GeckoSystems International Corporation

Current Report to Stockholders



January 29, 2016

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FILED
7/10/2015 1:53:07 PM
Rockdale County Superior Court
e-Filed Record

IN THE SUPERIOR COURT OF ROCKDALE COUNTY
STATE OF GEORGIA

R. MARTIN SPENCER and ELAINE G. SPENCER, Plaintiffs, v. NEIL T. WALLACE, BETTE WALLACE, THE ESTATE OF HAROLD WALLACE, and DANIELLE SIMS, Defendants.	CIVIL ACTION FILE NO. 2015-CV-1800-M

COMPLAINT

Plaintiffs, Martin Spencer and Elaine Spencer ("Plaintiffs"), respectfully file this Complaint against Defendants, Neil Wallace, Bette Wallace, the Estate of Harold Wallace, and Danielle Sims (collectively, "Defendants"), and shows this Court the following.

NATURE OF ACTION

1.

This is an action for participation in a conspiracy to intentionally intimidate and injure Plaintiffs and to manipulate the stock of the business Plaintiffs founded. Defendants have engaged in a multi-year campaign of threats, intimidation, defamation, stalking and abuse of the judicial system, all of which has been directed against Plaintiffs. While Plaintiffs have endured this campaign as long as possible, they now seek remuneration in the form of a money judgment in the hopes of ending Defendants' harassment.

PARTIES

2.

Martin Spencer is, and at all times relevant to this action has been, a citizen of the State of Georgia, residing in Conyers, Rockdale County, Georgia.

Elaine Spencer is, and at all times relevant to this action has been, a citizen of the State of Georgia, residing in Conyers, Rockdale County, Georgia.

4.

Neil Wallace ("Neil Wallace") is, and at all times relevant to this action has been, a citizen of the State of Virginia. Neil Wallace may be served at 105 Laffmoss New, Williamsburg, Virginia 23188.

5.

Upon information and belief, Bette Wallace is, and at all times relevant to this action has been, a citizen of the State of New York or Florida. Further discovery will be necessary in order to determine service information.

6.

The Estate of Harold Wallace was, at all times relevant to this action, is an Estate created under the laws of Florida. Further discovery will be necessary in order to determine service information.

7.

Danielle Sims ("Sims") is, and at all times relevant to this action has been, a citizen of the State of Georgia. Sims may be served at 2622 Bailey Drive, Norcross, Georgia 30071.

JURISDICTION AND VENUE

8.

This Court has jurisdiction over the subject matter of this action.

9.

This Court has personal jurisdiction over all of the parties to this action.

10.

Venue is proper in this Court.

FACTS

11.

Plaintiffs are the founders of and officers of a publicly traded robotics company named GeckoSystems International Corporation ("GeckoSystems").

12.

Several years ago, GeckoSystems hired Neil Wallace to assist with legal work.

13.

Wallace performed poorly, and his employment was terminated.

14.

Wallace subsequently filed a lawsuit in Georgia, seeking damages from GeckoSystems. Wallace refused to comply with a Court Order to apply for *pro hac vice* since he is an attorney. The case of later dismissed.

15.

Next, Wallace filed two lawsuits in the state of Delaware where GeckoSystems was incorporated at the time. One was for himself, and the other for his parents, Harold Wallace and

Bette Wallace. At the time, Spencer was unable to hire a lawyer, and two default judgments were obtained, one for Wallace and the other for Harold Wallace and Bette Wallace.

16.

Wallace used his parents' judgment to levy against a block of stock owned by Martin Spencer.

17.

Pursuant to the levy, the Estate of Harold Wallace and Bette Wallace were able to obtain title to Spencer's stock for significantly less than market value. They paid $1,000 for his stock valued at $1,116,151 at the time of the sale which was significant unjust enrichment for the Wallace family.

18.

Wallace's default judgment is presently being litigated in Delaware.

19.

Thereafter, Wallace inexplicably became obsessed with causing damage to Plaintiffs and manipulating the value of GeckoSystems stock.

20.

This obsession was manifested in numerous frivolous lawsuits and warrant applications filed by Wallace in hundreds, if not thousands, of defamatory internet postings by Wallace, by attempts to manipulate and to drive down the price of GeckoSystems stock and by other acts of intimidation.

21.

By way of example only, these false statements which were publicly made on stock message boards:

(a) On June 9, 2015, Defendant Wallace, using the screen name *rms_savior* falsely accused Plaintiff of lying in Court filings;

(b) On June 4, 2015, Defendant Wallace, using the screen name *navy12272325* falsely accused Plaintiff of lying to the judge in a case pending in Delaware;

(c) On May 26, 2015, Defendant Wallace, using the screen name *moron_martin* falsely stated that "Despite no sales, revenues or profits and negative ROI, [Mr. Spencer] awarded himself and [Mrs. Spencer] 120 million shares for 'services rendered.

(d) On April 6, 2015, Defendant Wallace, using the screen name *moron martin* falsely stated that "[Mr. Spencer] has six kids from four different women."

(e) On February 25, 2015, Defendant Wallace, using the screen name *moron martin* falsely stated that "[Mr. Spencer] today confessed to animal cruelty . . . Since [Mr. Spencer] is a criminal wanted in two states, he likely abused small animals as a child."

(f) On January 14, 2014, Defendant Wallace, using the screen name *moron martin* falsely accused Plaintiffs of involvement in a multimillion-dollar embezzlement scheme and suggested that they had improperly taken money from a relative.

(g) On January 15, 2015, Defendant Wallace, using the screen name *robotgeek62*, falsely accused Plaintiffs of participating in an embezzlement scheme.

(h) On August 12, 2013, Defendant Wallace, using the screen name *robotgeek62* falsely stated that Mr. Spencer had undergone a sex change operation; and

(i) On July 12, 2013, Defendant Wallace, using the screen name *robotgeek62* falsely accused Spencer of "being raised by an anti-semite and a homophobe . . ."

22.

These are only a few of the myriad examples of false and defamatory statements made by Wallace. Similar false statements have been made by Sims.

23.

Additionally, Defendant Wallace has physically stalked Plaintiffs and, on one occasion, left a decapitated rabbit at Plaintiffs' residence. A 30 day Protective Order was entered on Plaintiffs' behalf as a result of Defendant Wallace's conduct. However, due to jurisdictional matters the judge was unable to grant a permanent Protective Order.

24.

Additionally, Neil Wallace conspired with Sims to file a frivolous and malicious lawsuit in Georgia, falsely accusing Plaintiffs of embezzling funds from an elderly family member.

25.

This lawsuit was dismissed, and Sims was sanctioned in the amount of $10,000.00.

26.

Plaintiffs have been significantly damaged as a direct and proximate result of the foregoing acts by Wallace.

COUNT ONE - LIBEL AND LIBEL *PER SE*

27.

All paragraphs of this Complaint are hereby incorporated into this paragraph by this reference as if fully restated verbatim herein.

28.

Defendants have engaged in libel and libel *per se* by publishing false and defamatory statements intended to injure Plaintiffs in their trade or business.

29.

Plaintiffs are entitled to judgment against Defendants for libel and libel *per se*.

30.

Plaintiffs have been damaged as a result of Defendants' conduct.

31.

Plaintiffs are entitled to recover damages, post-judgment interest, costs, and all litigation expenses, including reasonable attorneys' fees and costs of collection against Defendants.

COUNT TWO – SLANDER AND SLANDER *PER SE*

32.

All paragraphs of this Complaint are hereby incorporated into this paragraph by this reference as if fully restated verbatim herein.

33.

Defendants have made specific false and defamatory oral statements about Plaintiffs concerning Plaintiffs' business.

34.

Defendants have engaged in slander *per se* by knowingly publishing false statements intended to injure Plaintiffs in their trade or business.

35.

Plaintiffs have been damages as a result of Defendants' conduct.

36.

Plaintiffs are entitled to judgment against Defendants for libel and libel *per se*.

37.

Plaintiffs are entitled to recover damages, post-judgment interest, costs, and all litigation expenses, including reasonable attorney's fees and costs of collection.

COUNT THREE – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

38.

All paragraphs of this Complaint are hereby incorporated into this paragraph as if fully restated verbatim herein.

39.

Defendants have engaged in extreme and outrageous conduct with the intent of disrupting Plaintiffs' personal and professional lives.

40.

Plaintiffs have suffered severe emotional distress as a result of Defendants' conduct.

41.

Defendants are liable to Plaintiffs for intentional infliction of emotional distress.

42.

Plaintiffs are entitled to recover from Defendants jointly and severally for all damages suffered by Plaintiff as a result of the Defendants' conduct together with post-judgment interest, attorneys' fees, litigation expenses and costs from Defendants.

COUNT FOUR – TORTIOUS INTERFERENCE WITH BUSINESS RELATIONS

43.

All paragraphs of this Complaint are hereby incorporated into this paragraph as if fully restated verbatim herein.

44.

With regard to Plaintiffs' business relations, Defendants have engaged in improper and wrongful actions without privilege.

45.

Defendants' actions were purposeful, malicious and intended to injure Plaintiffs in their business relations.

46.

Defendants' actions have caused third parties to discontinue their business relations with Plaintiffs.

47.

Defendants are liable to Plaintiffs for tortious interference with business relations.

48.

Plaintiffs are entitled to recover from Defendants jointly and severally for all damages suffered by Plaintiff as a result of the Defendants' conduct.

COUNT FIVE – TORTIOUS INTERFERENCE WITH POTENTIAL BUSINESS RELATIONS

49.

All paragraphs of this Complaint are hereby incorporated into this paragraph as if fully restated verbatim herein.

50.

With regards to Plaintiffs' potential business relations, Defendants have engaged in improper and wrongful actions without privilege.

51.

Defendants' actions were purposeful, malicious and intended to injure Plaintiffs in their potential business relations.

52.

Defendants' actions have prevented third parties from entering into business relations with Plaintiffs.

53.

Defendants are liable to Plaintiffs for tortious interference with potential business relations.

54.

Plaintiffs are entitled to recover from Defendants jointly and severally for all damages suffered by Plaintiff as a result of the Defendants' conduct as well as their reasonable attorneys' fees, litigation, costs and post-judgment interest.

COUNT SIX – TORTIOUS INTERFERENCE WITH CONTRACTUAL RELATIONS

55.

All paragraphs of this Complaint are hereby incorporated into this paragraph as if fully restated verbatim herein.

56.

With regards to Plaintiffs' contractual relations, Defendants have engaged in improper and wrongful actions without privilege.

57.

Defendants' actions were purposeful, malicious and intended to injure Plaintiffs in their business relations.

58.

Defendants' actions have caused third parties to breach their contractual obligations to Plaintiffs.

59.

Defendants are liable to Plaintiffs for tortious interference with contractual relations.

60.

Plaintiffs are entitled to recover from Defendants jointly and severally for all damages suffered by Plaintiff as a result of the Defendants' conduct as well as their reasonable attorneys' fees, litigation expenses, costs and post-judgment interest.

COUNT SEVEN – VIOLATIONS OF GEORGIA RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT O.C.G.A. §§ 16-14-1, *et seq.*

61.

All paragraphs of this Complaint are hereby incorporated into this paragraph as if fully stated verbatim herein.

62.

Defendants have, through a pattern of racketeering activity, acquired and maintained, directly and indirectly, an interest in an enterprise, *to wit*, stock in GeckoSystems from Plaintiff.

64.

Defendants' pattern of racketeering activity consists of multiple acts of mail fraud, wire fraud, stock manipulation and perjury.

64.

Defendants have threatened and intimidated Plaintiffs and manipulated the courts in order to accomplish their unlawful scheme.

65.

Plaintiffs have been damaged as a result of the foregoing conduct.

66.

Defendants' acts, as set forth herein, violate O.C.G.A. §16-14-1, *et. seq.*

67.

Plaintiffs are entitled to recover from Defendants jointly and severally for all damages suffered by Plaintiff as a result of the Defendants' conduct as well as their reasonable attorneys' fees, litigation expenses, costs and post-judgment interest.

COUNT EIGHT – RECOVERY OF ATTORNEYS' FEES AND COSTS OF LITIGATION

68.

All paragraphs of this Complaint are hereby incorporated into this paragraph as if fully restated verbatim herein.

69.

Defendants have acted in bad faith, have been stubbornly litigious and have caused Plaintiffs unnecessary trouble and expense.

70.

Pursuant to O.C.G.A. § 13-6-11, Plaintiffs are entitled to recover their reasonable fees and expenses of litigation from Defendants.

ALLEGATIONS REGARDING PUNITIVE DAMAGES

71.

Defendants have each committed intentional and malicious torts upon Plaintiff and are each liable to Plaintiff for punitive and exemplary damages. Said Defendants' acts, omissions, breaches, violations of law and tortious conduct have damaged Plaintiff in an amount to be proven at trial.

72.

The actions of Defendants in this case each demonstrate willful misconduct, malice, fraud, wantonness, oppression and that entire want of care which raises the presumption of conscious indifference to consequences.

73.

Said Defendants' actions were specifically intended to harm Plaintiffs, and, thus, Plaintiffs are entitled to recover punitive and exemplary damages from such Defendants without limitation.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully demands a jury trial in this action with respect to all claims and issues in this action triable to a jury by law and respectfully requests the following relief:

(a) That Plaintiffs be awarded judgment in this action against Defendants, jointly and severally;

(b) That Plaintiffs recover all legally cognizable damages of every kind, however denominated, from Defendants, jointly and severally, together with post-judgment interest;

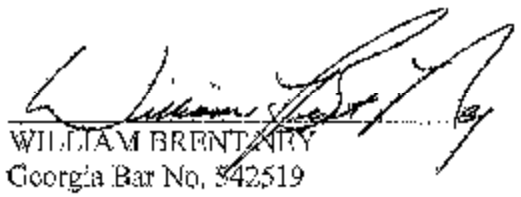
(c) That Plaintiffs recover from Defendants, jointly and severally, all of their reasonable attorneys' fees and expenses of litigation incurred by Plaintiff in the prosecution of this action;

(d) That Plaintiffs recover from Defendants, jointly and severally, all costs incurred by Plaintiff in this action; and

(e) That Plaintiffs recover from Defendants, jointly and severally, all additional remedies and/or relief of every kind that this Court may deem just and proper.

Dated: July 10, 2015

Respectfully submitted,



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