

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS
SPRINGFIELD DIVISION**

SCOTT PHILLIP LEWIS,
Plaintiff,

v.

**MGM Springfield, LLC; MGM
Springfield Redevelopment, LLC; Vici
Properties, Inc.; MGM Resorts
International Operations, Inc.**
Defendant.

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ORIGINAL COMPLAINT

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JURY TRIAL DEMANDED

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I. PARTY OF THE DECADE

1. Plaintiff is Scott Phillip Lewis (“Plaintiff”), an individual and citizen of the United States of America.
2. Defendant #1 is Mary Kennedy is an individual who can be served at 3830 Howlett Hill Road, Syracuse, New York 13215.
3. Defendant #2 is Scott Heggelke is an individual located at 22 Jersey Drive, Lake Placid, New York 12946.
4. Defendant #3 is Edward Defurio is an individual residing at 203 Merriwether Drive, Syracuse, New York 13219.
5. Defendant #4 is MGM Springfield, LLC. is a Domestic Limited Liability Company located at ONE MGM WAY SPRINGFIELD, MA 01103
6. Defendant #5 is MGM Springfield Redevelopment, LLC. is a Domestic Limited Liability Company located at 100 FRANKLIN STREET 9TH FLOOR BOSTON, MA 02110
7. Defendant #6 is Vici Properties, Inc., the owner of MGM Springfield, located at 535 MADISON AVENUE, 28TH FLOOR, NEW YORK, NY, UNITED STATES, 10022.
8. Defendant #7 is MGM Resorts International Operations, Inc. is located at 770 S Edmond

St, Las Vegas, NV 89118

II. Jurisdiction and Venue.

9. Jurisdiction is correct pursuant to 28 USC § 1331 because this complaint contains a question of federal law.
10. Venue is correct in the District of Massachusetts, Springfield division pursuant to 28 USC § 1331 because a substantial part of the events or omissions giving rise to the claim occurred.

III. FACTS

“Hey now, look around whose back again?
Austin, Texas, California, rehab in Michigan
Ou, whoa, what’s that now I’m in the middle,
Call me Malcolm, tryna to lose my ex
The past, it’s a riddle.
Hey now, what’s next?
Save your judgment for the ending
Sending all perception players circumventing their pretending
N.R.A, Lapierre with an all-time backfire
Ted Cruz tweets at Big Bird, Paxton needs his pacifier”

11. Those were the words spoken in a July 12, 2022 instagram video posted to my account, @i.b.ballin. What happened after is the basis of this complaint. But before explaining what happened after the publishing of this rhyme, I would like to offer the Court historical facts in attempts to provide clarity and context to a confusing and chaotic set of circumstances in which I have been violated. This is a claim regarding human trafficking, forced labor and attempted kidnapping through the use of hypnosis.

PRIOR TO JULY 12, 2022

12. As a senior at West Genesee High School, I wrote a paper on gambling addiction for an advanced placement English class associated with Syracuse University called Syracuse

University Project Advance.

13. At the 2008 Senior Ball, I was hypnotized in front of the audience, which included Edward Defurio.
14. During this timeframe, individuals, including some from Syracuse University and West Genesee High School, embarked on a decades-long attempt to steal my intellectual property while invading and violating my privacy. The goal was to create a false narrative in order to justify doing so. In addition, by violating my privacy, it was believed that I would no longer be an obstacle for these individuals' politically motivated pursuits. False narratives could always be spun and have for several years. After being hypnotized in 2008, I was thought of as a source of entertainment for others, and nothing more, by some big bigoted, money-grubbing individuals. This has been further exacerbated by District Attorneys who turn a blind eye to Justice, such as William Fitzpatrick.
15. In 2009, I enrolled at Western New England College in Springfield, Massachusetts as a Sports Management major. The introduction class was taught by Sharianne Walker.
16. During my freshman year, students were required to invent a new product for a marketing class by Elizabeth Elam. I came up with a refrigerator in a couch.
17. Another student came up with an alternative ending to a basketball game in which a target score would be reached instead of using a clock to end games. This idea is now known as the Elam Ending for The Basketball Tournament, a basketball tournament with a winner take all cash prize.
18. Upon information and belief the Elam Ending was first used in 2017 and is not credited with the individual from Elizabeth Elam's class.

19. My sophomore year I switched majors to Finance, ultimately graduating with a degree in this field with a minor in Enterprise Resource Planning and Economics.
20. Prior to graduating, my arm was shattered in a construction accident. My left wrist is severely broken, requiring a fixation with screws and plates used to piece the arm back together. Surgery was performed at Upstate Orthopedics in East Syracuse, New York. After surgery, I was prescribed Oxycontin, a pain killer known for its high risk for addiction and dependence. Oxycontin was originally advertised as not being addictive by distributors such as Purdue Pharmaceuticals located in Stamford, Connecticut.
21. The Johns Hopkins Medicine website explains “[w]hen pain becomes such a problem that it interferes with your life's work and normal activities, you may become the victim of a vicious circle. Pain may cause you to become preoccupied with the pain, depressed, and irritable. <https://www.hopkinsmedicine.org/health/conditions-and-diseases/chronic-pain#:~:text=Pain%20may%20cause%20you%20to,suffering%2C%20sleeplessness%2C%20and%20sadness>).
22. Despite the major injury and chronic pain, I overcame the obstacles and worked as a Financial Representative Intern for Northwestern Mutual's Springfield office while playing NCAA Division III Lacrosse at Western New England. Due to the severe chronic pain, I did not complete the season with the team.
23. After graduation, I moved to Syracuse, New York and worked as a Financial Representative for Northwestern Mutual in Syracuse, New York under Timothy Barnhardt of Baldwinsville, New York.
24. The girl I dated in college broke up with me on January 22, 2014 while she was completing her senior year at Western New England and I was living in Syracuse, New

York working for Northwestern Mutual under Timothy Barnhardt.

25. I met Nicole Olech of Syracuse University on or around January 24, 2014 at Mulrooney's, a bar in Syracuse, New York owned by Joe Rainone. Nicole is a graduate of S.I. Newhouse School Of Public Communications.
26. Upon information and belief, Nicole Olech was dating Dan Frigolette of Baldwinsville, New York at the time. Dan Frigolette is now a stand up performer located in New York, New York.
27. In April 2014, Nicole Olech asked me to accompany her for a trip to Ottawa, Canada. Nicole's best friend was Stephanie Belanger, a Canadian attending school at Le Moyne College. Stephanie Belanger's cousin is Luke Cometti of Syracuse University.
28. Stephanie Belanger's instagram handle is @thatfrenchbitch.
29. I was told that Stephanie's mother needed a ride to a train that would get her home and needed a transport from Nicole. I agreed to accompany Nicole in giving Stephanie's mother a ride so she could get to where she needed to go.
30. The following day, Nicole wanted to stay in Ottawa longer than she told me we would. I was adamant we were returning to Syracuse, New York so I could continue studying for my FINRA Series 66 exam. I was not aware of any other motive or reason that Nicole or her mother would be in Ottawa at all times.
31. Upon information and belief, the trip was designed to create a false narrative, the extent of which I am still investigating.
32. I moved to Austin, Texas in September 2014 for a job as a Derivatives Trading Specialist for optionsXpress, a subsidiary of Charles Schwab. I had past my Series 3, 7, and 63 and was enjoying life while overcoming all the adversity I had faced. I also coached two

lacrosse teams for Vandegrift High School and a team for Ironhorse lacrosse on the side.

I was working hard each and every day while trying my best to manage the chronic pain from the severely deformed left wrist I have.

33. I created the instagram handle @i.b.ballin around this timeframe inspired by coaching lacrosse and a phrase I used through college.

34. In November 2015, I was involved in a hit and run accident in which my head broke a glass windshield. I had a concussion that impacted my cognitive functioning. I started to develop symptoms of post-traumatic stress disorder (“PTSD”) by having flashbacks. I felt lucky that I did not break my neck. It was a traumatizing experience.

35. After the progression of symptoms of PTSD and ADHD from the 2015 hit and run accident and lack of police follow up, I had developed an alcohol abuse disorder over time. While some could see the alcohol abuse, the root cause of the symptom went undiagnosed for a very long time. Even though I understood the symptoms I was experiencing, I was bombarded with conflicting opinions by individuals who did not care about the full truth, but instead focused on selective facts that best fit a desired narrative and bias.

36. In 2024, I learned the City of Austin Police had omitted my name and witness statements from the police report of the hit and run accident. The false narrative was that I was paranoid schizophrenic since attempts to label me an alcoholic or get me hooked on Oxycontin had failed. Those participating in a cover-up and conspiracy tried to pretend I was “making up” being involved in the 2015 hit and run accident.

37. One symptom of PTSD that had developed was attention deficit hyperactivity disorder (ADHD). After prolonged PTSD, ADHD symptoms were becoming more consistent.

On or around July 2018, a former roommate and also a coach at Vandegrift Lacrosse Club told me that he had paid money to have a man killed over a disagreement in a lacrosse game.

38. Stunned by such evil, I experienced an even further increase in ADHD and PTSD symptoms and separately, an increase in alcohol abuse, which is a symptom of PTSD. The police report from San Marcos PD is filled with lies about me and the situation, a consistent pattern.
39. I made the choice to go to “A Forever Recovery,” a rehabilitation facility in Battle Creek, Michigan. I knew this was not a good fit, almost immediately, as the facility wanted to focus solely on the alcohol abuse and not the reasons that caused such a symptom. It was a continuation of false narratives being created since I graduated high school in 2008. I felt as if I were at a cult and made the decision to leave after approximately thirteen (13) days.
40. This experience affected my overall well-being. “A Forever Recovery” is now believed to be permanently closed. Also, upon information and belief, A Forever Recovery is associated with Scientology, the cult that operates as a religion in order to gain tax benefits.
41. The design was to make it look like I had a drinking problem and only a drinking problem while ignoring what caused symptoms of PTSD.
42. On January 25, 2019, I was arrested for driving while intoxicated in Williamson County, TX. Selective, manipulated and edited portions of the arrest were broadcast to over a million viewers on a television show advertising the edited arrests they were broadcasting as “unfiltered and unfettered,” when in fact, it was not.

43. This show was called “LivePD,” a hit television show that used law enforcement as entertainment. If an arrest was standard, it was less likely to be shown on television.
44. I suffered an anxiety attack when learning upon the non-consensual broadcast of the arrest and had his left shoulder broken by Williamson County Jail Staff.
45. I was then strapped to an immobilized chair for hours, having his blood drawn with a broken shoulder for a predictable reaction to an obvious constitutional violation and tainted trial.
46. My constitutional rights were not kept intact. It took three (3) years and three (3) months for Texas Attorney General Ken Paxton (“Paxton”) to dismiss charges for insufficient evidence. Paxton is still figuring out a way to make the mess created by “LivePD” go away without telling the truth.
47. That’s what Scientology and its members are. They are perception players. They don’t care about what is real; they care about making it look real and tricking others so they can have profit and power. I believe the truth is powerful and what God desires. This is why the cult of Scientology, who value money before anything else, disagrees with me.
48. My broken shoulder has never been treated despite numerous attempts to do so. In December 2024, an MRI showed that a rotator cuff and labrum were also torn from the jail assault that occurred on January 25, 2019. This means that I have gone over six (6) years in pain and without treatment on the shoulder from the side of the arm that was also severely deformed in 2012. At least I’m alive to fight the injustice. Javier Ambler was killed by the same police department for not dimming his headlights as “LivePD” cameras were present. Not surprising, the sloppy Texas Attorney General Ken Paxton hasn’t supported the Constitution of the United States of America in prosecuting the

felony tampering with evidence charges involving ex-Sheriff Robert Chody and current Williamson County General Counsel Jason Nassour related to Javier Ambler's death in March 2019.

49. In 2021, I moved to Lake Placid, New York to fully heal the chronic pain and PTSD symptoms I was encountering and gearing up for a Congressional run to take Elise Stefanik's job. Instead of finding peaceful solitude in Lake Placid, New York, I was met with a barrage of Constitutional, Federal and State violations. These were unconstitutional attempts to keep me off balance, discredit myself and inflame symptoms of PTSD for ulterior political motives.

AFTER JULY 2022

50. After posting the rhyme shared in the introduction of this section to instagram on July 12, 2024, I drove from Lake Placid, New York to Solvay, New York, a suburb outside Syracuse for a hearing on July 14, 2024. The "attorney" hired for a misdemeanor operating without a license charge was Eileen Walsh.
51. Eileen Walsh was withdrawing from the matter when I refused to accept a plea deal. I hired Eileen Walsh with the expectation that we would go to trial. At the July 14, 2024 hearing for Eileen Walsh's withdrawal, in which her motion was littered with misrepresentations, Eileen didn't show up. She could talk fictitious smack but she couldn't face the music.
52. After Eileen didn't show, I decided to travel to Springfield, Massachusetts to visit my alma mater, Western New England University, in order to utilize the law library for various projects and lawsuits I was and continue to work on.
53. Before checking into a hotel, I decided to drive through the MGM Springfield entrance

and parking garage. I was with my dog and did not plan to go into the casino. I simply just wanted to check it out since the establishment was not in downtown Springfield when I was going to school there.

54. There was a deceptive sign that stated the entrance was to the right. Upon entering the garage and going right, as the sign suggested, my tire hit a curb and became flat. The sign was set up in order to turn right upon entering the garage in order to blow out your tire.

55. I parked the car and called for triple AAA as I assumed my membership would cover the flat tire. Unfortunately, my membership was supposedly not valid and triple AAA was unable to offer any assistance.

56. I went to the hotel lobby in order to get a room for the night to figure out the situation. There were no rooms for the night, which was surprising considering the eerie emptiness of the casino. I decided to relax in my car.

57. Around 4:30 AM, I walked down to the hotel lobby with my dog Justice. I was fighting myself to stay awake and was hoping to find a chair to close my eyes for a little bit. Instead, the hypnosis began.

58. The first song was "Somebody's watching me." The goal was to try to induce symptoms of psychosis.

59. After some time passed with subliminal music playing in a hotel lobby designed to stimulate the brain, I became transfixed on what looked like Scrabble pieces containing letters on the wall behind the reception desk. Some letters were turned on the side.

60. The design was to hypnotize for the purpose of kidnapping.

61. I was saying names of people by using the letters contained behind the desk. At one

point, I started to describe going to Canada with Nicole Olech.

62. I was meant to be framed as the patsy for activities I am unaware of to this day.

Eventually, I sat back down in a chair with my dog. Our Kodak Moment had just begun.

63. A man entered the lobby as I was beginning to get creeped out by the entire situation. He was on the phone and said something along the lines of “we have one.”

64. My dog, Justice, got up to greet the human being which snapped me out of the hypnotized state.

65. I asked the guy where I could use the restroom and then left.

66. I was stunned by what I just experienced. I felt like I was in a twilight zone.

67. I wanted to move my car from the MGM Springfield before leaving the City.

68. I went to MGM Springfield in a vehicle rented from the neighborhood Uhaul, only to find my keys locked in the passenger side of the car. I kicked out the passenger window and grabbed the keys. I drove the car on the rim back to the La Quinta, where I checked in after the casino debacle.

69. Before getting to the hotel, I was stopped by a parade of individuals who looked like zombies beating on the tops of cars. It appeared to be a parade of hypnotized individuals. The goal of the hypnosis was meant for kidnapping and human trafficking.

70. I rented a Uhaul van, as it was a cheaper option than a rental car, and weighed my options. I almost drove straight to Washington, D.C. to tell law enforcement about what I observed. However, I turned around and decided I would return to Lake Placid, New York and try to comprehend and process what I had witnessed.

71. Around the Albany area, I was following a Royal Limousine towards Schenectady, New York. It felt like I was in a trance. I could observe everything around me but I kept

following this Royal Limousine. It was leading me towards Schenectady, New York. I became panicked because I had just called out Wayne Lapierre on instagram. I was not interested in being anywhere near Wayne Lapierre's hometown. I eventually slammed on the brakes, right on the highway. This created separation between the Uhaul van and the Royal Limousine. This caused the trance I was in to subside completely. I went the opposite direction of the Royal Limousine driving west towards Syracuse, New York.

72. Along the way back to Lake Placid, I periodically stopped in front of cameras and took my own pictures to show that there was nothing in the back of the Uhaul.

IV. CLAIMS **Against all Defendants**

73. The foregoing is hereby incorporated as fully stated here within.

74. 18 USC § 1581 states

“[w]hoever holds or returns any person to a condition of peonage, or arrests any person with the intent of placing him in or returning him to a condition of peonage, shall be fined under this title or imprisoned not more than 20 years, or both. If death results from the violation of this section, or if the violation includes kidnapping or an attempt to kidnap, aggravated sexual abuse or the attempt to commit aggravated sexual abuse, or an attempt to kill, the defendant shall be fined under this title or imprisoned for any term of years or life, or both.”

75. The goal was to create such severe symptoms of PTSD and ADHD that I would be permanently in a state of hypnosis. Once in a state of hypnosis, the goal was to kidnap.

Thus, the events described are a violation of 18 USC § 1581.

76. Scott Heggelke, Mary Kennedy and Edward Defurio were interested in human trafficking and kidnapping . Other Defendants facilitated human trafficking and kidnapping.

V. DAMAGES

77. I suffered and claim the following damages:

- Past and future mental anguish
- Past and future impairment
- Past and future medical expenses
- Past and future loss of earning capacity

VI. JURY DEMAND

78. Plaintiff respectfully requests jury trial pursuant to FED. R. CIV. P. 48

VII. REQUEST TO ISSUE SUMMONS

79. Please issue proposed summons pursuant to Federal Rules of Civil Procedure (“FRCP”). I plan to freely amend after service pursuant to Rule 15 of FRCP after service.

VIII. PRAYER FOR RELIEF

80. Accordingly, I request that judgment be awarded against Defendants for:

- (1) Compensatory damages;
- (2) Punitive or exemplary damages;
- (3) Costs of Court;
- (4) Prejudgment and postjudgment interest at the highest rate allowable under law;
- (5) Unliquidated damages at the highest amount that is within the jurisdictional limits of the court;
- (6) And all over relief to which Plaintiff is justly entitled.

RESPECTFULLY SUBMITTED,

/s/Scott Phillip Lewis

Scott Phillip Lewis, *pro se*
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Lake Placid, NY 12946
scottphilliplewis@gmail.com
518-551-3061

VERIFICATION

I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct. Executed on July 11, 2025.

/s/ Scott Phillip Lewis