

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION**

BENJAMIN JOSEPH LIGERI,

)

)

Plaintiff,

)

)

v.

)

Civil Action No. 2:25-cv-00829-KKE

)

NATALIA PARKER,

)

JURY TRIAL DEMANDED

ERIC SMITH, and

)

JOHN MAGLIERY

)

)

Defendants.

)

**COMPLAINT FOR PERJURY, FRAUD ON THE COURT,  
RULE 11 VIOLATIONS, AND CONSPIRACY, AND  
REQUEST FOR SANCTIONS AND DAMAGES**

**I. INTRODUCTION**

1. This complaint arises from a coordinated effort by employees and legal representatives of Amazon.com, Inc. to defraud the United States District Court (case no. 3:23-cv-00603-JAM) by presenting and defending knowingly false declarations, misleading testimony, and strategic omissions regarding Plaintiff's relationship to various Amazon seller accounts. The falsehoods advanced by the Defendants resulted in the improper referral of Plaintiff's claims to arbitration and the denial of due process.

## II. JURISDICTION AND VENUE

2. Jurisdiction is proper under 28 U.S.C. § 1331 (federal question) and 18 U.S.C. § 1621 (perjury statutes).

3. Venue is proper in the Western District of Washington pursuant to the forum selection clause contained in the Amazon Business Solutions Agreement ("BSA"), which, while not governing the substantive claims asserted herein, establishes venue for disputes arising from proceedings connected to Amazon's marketplace operations.

4. All Defendants participated in litigation or submitted materials tied to this forum. Defendant Magliery specifically invoked the BSA in his filings on behalf of Amazon and is therefore subject to jurisdiction and venue in this Court.

## III. PARTIES

5. Plaintiff Benjamin Ligeri is an individual residing at 3120 Corey Rd, Malabar, Florida 32950.

6. Defendant Natalia Parker is or was employed as a litigation paralegal for Amazon.com, Inc.

7. Defendant Eric Smith is or was a Risk Manager at Amazon.com, Inc. who testified as a witness in support of Parker's claims.

8. Defendant John Magliery is an attorney who appeared on behalf of Amazon in proceedings against the Plaintiff, submitted Parker's affidavit, and relied on it despite incontrovertible evidence of falsity.

## IV. FACTUAL ALLEGATIONS

7. On June 23, 2023, Defendant Natalia Parker submitted a sworn declaration falsely stating that Plaintiff registered several Amazon seller accounts that he clearly had no role in registering. These statements were material to Amazon's motion to compel arbitration and were relied upon by the court. The damage caused to Plaintiff was catastrophic. (See Exhibit E)

1 8. In truth, the Amazon seller accounts at issue in the case — Twin Horses, Medcare, and Global  
2 Specialty Products — were originally created and registered by third parties, years before Plaintiff  
3 acquired any ownership interest. Amazon knew this, as it maintains full internal records of account  
4 registrants.

5 While Plaintiff later acquired ownership in the businesses operating these accounts, he did not  
6 create or personally register the Amazon accounts and was therefore never prompted to accept the  
7 Business Solutions Agreement ("BSA") containing the arbitration provision — a prompt presented  
8 only during original account creation, not at the account transfer stage.

9  
10 Had Amazon wished to require subsequent owners to assent to the BSA or to arbitration, it could  
11 have modified its platform architecture to do so, but it chose not to. Supporting affidavits and  
12 purchase agreements confirming this timeline were submitted to the Court. **(See Exhibits A–D)**

13 9. On April 8, 2024, Defendant Eric Smith—a legally trained risk manager operating within  
14 Amazon's internal risk and compliance apparatus—testified under oath, reinforcing Parker's  
15 narrative by referencing account fields and LLC associations while simultaneously admitting that he  
16 could not verify who originally registered the accounts.

17 Despite his professional background and understanding of the inherent limitations of Amazon's  
18 internal systems, Smith gave testimony designed to falsely connect Plaintiff to account registrations  
19 that predated Plaintiff's ownership. Smith's testimony demonstrated not inadvertence but a  
20 deliberate effort to mislead the Court, undertaken with knowledge of the actual registrant data  
21 Amazon internally possessed. **(See Exhibit F)**

22  
23 10. Smith testified that his team intervenes "when an account holder is stuck going in circles with  
24 Appeals" and "not getting any resolution," but no such intervention occurred for Plaintiff despite  
25 repeated appeals and substantiating evidence. **(See Exhibit F.)** The absence of intervention in  
26 Plaintiff's case was inconsistent with Amazon's stated appeal policies and Risk Management  
27 protocols as outlined by Eric Smith who runs the department, but entirely consistent with a pattern  
28 of retaliatory misconduct arising from Plaintiff's protected efforts to challenge Amazon's prior  
actions.

1 Smith's role within Risk Management placed him in a position to either intervene to correct  
2 wrongful account actions or to selectively withhold such intervention. His failure to act on  
3 Plaintiff's substantiated appeals, despite acknowledging the internal policy to assist sellers trapped  
4 in appeal loops, contributed materially to the retaliatory harms suffered by Plaintiff. The following  
5 misconduct by the remaining Defendants compounded the initial harm, perpetuating the fraud on  
6 the Court and intensifying the commercial and procedural injuries suffered by Plaintiff.

7 11. Defendant John Magliery, acting as an officer of the Court, submitted Parker's affidavit  
8 containing knowingly false declarations and failed to correct the record even after Plaintiff  
9 submitted detailed rebuttal documentation supported by primary source evidence. Magliery  
10 knowingly relied on testimony from Smith that selectively omitted critical exculpatory information,  
11 and he continued to press a false narrative despite having access to Amazon's internal registration  
12 records that directly contradicted his claims. Magliery's conduct constituted an active abuse of his  
13 role as an officer of the Court, materially misleading the tribunal and obstructing Plaintiff's access  
14 to lawful adjudication of his claims. **(See Exhibit G)**

15 12. True and correct copies of supporting materials referenced herein are attached as **Exhibits A**  
16 **through G**. These include affidavits, transfer agreements, transcript excerpts, and attorney conduct  
17 analyses that collectively demonstrate the falsehood of the claims advanced by Defendants and the  
18 resulting fraud on the tribunal.

19 13. Although Plaintiff has complied by submitting the narrow subset of his claims subject to  
20 arbitration in said forum, representing only a small fraction of his overall legal injuries, he has also  
21 redrafted and refiled the balance of his claims, along with newly arising claims, in this Court,  
22 pursuant to the forum directives issued by the United States District Court for the District of  
23 Connecticut.

24 During this time, Plaintiff continued to suffer escalating brand hijackings, commercial interference,  
25 and retaliatory enforcement actions orchestrated by Amazon. Plaintiff lost numerous wholesale  
26 clients whose seller accounts were shut down by Amazon in acts of retaliation—accounts which  
27 Plaintiff did not own or operate. Amazon also targeted Plaintiff's brands and listings directly  
28 through expanded enforcement actions.

1 Amazon leveraged its privileged access during the prior proceedings to identify and sabotage  
2 critical commercial relationships, resulting in lost sales valued in the hundreds of thousands and  
3 future opportunities reasonably projected into the millions. These injuries are directly traceable to  
4 the Court's reliance on false evidence and the resulting obstruction of Plaintiff's right to litigate his  
5 claims in a lawful judicial forum.

6 The misconduct detailed herein is consistent with broader patterns of racketeering and retaliatory  
7 commercial sabotage already raised in Plaintiff's separately filed RICO action.

## 8 9 **V. CLAIMS FOR RELIEF**

10  
11 COUNT ONE – Perjury (against Natalia Parker)

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13 COUNT TWO – False Declaration (against Natalia Parker)

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15 COUNT THREE – Rule 11 Violation (against Natalia Parker and John Magliery)

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17 COUNT FOUR – Fraud on the Court (against all Defendants)

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19 COUNT FIVE – Conspiracy to Defraud the Court (against all Defendants)

## 20 21 **VI. PRAYER FOR RELIEF**

22  
23 WHEREFORE, Plaintiff respectfully requests that the Court:

- 24  
25 1. Refer this matter for investigation under applicable federal perjury and fraud statutes;  
26  
27 2. Strike the false declarations and associated testimony from the record in related proceedings;  
28  
3. Impose Rule 11 sanctions on Parker and Magliery;  
4. Award damages resulting from the improper dismissal and diversion of Plaintiff's claims, the

1 retaliatory commercial sabotage carried out by Defendants, and the broader prejudice to Plaintiff's  
2 ability to seek and obtain judicial redress, including but not limited to lost time, legal costs, client  
3 losses, and lost business opportunities.

4 5. Grant such other relief as the Court deems just and proper.  
5

6 **EXHIBIT INDEX**  
7

8 Exhibit A: Declaration of Plaintiff Benjamin Ligeri  
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10 Exhibit B: Ownership Proof – Global Specialty Products, LLC  
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12 Exhibit C: Purchase and Sales Agreement – Twin Horses (Tim Mignacca)  
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14 Exhibit D: Medcare Amazon Transfer Documentation  
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16 Exhibit E: Affidavit of Natalia Parker  
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18 Exhibit F: Transcript Analysis of Eric Smith's Testimony (April 8, 2024)  
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20 Exhibit G: Analysis of Attorney John Magliery's Role in Facilitating Fraud on the Court  
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22 Respectfully submitted,  
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