel to and from work every day, and to truck around all of the materials and products, that causes the "global environmental problems" of *pollution*, of global warming and horrible climatic effects, as huge tornados now in the United States, and more intense UV radiation from the sun, &c.

The United States Government surely knows of Webb's literary, legal, and political activities in opposition to the United States Government's unconstitutional activities. For instance, in early January 1991 he distributed before the U.S. attacks on Iraq about thirty copies of his treatise *Analysis of the Constitution with respect to the Authority to make War and Alliances, and the Employment of Force against Iraq* to the then President of the United States, George Bush, and other high officers, including the President legal advisor on the National Security Council. Also, his law suit against the United States Atomic

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Also, Webb asserts his finding that the power vested in the President of the United States, but by and with the "advice and consent of the Senate," two thirds present concurring, *to make treaties* (Article II, Section 2) is no authority *to contract alliances* with foreign nations; as is indicated in Article I, Section 10 of the Constitution, which distinguishes between a *treaty*, an *alliance*, and a *confederation*: "No State shall enter into any Treaty, Alliance, or Confederation; ..." Thus, signifying that a *treaty* is one thing, an *alliance* is another; and indeed, the classic treatises on *the law of nations*, as by Grotius, and by Pufendorf, defined a *treaty* as a contract whereby the parties remain separated: I will do this, and you will do that. An *alliance* is a contract whereby the parties *unite* to form a single body, as a joint offensive to make war.

The consequences of the usurpations of power by the officers of the United States, principally by the Presidents of the United States, and the members of the Congress of the United States, have been nothing but wars throughout the Twentieth Century, and destruction and loss of life and limb, and now, recently with more attacks in Iraq to begin the Twenty-first. Webb finds that the Constitution of the United States requires that the United States remain neutral in relation to foreign quarrels. The only *alliance* which the People of the United States have authorized is that of the "United States of America" – originally a confederation of thirteen free and independent States, – a Union formed more perfect by the establishment of the Constitution – hence, the words "to provide for the common defence and general Welfare of the United States – the common defence of a number of States formed together in a confederation styled, the United States of America.

Energy Commission in 1972, *Webb v. Atomic Energy Commission*, charging that the Atomic Energy Act is unconstitutional.

The German Government has joined the NATO alliance with the United States Government, and has joined and assisted the United States Government in making war against the nations Iraq and Yugoslavia, and has had evident ties with the United States Government and its agencies in the development of nuclear power plants in Germany, and allows the export of nuclear power reactors to other countries. Ministries, agencies, and consultants of the German Government have wrongfully defamed the Plaintiff, Richard Webb, in a number of instances, as before charged. Greenpeace e.V. is tied to the German Government by their tax privileges, and Greenpeace e.V. also has wrongfully defamed Webb. Greenpeace e.V.'s information materials, before listed, indicate no Greenpeace e.V. opposition to the Iraq and Yugoslavia wars and no opposition to the enormous deployments in the world of non-nuclear weapons and their manufacture.

All of these facts go to make it probable that Webb's activities in relation to United States *constitutional law* – his lawful activities in opposition to the United States Government's unconstitutional laws, treaties, activities, and wars, was a factor of some weight in Greenpeace e.V.'s malicious defamation of the Plaintiff that has so destroyed his reputation. And also, the facts of Webb's studies and activities in the matter of the United States constitutional law are important in assessing the damage done to Webb's career by Greenpeace's

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Also, Greenpeace e.V. managers must have know about Webb's studies and political activities with respect to the United States constitutional law; for, the manager of Greenpeace's *International Reactor Hazard Study*, Dr. Helmut Hirsch, addressed the same conference of the Anti-Atom International in Vienna in September 1986 as Webb also addressed, and Webb there presented two lectures – or speeches – one summarizes his Chernobyl accident analysis and his comparative analysis of the accident hazards of the western type reactors, and another on United States constitutional law – a speech titled, *Democratic and Constitutional [Law] Principles Reviewed and Asserted*. The speech was given as part of Webb's evidence in the British Government's Hinkley Point Public Inquiry, and Greenpeace U.K. was a full participant in that proceeding. Also, some time later, Greenpeace e.V.'s Kerstin Eitner met and conferred with Webb in 1987 (or 1988) in his temporary apartment in Steinebach on Wörthsee in Bavaria to learn about Webb's work. She travelled from Greenpeace's office in Hamburg for the visit. Kerstin Eitner authored the chapter of the Greenpeace book, *Das Greenpeace Buch*, titled, "Der Lange Atem des Marathonläufers – Entwicklung der Atom-Kampagne" and "Greenpeace-Chronik 1971 bis 1996." Webb's critical analysis with respect to the United States Constitution of the United States Government's activities is generally known by those who have known him – the matter is included in all his speeches before the public. Also, his book, *The Accident Hazards of Nuclear Power Plants*, contains his analysis of the United States Constitution in respect to nuclear power plants, which affects most other activities of the United States as well, including "foreign aid."

injurious and malicious defamation of him. Finally, the Plaintiff asserts that it is incongruent that Greenpeace, having the word *peace* in its name, would maliciously defame a person who has actively opposed the United States Government's unconstitutional development of nuclear weapons and war makings.

As asserted before, the legal points of United States constitutional law just mentioned are not presented to this Court for any determination, but only declare the facts of Webb's work; he being entitled to pursue lawfully and peacefully his ideas and activities to seek and obtain his safety and happiness, no matter how those ideas might be resisted in government circles, and he being vested by the laws of nature with the right to enjoy the security of his reputation without interruption.

9 March 2001

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Bayern (Bavaria)  
Deutschland (Germany)