

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

RONALD M. DOLIN,

Plaintiff,

No. _____

vs.

**TRIAD NATIONAL SECURITY, LLC,
and TECHSOURCE, INC.**

Defendants.

PLAINTIFF'S ORIGINAL COMPLAINT

Plaintiff, by and through his undersigned attorney, for his causes of action against the Defendants, would show the Court the following:

GENERAL ALLEGATIONS

1. Plaintiff is a resident of New Mexico. Defendant Triad National Security, LLC ("TRIAD") is a contractor operating the Los Alamos National Laboratory ("LANL") or the ("Laboratory") for the Department of Energy and NNSA (National Nuclear Security Administration) Triad is incorporated in Delaware. Defendant Techsource, Inc. is a scientific and technical consulting firm, incorporated in New Mexico.
2. The Court has jurisdiction under 28 U.S.C 1331 because Defendants are federal contractors and the events giving rise to this lawsuit occurred on federally owned property. Venue is proper under 28 U.S.C 1391 in this Court because the events giving rise to this lawsuit occurred in this District.
3. Plaintiff was employed by LANL as a engineer and scientist, from 1983 to 2018. After his retirement from LANL, Plaintiff was employed by Defendant Tech Source, a not uncommon arrangement for retired LANL scientists.

4. In 2021, Plaintiff was approached by a publisher about writing and publishing a book. The subject matter of the book was to be Mr. Dolin's career at LANL in homeland security, and the proposed title was "The World's A Scary Place, but Los Alamos Keeps You Safe."

5. In July 2021, Mr. Dolin contacted the LANL Classification Officer, Diana Hollis, to determine the proper protocol for LANL to review the book on behalf of the DOE and NNSA to protect classified information.

6. Ms. Hollis, the Classification Officer, was an employee of Defendant Triad, and her job is to protect classified information. She instructed Mr. Dolin to go ahead and write the book and contact the Classification Office after the final editing of the book was completed for a classified information review. On October 17, 2022, Mr. Dolin contacted Ms. Hollis, as she had previously instructed him to do, to begin the LANL book review process for classified information.

7. Thereafter, Mr. Dolin's book was transmitted to the Classification Office for review and Mr. Dolin reminded Ms. Hollis and her staff members about the guidance he had been given by her in July of 2021 on the process to follow.

8. On November 7, 2022, Mr. Dolin attended a meeting with the LANL Security Investigation Team (SIT) and his division leader. Mr. Dolin was informed at this meeting that he was in jeopardy of some sort for transmitting a book into the public domain prior to having it reviewed. Ms. Hollis had failed to inform the SIT Investigator that she instructed Mr. Dolin to release the book to the publisher prior to having it reviewed. Mr. Dolin provided a summary of events to the SIT Investigator, and further provided emails confirming the events that occurred in July of 2021 and the guidance he was given.

9. After Mr. Dolin's approximately 80,000-word manuscript was reviewed, the derivative classifiers from LANL found one word which they asked Mr. Dolin to redact. He immediately

revised the manuscript to remove the word and sent it back to the Classification Office as an unclassified document, pursuant to the instructions given to him by the Classification Office.

10. On December 21, 2022, the SIT determined that the release of the book into the public domain was a high security related incident, but that Mr. Dolin had done nothing wrong and he was not cited with any security infraction.

11. The Triad/LANL Classification Office, however, was found to be in need of remediation and was instructed to complete a list of corrective actions.

12. On January 9, 2023, Mr. Dolin was informed that the book was not approved for publication. No specific concerns were mentioned and no valid justification for this decision was given.

13. Other meetings were held later in which Mr. Dolin attempted to gain permission from Triad/LANL to publish his book, on which he spent over 500 hours of his time. Neither the FBI nor CIA have ever stated any concerns about any classified information in the book and no outside agency has ever offered any concerns over the publication of the book, even to this day, although the LANL office represented it as a reason for refusal to allow publication.

14. Mr. Dolin was told that Ms. Hollis had determined that the book was classified and that nothing could be done to remedy that designation.

15. Three days after the April 17, 2023, meeting in which the book was determined not to be publishable, Mr. Dolin's security clearance was revoked, his contract with Triad was terminated, and he was fired by Techsource, Inc.

16. No justification for Mr. Dolin's termination has ever been given.

17. No reason for the decision not to allow the book to be published has never been stated, supported or justified.

FIRST CLAIM - WRONGFUL TERMINATION

18. The allegations of the General Allegations are incorporated herein by this reference.

19. Mr. Dolin was terminated by Defendants in retaliation for having brought to light the policy and procedure violations of the Triad/LANL Classification Office in advising Mr. Dolin to release his book to the publisher to finalize it before classification review, and his book was refused publication to attempt to cover LANL's own policy infractions.

SECOND CLAIM - CIVIL RIGHTS VIOLATION

20. The allegations of the General Allegations are incorporated herein by this reference.

21. Mr. Dolin's First Amendment rights to free speech and rights against unreasonable seizure of his property under the Fourth Amendment under the United States Constitution have been violated without justification by the unsupportable determination on the part of the Classification Office and LANL, acting on behalf of the Department of Energy, that Mr. Dolin's book cannot be published.

22. The factual statements in Mr. Dolin's book can be found on the internet, social media, or as otherwise released by LANL in the past.

THIRD CLAIM - PRIMA FACIE TORT

23. The allegations of the General Allegations are incorporated herein by this reference.

24. Defendants, by and through their employees and agents, committed a *prima facie* tort against Plaintiff, using what appears to be legal means with the intent to harm and injure him.

25. The actions of the Defendants were taken intentionally with the intent to harm Mr. Dolin, and there was no justification for the actions.

FOURTH CLAIM – INTERFERENCE WITH CONTRACT

26. The allegations of the General Allegations are incorporated herein by this reference.

27. Defendant Tech Source serves Triad as a provider of scientific and technical employees. It contracted with Plaintiff.

28. Triad, to protect its errors in the classification office from disclosure and to shift blame to Plaintiff, upon information and belief, instructed Tech Source to terminate Plaintiff.

29. Triad tortiously interfered with Plaintiff's contract with Tech Source, without justification.

FIFTH CLAIM – DAMAGES

30. The allegations of Paragraphs 1-29 are incorporated herein by this reference.

31. As a direct and proximate result of the wrongful acts and omissions of Defendants as set forth above, Plaintiff has been harmed. He has lost income, both from his employment and from royalties expected from his book, he has been subjected to humiliation and loss of reputation among his peers, and he has sustained emotional distress, and lost enjoyment of life, for all of which he seeks compensation, along with reimbursement of funds expended by Plaintiff for a trip undertaken at the behest of his employer.

WHEREFORE, Plaintiff prays that he have and recover judgment against the Defendants, and each of them, for his compensatory damages, for costs of suit incurred herein; for pre and post-judgment interest as provided by law; for reasonable attorney's fees and for such and further relief as the Court may deem to be just and proper.

Respectfully submitted,

THE PERRIN LAW FIRM

432 Galisteo St.

Santa Fe, New Mexico 87501

Telephone: (505) 989-8800

Facsimile: (214) 646-6117

Email: dougperrin@perrinlaw.org

Doug Perrin

Doug Perrin

ATTORNEY FOR PLAINTIFF