

UNITED STATES DISTRICT COURT

for the

District of Columbia

Civil Division

Dennis Sheldon Brewer, address and phone as shown below in I. A.

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Mr. Christopher Wray, Federal Bureau of Investigation, et al, official addresses as shown below in I. B.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. COMPLAINT AND REQUEST FOR EMERGENCY INJUNCTIVE RELIEF

(to be filled in by the Clerk's Office)

COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Dennis Sheldon Brewer
Street Address 1210 City Place
City and County Edgewater, Bergen
State and Zip Code New Jersey 07020
Telephone Number 201-887-6541
E-mail Address dsbrewer923@hotmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name	Mr. Christopher Wray
Job or Title (<i>if known</i>)	Director, Federal Bureau of Investigation
Street Address	935 Pennsylvania Avenue, NW
City and County	Washington
State and Zip Code	District of Columbia 20535-0001
Telephone Number	202-324-3000
E-mail Address (<i>if known</i>)	

Defendant No. 2

Name	Mr. Alejandro Mayorkas
Job or Title (<i>if known</i>)	Secretary, Department of Homeland Security
Street Address	245 Murray Lane, SW
City and County	Washington,
State and Zip Code	DC 20528-0075
Telephone Number	202-282-8000
E-mail Address (<i>if known</i>)	

Defendant No. 3

Name	Ms. Janet Yellen
Job or Title (<i>if known</i>)	Secretary, Department of the Treasury
Street Address	1500 Pennsylvania Avenue, NW
City and County	Washington
State and Zip Code	D.C. 20220
Telephone Number	202-622-2000
E-mail Address (<i>if known</i>)	

Defendant No. 4

Name	SEE ATTACHED LIST OF ADDITIONAL DEFENDANTS
Job or Title (<i>if known</i>)	
Street Address	Unknown
City and County	Unknown
State and Zip Code	Unknown
Telephone Number	Unknown

E-mail Address *(if known)* _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

Federal question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Defendants, through their operations, officers, agents, employees, contractors, and assigns, usurped authority not granted to Congress by the People under Section 8 of the United States Constitution. Defendants violated the human, Constitutional, and civil rights of Plaintiff, including the First Amendment, Fourth Amendment, Fifth Amendment, Sixth Amendment, Eighth Amendment, Ninth Amendment, Tenth Amendment, Thirteenth Amendment, and statutes pertaining to the enforcement of said Amendments. Plaintiff rights under the Federal Tort Claims Act were violated. This Complaint is brought under the auspices of the civil provisions of the Racketeering Influenced and Corrupt Organizations Act, the Klu Klux Klan Act of 1871, and the Federal Tort Claims Act. Subject matter jurisdiction is specifically granted to the Court by the FTCA under 28 USC 1346 (b) (1). Subject matter jurisdiction is specifically granted to the Court for deprivation of civil and constitutional rights under 42 USC 1983, 42 USC 1985, and 42 USC 1986. Subject matter jurisdiction under civil RICO is specifically granted to the Court under 18 USC 1964 (c).

Venue in the District of Columbia is proper as executive management and operational coordination of these functions is under the direction of federal Defendant Departments and Agencies located in the Washington, DC area.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* _____, is a citizen of the State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated

under the laws of the State of *(name)* _____ ,
and has its principal place of business in the State of *(name)*
_____ .

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* _____ , is a citizen of
the State of *(name)* _____ . Or is a citizen of
(foreign nation) _____ .

b. If the defendant is a corporation

The defendant, *(name)* _____ , is incorporated under
the laws of the State of *(name)* _____ , and has its
principal place of business in the State of *(name)* _____ .
Or is incorporated under the laws of *(foreign nation)* _____ ,
and has its principal place of business in *(name)* _____ .

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

Monetary damages amount cannot be properly identified at this time due to the Defendants durable pattern of misconduct against the Plaintiff, and due to Plaintiff's current inability to identify and describe each specific violation absent thorough discovery. The amount in controversy exceeds \$15,000,000.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

Within and without the boundaries of the United States, including, without limitation, Canada, Mexico, the United Kingdom, and potentially including in the physical jurisdiction of France, Italy, Luxembourg, and Switzerland. Plaintiff also operated internationally in other countries without physically stepping outside these jurisdictions.

B. What date and approximate time did the events giving rise to your claim(s) occur?

The pattern of events date from approximately 1980. These events involved "investigations" on a series of corrupt pretexts, including, without limitation, national security and counter-terrorism, which classifications were intended to keep them clothed in secrecy, and which permitted highly intrusive escalation in the post 9/11/2001 period by the Defendants and cooperating federal, state, and local agencies. The true extent, including the precise date of initiation of these acts, and the duration of the conduct by any specific federal or cooperating entity, cannot be reasonably ascertained by the Plaintiff without extensive discovery.

C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

See attached Plaintiff's Statements. Plaintiff has made prior attempts to cause the United States to cease its illegal and unconstitutional operations, delivered as a FTCA claim (never answered) to Defendants in late Summer 2005 in Washington, DC in and Seattle, Washington; and as filed in the United States District Court for the District of New Jersey at Newark, New Jersey on June 23, 2010. The fundamental goal of Defendants has been to evade accountability for a long running pattern of corrupt police power and intelligence operations of Defendants. Defendants have engaged the witting or unwitting cooperation of state and local authorities, as confirmed by the City of New York Police Department (NYPD), and described in Plaintiff's attached statement incorporating this NYPD derived Exhibit..

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

Defendants, which are principally Departments and Agencies of the United States, have conducted ongoing operations against Plaintiff, which continue as of the date of Plaintiff's signature on this Complaint. Please see Plaintiff's attached statements. Plaintiff has sustained and continues to sustain injury to his person; to his physical, mental, and emotional health; continued risk to life; to his rights to freely associate and communicate, among other impaired and infringed rights; and to his financial opportunities and well being.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff requests the Court (1) immediately order the Defendants and any other Departments or Agencies of the United States, including without limitation, their agents, contractors, and assigns, to cease and desist all their use of technology similar to but more sophisticated than the technology used by U.S. adversaries to cause and create the symptoms of Havana Syndrome. Such technology is an immediate and durable threat to the life and health of those persons, including Plaintiff, who are the objects of this technology both within and without the territory of the United States.

Plaintiff requests the Court (2) immediately order the United States to cease any and all such operations against U.S. persons outside the United States to avoid any further loss of life, liberty, or property by operation of this coercive technology.

Plaintiff requests (3) monetary damages in an amount which cannot be properly identified at this time due to the durable, decades-long pattern of misconduct against the Plaintiff. Plaintiff is current unable to identify and describe each specific violation absent thorough discovery. The amount in controversy will exceed \$15,000,000.

Recognizing the unique nature of Plaintiff's request for an emergency order of the court, Plaintiff notes that, if Plaintiff is incorrect in any detail of the identification and description of this technology, the United States will, in no way, be harmed by such an order. In this event, the immediate relief sought by Plaintiff will have absolutely no adverse impact on any investigation, operation, or proceeding of Defendants. Conversely, the harm to the Plaintiff and others will continue, may very well escalate, and may lead to bodily harm, permanent injury, or death of the Plaintiff or others, as it likely has to other US persons in the past, and such conduct against other US persons likely continues into the present.

Plaintiff recognizes that unique and novel technologies may not be in the Court's area of expertise, and respectfully requests the Court to suspend its initial disbelief. Both the State Department and CIA dismissed initial report of Havana Syndrome symptoms for a considerable period of time. Congress recently adopted legislation compensating victims of this previously dismissed set of medical injuries. Plaintiff has summarized his understanding of this technology, as directly and personally experienced, in lay language in statements attached to this Complaint. Said technology causes emotional trauma, physical pain, manufactured body movements, thoughts, and verbalizations which can endanger the life, and are directly detrimental to, the subject's human, constitutional, and civil rights, in a fashion similar to but more sophisticated than the Havana Syndrome symptoms described by State and CIA employees.

Further, in the opinion of the Plaintiff, the international deployment of this coercive technology, by the United States, has resulted in retaliatory attacks against State and CIA employees of the United States operating outside U.S. boundaries, causing the spectrum of symptoms known as the Havana Syndrome. On September 16, 2021, three days after the initial mailing of the first version of this case to the Court, the Secretary of Defense instructed all personnel to report any Havana Syndrome symptoms to the chain of command.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk’s Office with any changes to my address where case–related papers may be served. I understand that my failure to keep a current address on file with the Clerk’s Office may result in the dismissal of my case.

Date of signing: 12/01/2021

Signature of Plaintiff 

Printed Name of Plaintiff Dennis Sheldon Brewer

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____

Brewer v. FBI et al
Additional Defendants

DEFENDANT:

Hon. Merrick Garland
Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

DEFENDANT:

Ms. Avril Haines
Director of National Intelligence
Office of the Director of National Intelligence
Washington, DC 20511

DEFENDANT:

City of New York Police Department
Attention: Georgia Pestana
Corporation Counsel
New York City Law Department
100 Church Street
New York, NY 10007

DEFENDANT:

City of New York Police Department
Ernest F. Hart
Deputy Commissioner for Legal Matters
Attention: PALS Unit
375 Pearl Street, Box 39
New York, New York 10038

DEFENDANT:

John Does 1-99, including Federal Agencies and Departments to be identified during discovery.

**Plaintiff Brewer’s Statement on Prior Dismissals and the
Legal Obligation Under Denton v. Hernandez to Permit Continued Discovery**

1 Three D.C. Circuit judges (Hon. Judge Jackson, Hon. Judge Boasberg, and Hon. Judge
2 Kollar-Kotelly) previously concluded Plaintiff’s Complaints (Brewer v FBI et al 21-cv-02424,
3 Brewer v FBI et al 21-cv-02671, and Brewer v FBI et al 21-cv-02954) against the Defendants FBI
4 et al were frivolous. These judges dismissed the cases without prejudice as cited in their
5 Memorandum Opinions excerpted below:

6 21-cv-2424 Jackson September 27, 2021:

7 “This court cannot exercise subject matter jurisdiction over a frivolous complaint. Hagans v.
8 Lavine, 415 U.S. 528, 536-37 (1974) (“Over the years, this Court has repeatedly held that the
9 federal courts are without power to entertain claims otherwise within their jurisdiction if they
10 are ‘so attenuated and unsubstantial as to be absolutely devoid of merit.’ ”), quoting
11 Newburyport Water Co. v. Newburyport, 193 U.S. 561, 579 (1904); Tooley v. Napolitano, 586
12 F.3d 1006, 1010 (D.C. Cir. 2009) (examining cases dismissed “for patent insubstantiality,”
13 including where the plaintiff allegedly “was subjected to a campaign of surveillance and
14 harassment deriving from uncertain origins.”). Case 1:21-cv-02424-UNA Document 4 Filed
15 09/27/21 Page 2 of 3 A court may dismiss a complaint as frivolous “when the facts alleged rise
16 to the level of the irrational or the wholly incredible,” Denton v. Hernandez, 504 U.S. 25, 33
17 (1992), or “postulat[e] events and circumstances of a wholly fanciful kind,” Crisafi, 655 F.2d at
18 1307–08. The instant complaint satisfies this standard.”

19 21-cv-2671 Boasberg October 15, 2021:

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20 ““A complaint must contain sufficient factual matter, accepted as true, to ‘state a claim to relief
21 that is plausible on its face.’” Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009), quoting Bell Atl. Corp.
22 v. Twombly, 550 U.S. 544, 570 (2007). A complaint that lacks “an arguable basis either in law or
23 in fact” is frivolous, Neitzke v. Williams, 490 U.S. 319, 325 (1989), and a “complaint OCT. 15,
24 2021 Case 1:21-cv-02671-UNA Document 4 Filed 10/15/21 Page 1 of 2 2 plainly abusive of the
25 judicial process is properly typed malicious,” Crisafi v. Holland, 655 F.2d 1305, 1309 (D.C. Cir.
26 1981). On review of the complaint, the Court concludes that its factual allegations are
27 incoherent, irrational or wholly incredible, rendering the complaint subject to dismissal as
28 frivolous. See Denton v. Hernandez, 504 U.S. 25, 33 (1992) (“[A] finding of factual frivolousness
29 is appropriate when the facts alleged rise to the level of the irrational or the wholly
30 incredible[.]”).”

31 21-cv-2954 Kollar-Kotelly November 16, 2021

32 ““A complaint must contain sufficient factual matter, accepted as true, to ‘state a claim to relief
33 that is plausible on its face.’” Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009) (quoting Bell Atl. Corp.
34 v. Twombly, 550 U.S. 544, 570 (2007)). A complaint that lacks “an arguable basis Case 1:21-cv-
35 02954-UNA Document 3 Filed 11/16/21 Page 1 of 2 2 either in law or in fact” is frivolous,
36 Neitzke v. Williams, 490 U.S. 319, 325 (1989), and a “complaint plainly abusive of the judicial
37 process is properly typed malicious,” Crisafi v. Holland, 655 F.2d 1305, 1309 (D.C. Cir. 1981). On
38 review of the complaint, the Court concludes that its factual allegations are incoherent,
39 irrational or wholly incredible, rendering the complaint subject to dismissal as frivolous. See

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40 Denton v. Hernandez, 504 U.S. 25, 33 (1992) (“[A] finding of factual frivolousness is appropriate
41 when the facts alleged rise to the level of the irrational or the wholly incredible[.]”).”

42 The principal citations mentioned in their dismissals on the “facts” are summarized below:

43 Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009) “A complaint must contain sufficient factual matter,
44 accepted as true, to ‘state a claim to relief that is plausible on its face.’”

45 Neitzke v. Williams, 490 U.S. 319, 325 (1989) lacks “an arguable basis either in law or in fact” is
46 frivolous

47 Crisafi v. Holland, 655 F.2d 1305, 1309 (D.C. Cir. 1981) “complaint plainly abusive of the judicial
48 process is properly typed malicious,”

49 Denton v. Hernandez, 504 U.S. 25, 33 (1992) “when the facts alleged rise to the level of the
50 irrational or the wholly incredible,”

51 Tooley v. Napolitano, 586 F.3d 1006, 1010 (D.C. Cir. 2009) (examining cases dismissed “for
52 patent insubstantiality,” including where the plaintiff allegedly “was subjected to a campaign of
53 surveillance and harassment deriving from uncertain origins.”)

54 Hagans v. Lavine, 415 U.S. 528, 536-37 (1974)) (“Over the years, this Court has repeatedly held
55 that the federal courts are without power to entertain claims otherwise within their jurisdiction
56 if they are ‘so attenuated and unsubstantial as to be absolutely devoid of merit.’ ”), quoting
57 Newburyport Water Co. v. Newburyport, 193 U.S. 561, 579 (1904);

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58 In dismissing these Complaints, the Judges relied on inappropriate characterizations of
59 the facts of the Complaint, its alleged “frivolous nature,” “irrationality”, “patent
60 insubstantiality,” “attenuated and unsubstantial,” and “absolutely devoid of merit” character as
61 the basis for their dismissals.

62 Plaintiff has submitted sworn statements with each of the prior Complaints specifically
63 describing in detail the durable pattern of facts of his experience. Certain of the events and
64 circumstances of the Complaint have been independently verified by Defendant City of New
65 York Police Department (NYPD), confirming in part Plaintiff’s experience in the recent past.
66 Since these improperly pretexted events and circumstances involved counterterrorism
67 operations and were routinely conducted across state lines in multiple jurisdictions, there can
68 be no doubt of federal police powers involvement in these events.

69 That the pattern of facts is considered wholly fanciful by some is the result of both
70 misunderstandings of science and a misinterpretation of law. The standard was clearly
71 established by the Supreme Court in Denton v. Hernandez, 504 U.S. 25, 33 (1992), as described
72 in Justice O’Connor’s opinion:

73 *An in forma pauperis* complaint may not be dismissed, however, simply because the
74 court finds the plaintiff’s allegations unlikely. Some improbable allegations might
75 properly be disposed of on summary judgment, but to dismiss them as frivolous
76 without any factual development is to disregard the age-old insight that many
77 allegations might be “strange, but true; for truth is always strange, Stranger than

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78 fiction.” Lord Byron, Don Juan, canto XIV, stanza 101 (T. Steffan, E. Steffan, & W. Pratt
79 eds. 1977).

80 The Plaintiff strongly encourages the Court to consider the following logic and
81 reasoning, as well as this Complaint’s basic explanation of the science, medicine, and
82 technologies used to create and operate this system, rather than instantly and summarily
83 dismissing this Complaint as frivolous, irrational, devoid of facts, fanciful, incoherent, and so
84 forth.

85 A mode of transportation commonly used today by members of the bar, this Court, and
86 millions of others around the world would sound irrational, wholly fanciful, and even insane to
87 someone in St. Louis in 1850 hooking their oxen to a newly purchased Conestoga wagon for the
88 five month, fifteen mile per day journey to Mexican California. Consider the following opinion
89 of a stranger speaking to that oxcart driver:

90 “Someday, people will soar like a bird in a metal tube with bird-like wings. This
91 machine will be 230 feet long with bird wings 212 feet wide, nearly 100 times bigger
92 than your Conestoga wagon. The machine will be made of a metal discovered about 25
93 years ago, which will be mined and pressed into sheets like copper but is much lighter in
94 weight. 220,000 pounds of this metal will be used to use to shape this aerial machine. A
95 liquid fuel drawn from beneath the ground, much like the whale oil you use to light your
96 lamps will be used to power this machine. The liquid fuel, purified by methods not yet
97 conceived, will propel the machine horizontally through the skies, seven miles above the

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98 earth, using an engine which works much as a Chinese bottle rocket. You will be able to
99 reach Mexican California from St. Louis in less than 5 hours.”

100 Such an explanation would have been instantly dismissed as the babblings of the insane,
101 as frivolous, incoherent, and delusional, with no basis on fact and yet....

102 Here we are, 170 years after the oxcart driver left St. Louis on a perilous five to six
103 month journey to Mexican California. We carry \$300 smartphones which routinely outperform
104 \$30 million house-sized mainframe computers considered state-of-the-art 40 years ago; with
105 satellites broadcasting GPS precision location signals to guide Navy vessels and their aircraft
106 and missiles with sub-millimeter level precision, while providing streaming video services and
107 TV reruns of Andy Griffith; with one and two mile long concrete runways routinely used by
108 aircraft to hunt submarines or to fly 300 tourists 15 hours to Bali for vacation; with container
109 ships over one-quarter of a mile long and weighing 200 million pounds routinely used to bring
110 children's electronic toys from Asia; with high definition cameras using technology hundreds of
111 times better than 1990s spy satellite cameras, in our smartphones and personal computers. We
112 could go on endlessly with these comparisons of performance, cost, and capability.

113 That 5 or 6 month ox-drawn wagon journey from St. Louis to Mexican California in 1850
114 was cut to about 24 days by stagecoach in 1858, then to only 2.5 days by rail in 1886, just 35
115 years later. Men sat foot on the Moon less than 25 years after the first deployment of buzz
116 bombs used against London in World War II. Today, NASA is collaborating with private
117 companies to develop quiet supersonic aircraft to reduce our 5 hour commercial jet journey

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118 between St. Louis and Los Angeles to around 2 hours, just 118 years after the Wright Brother's
119 first powered flight.

120 The pace of technological change continues to accelerate. The power of technology has
121 grown at ever accelerating rates in computing, artificial intelligence, neural networking,
122 communications, remote sensing, precision location technologies, and medicine, among others.
123 The combined power of these technologies, from several quadrillion supercomputer operations
124 per second; to near zero latency in global communications; to computers, robots, and software
125 that learn from experience; when combined with rapid advances in neurophysiology
126 empowered by advances in computing and medical technologies such as magnetic resonance
127 imaging and transcranial (through the skull) brain stimulation can enable, for example, a
128 focused ultrasound system used today in some hospitals to mitigate or eliminate Parkinson's
129 tremors without the need to open the skull for surgery.

130 There were extremely powerful and persuasive rationales for the United States to
131 develop this intrusive mind altering technology to invade human autonomy. Used against
132 international adversaries, this technology can be extraordinarily useful. While it remained
133 undiscovered by targeted US adversaries, it could be used to manipulate decision makers and
134 influencers, making it more powerful than the entire US Pacific Fleet of carriers, cruisers, subs,
135 aircraft, and missiles. Strategic decisions of adversaries could be directly disrupted and
136 misdirected through this manipulation of human autonomy. It is likely this technology enjoyed
137 success for a time in this application.

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138 For this powerful and compelling set of strategic reasons, this system for invading
139 human autonomy was developed, enabled, and has continued to be updated by billions of
140 dollars of Congressional appropriations over decades. Black budgets of DOD, CIA, DHS, and DOJ,
141 have been used to enable, deploy, and improve succeeding generations of this technology. This
142 system was likely developed by private contractors who routinely operate in the national
143 security space, using ever more capable computing, then supercomputing, as well as our ever
144 advancing research and understanding of neuroscience and psychiatry.

145 The issue raised by this Complaint is not such use against adversaries by the United
146 States. Rather, the issue at hand is the malign use of this technology as illegally and
147 unconstitutionally weaponized against US persons.

148 The integrated application of these technologies to manipulate and invade the
149 autonomy of US persons including the Plaintiff is claimed by some, with a background in law,
150 but not in science, medicine, neurophysiology, or technology, to be “preposterous, frivolous,
151 unsubstantiated, fanciful, and delusional, devoid of factual basis.” That other Judges, with great
152 understanding of the law, but having neither relevant experience, nor scientific, technological,
153 or medical background, have evaluated the facts presented in preceding versions of this
154 Complaint, and reached a similar conclusion to the oxcart driver in St. Louis, should surprise no
155 one.

156 Their decisions to dismiss the Complaints were not based upon their reading and
157 knowledge of the law but upon their misunderstanding and lack of proper background and
158 experience to rationally and dispassionately evaluate the facts. The Court must consider the

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159 Plaintiff’s personal experience, and professional experience and qualifications (explored
160 elsewhere in this Complaint), as well as the independent verification by Defendant City of New
161 York Police Department of certain highly relevant facts presented in this Complaint, and the
162 Supreme Court Opinion written by Justice O’Connor in Denton v. Hernandez, 504 U.S. 25, 33
163 (1992):

164 *An in forma pauperis* complaint may not be dismissed, however, simply because the
165 court finds the plaintiff’s allegations unlikely. Some improbable allegations might
166 properly be disposed of on summary judgment, but **to dismiss them as frivolous**
167 **without any factual development is to disregard the age-old insight that many**
168 **allegations might be “strange, but true; for truth is always strange, Stranger than**
169 **fiction.”** Lord Byron, Don Juan, canto XIV, stanza 101 (T. Steffan, E. Steffan, & W.
170 Pratt eds. 1977).

171 The Plaintiff respectfully requests this Court to permit this case to proceed to additional
172 factual development in accordance with the Supreme Court’s opinion in Denton v Hernandez.

Plaintiff Brewer’s Statement Summarizing Coercive Technology Similar To And More Sophisticated Than Havana Syndrome Technology: Brain Remote Management Technology (BRMT)

1 Plaintiff’s knowledge of the system described herein as used by Defendants is based on
2 years of personal direct and specific experience as a subject thereof, and his professional
3 education, experience, and knowledge of technology. The United States has developed and
4 deployed technology similar to that used by its global adversaries to induce Havana Syndrome
5 symptoms in State and CIA employees. Plaintiff notes that the U. S. Secretary of Defense issued
6 a directive to all DOD military and civilian employees requiring them to report any symptoms of
7 Havana Syndrome three days after the filing of Plaintiff’s prior Complaint 21-cv-02424 and
8 about a week after Plaintiff’s informal contact with the CIA’s Public Information Office
9 regarding this technology.

10 The U.S. technology used by Defendants is significantly more sophisticated in form,
11 application, and use than the Havana Syndrome technologies. Plaintiff identifies this technology
12 by the name Brain Remote Management Technology, as summarized below.

13 **Brain Remote Management Technology Tools:**

- 14 • **Hardware:** Super-computer programmed with a familiar style of user interface for
15 human management of orchestrated operations, which can be sequenced and timed to
16 an internal clock or to cues from the subject’s environment. The supercomputer can
17 orchestrate this preprogrammed set of bio-interrupts including branching options, both
18 sequenced and randomized, and/or can respond to environmental cues by processing

Plaintiff Brewer’s Statement Summarizing Coercive Technology Similar To And More Sophisticated Than Havana Syndrome Technology: Brain Remote Management Technology (BRMT)

19 and reacting to a remote sensing feed using neural networking and/or artificial
20 intelligence.

21 Current supercomputers operated by DOD can process 3 quadrillion operations
22 per second, equal to about 30% of the brain’s processing power. A supercomputer with
23 the processing power of a human brain is being completed this year at Argonne National
24 Laboratory.

25 Similar to the technology creating Havana Syndrome, this system does not
26 replace all brain functions, but merely interrupts, delays, accelerates, magnifies, or
27 diminishes selected brain functions one to a few at a time. It is not necessary for the
28 hardware/software system to replicate all brain functions at all times. Breathing,
29 speech, or body movements, for example, can be momentarily disrupted with a few
30 commands, as the brain continues its normal processing of all other body functions
31 (muscle movement, speech, respiration, balance, heart rhythm, vision, smell, etc.)

32 • **Software:** BRMT has extremely complex software to provide the needed commands to
33 replace thought, action, speech, hearing, and vision of the subject with an alternate
34 non-autonomous reality/outcome. The complexity is similar to the complexity of a
35 global weather simulation model, which requires supercomputer processing power to
36 model billions to quadrillions of operations in microseconds. The vast resources
37 required to build such a complex system requires billions of dollars, operations managed

Plaintiff Brewer’s Statement Summarizing Coercive Technology Similar To And More Sophisticated Than Havana Syndrome Technology: Brain Remote Management Technology (BRMT)

38 by artificial intelligence and/or neural networks to operate on the millisecond level
39 required to generate this complex non-autonomous set of human speech, actions, etc.

40 Essentially this is a symphony of acts and sensations as conducted by the
41 supercomputer, managed by commands set through a user interface which accepts
42 those commands on a human level and timescale, to accomplish a specific set of
43 results/patterns of biochemical messages directing the subject to think and/or act in a
44 particular way at a particular period in time. Further, with advances in artificial
45 intelligence and a dataset of learned patterns, the software can essentially refine its
46 own operations on the subject over time.

- 47 • **Transmission to subject:** Nanometer range (invisible spectrum) signals are sent to
48 various brain locations to actuate or halt biochemical messages. The short wavelength
49 of nanometer signals allows them to easily penetrate concrete, dirt, rock, bone, etc., to
50 reach the subject’s brain. (A human hair is 80,000 to 100,000 nanometers in diameter.)
- 51 • **Augmented location accuracy:** Precision locating technology (locally placed or located)
52 is used to enhance the accuracy of a remotely located signal source. Prior generations of
53 this technology may have required a ground-based signal source. Today, available
54 location augmentation technology permits use of a space-based signal source with the
55 current generation of this system.

Plaintiff Brewer’s Statement Summarizing Coercive Technology Similar To And More Sophisticated Than Havana Syndrome Technology: Brain Remote Management Technology (BRMT)

56 For example, commercially available RTK augmentation technology for farming
57 currently provides sub 1 inch in one mile accuracy, that is, 1 inch in 63,360 inches. By
58 reference to a fixed point on the subject’s head, which can be easily provided with a
59 high-resolution local camera or a high resolution satellite image, it is possible to apply
60 this same level of precisely augmented location accuracy to a human head. This level of
61 augmented location precision as applied to the head is about 2/1,000ths of an inch, 5.08
62 microns.

63 • **MRI enhanced knowledge of subject’s fine brain structure:** A baseline MRI brain map of
64 the subject can be used to enhance location augmented satellite signals to pinpoint the
65 location of certain brain elements relative to a known fixed position on the subject while
66 the subject is in motion.

67 • **Normal Brain Pathways Are Used To Operate Brain Remote Management Technology**

68 The brain and a supercomputer work in similar though certainly not identical
69 fashion. Millions of simultaneous interactions occur to, for example, move your little
70 finger an inch or two. The physical movement is accomplished by transfer of biological
71 chemicals in brain cells on one side of a cellular boundary across a gap to other cells.
72 Vastly oversimplified, this biochemical transfer from a brain cell generates a signal in the
73 receiving nerve cell which in turn generates a biochemical message/set of commands
74 which travel, using routing instructions, through the central nervous system (similar to a

Plaintiff Brewer's Statement Summarizing Coercive Technology Similar To And More Sophisticated Than Havana Syndrome Technology: Brain Remote Management Technology (BRMT)

75 network of cables) to specific muscle receptors in the little finger. The muscle receptor
76 tells the muscle or muscles to contract a certain distance at the desired speed to
77 complete the desired movement.

78 **Body/Mind Manifestations of Biochemical Disruptions of Normal Brain Activity Using BRMT:**

- 79 • Disturbances of normal body rhythms and processes, including balance, muscle
80 responses, thoughts, blanking of thoughts, sleep rhythms, vision, hearing.
- 81 • Disturbed or induced thoughts and/or movement patterns, such as, for example, prior
82 to a planned motion to change that motion; during the thought process to erase/block a
83 thought or instill a thought; to activate the central nervous system to paralyze or
84 enhance body rhythms, activities, or movements, to send pain signals and other
85 messages to the brain.
- 86 • Inducing excess or deficient production of biochemicals, to cause brain chemical
87 imbalances which produce mental illness symptoms, such as depression or
88 schizophrenia.

89

90 I declare under penalty of perjury under the laws of the United States of America that
91 the foregoing is true and correct. Executed on October 30, 2021.

92



**PLAINTIFF BREWER’S STATEMENT OF PERSONAL BACKGROUND AND PRIOR INTERACTIONS
WITH GOVERNMENT AND LAW ENFORCEMENT**

1 Plaintiff offers the following statement describing Plaintiff’s character and past
2 practices.

3 **Volunteer Efforts And Interactions With Government in Washington State**

4 Plaintiff volunteered with AeA, a high technology trade association (now known as
5 TechAmerica) in the early 2000s. While serving as Chair of a Higher Education Task Force and
6 during a subsequent term as regional Chair and on the National Board, Plaintiff was requested
7 by Sue Crystal, the Washington Governor’s Chief of Staff, to assume the Chair position of the
8 Higher Education Coordinating Board. This state agency oversees all colleges and universities in
9 the State of Washington. Another member of the Higher Education Task Force was, at the
10 suggestion of Plaintiff, named to the Community College Board for the State. As part of
11 Plaintiff’s volunteer efforts, he became acquainted with most of the leadership then in the
12 State House and Senate and served on the AeA Committee which developed position papers for
13 the industry and raised and allocated PAC funds.

14 Plaintiff spoke at various Governor’s Summits and gatherings throughout the State.
15 Plaintiff was known to, had discussions with, and spoke at events with former Washington
16 Governors Evans and Gardner, and with members of the US House of Representatives from
17 Washington at that time, including Adam Smith, Jennifer Dunn, Jay Inslee, and, to a limited
18 degree, Kathy Nelson. Further, Plaintiff and Washington Governor Gregoire’s Chief of Staff
19 became acquainted when Plaintiff was 19 years old and a friend of the family. While none of
20 this speaks to Plaintiff’s current and on-going conduct, the Court may be requested to call these

**PLAINTIFF BREWER'S STATEMENT OF PERSONAL BACKGROUND AND PRIOR INTERACTIONS
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21 people as witnesses, as well as members of the law enforcement community, including local
22 counter-terrorism officials in the States of New York and New Jersey, to testify as to the on-
23 going conduct of the Plaintiff during their investigation of Plaintiff. As to the continued behavior
24 of the United States, its illegal and unconstitutional conduct continues as this phrase is being
25 typed at 10:11 P.M. on this twenty-ninth day of October 2021.

26 **EDUCATIONAL BACKGROUND**

27 Plaintiff holds a Bachelor of Arts degree in Business Administration and a Master of
28 Business Administration degree, both from Washington State University. Plaintiff, with minimal
29 college credit hours of accounting, passed the examination to become a Certified Public
30 Accountant and was previously licensed in the State of Washington. Plaintiff also holds a single
31 engine private pilot's license issued by the Federal Aviation Administration.

32 Plaintiff's encounters with law enforcement have never, at any time, under any
33 circumstances, resulted in any act of violence against any person, place, or thing, be it on
34 private or public property. Plaintiff has never been notified of any accusation of any criminal act
35 by any person. Plaintiff's conduct has been imperfect as follows: speeding violations in the
36 states of Washington and Oregon prior to the age of 35; the improper removal of granite rocks
37 worth approximately \$20 to \$30 from the Snoqualmie National Forest in the early 2000s;
38 approximately \$2,000 of unpaid federal income taxes, subsequently collected as result of an IRS
39 audit, in conjunction with the divorce settlement of his first marriage to the then former wife of

**PLAINTIFF BREWER'S STATEMENT OF PERSONAL BACKGROUND AND PRIOR INTERACTIONS
WITH GOVERNMENT AND LAW ENFORCEMENT**

40 a King County Police officer who ran a serial killer investigation and a police precinct; unpaid
41 employment taxes and worker's compensation premiums in conjunction with a business failure.

42 The business failure resulted from the State of Utah's seizure of the insurance company
43 providing bonding to Plaintiff's company, in combination with post-acquisition refusal of the
44 Small Business Administration, likely at the behest of the Federal Bureau of Investigation, to
45 continue the bonding it had provided to the company's prior owners up until the moment it
46 was acquired by the Plaintiff and a minority investor.

47 The Small Business Administration, assuming it was their employee and not a Federal
48 Bureau of Investigation field agent, never provided any reason for the denial of the previously
49 available bid and performance bonding, which is absolutely essential to the successful
50 operation of any contractor. Bonding is essential to companies involved in government
51 contracting, which comprised the vast majority of the firm's work and revenues. This inability to
52 bond its bid and subcontract award cost the firm, for example, asbestos abatement work on a
53 federal modernization contract at the FAA Air Traffic Control Center in Auburn, Washington
54 worth over \$1 million in the early 1990s, about \$1.9 million in today's dollars.

55 The prime contractor on that project had previously worked with the Plaintiff's firm at
56 Snoqualmie High School in Snoqualmie, Washington and said they were very pleased with the
57 firm's work while managed and partially owned by Plaintiff. Plaintiff believes this was directly
58 related to the Federal Bureau of Investigation and the United States' pattern of bias and
59 misconduct against the Plaintiff. This business failure also resulted in the need for the Plaintiff

**PLAINTIFF BREWER'S STATEMENT OF PERSONAL BACKGROUND AND PRIOR INTERACTIONS
WITH GOVERNMENT AND LAW ENFORCEMENT**

60 to declare Chapter 7 bankruptcy in 1993. This, in turn, caused Plaintiff to decline Washington
61 Governor Locke's invitation to Chair the Higher Education Coordinating Board, the nine
62 member Board of a State of Washington cabinet level agency, whose Board then counted
63 among its members a Costco founder and the sister of a founder of Microsoft.

64 **ABSENCE OF VIOLENT HISTORY**

65 Plaintiff's entire history of violence while engaged with any other person can be
66 summarized as follows:

- 67 • One punch fight on school bus early in seventh grade. Plaintiff received the punch and
68 the black eye at the age of 12.
- 69 • Slapped brother at kitchen table at the age of 19.
- 70 • Plaintiff's schizophrenic stepson attempted an attack on Plaintiff in the early 2000s.
71 Plaintiff pushed him away. Stepson stumbled and fell toward the raised mantle of the
72 fireplace. On stepson's second advance, concerned for his stepson's safety, Plaintiff
73 steered stepson to land on an overstuffed couch and walked away. Stepson later had to
74 be removed from the residence due to two choking attempts against Plaintiff's wife,
75 stepson's mother.
- 76 • Plaintiff's soon-to-be second ex-wife tapped Plaintiff on the left jaw with a punch at the
77 front door of Plaintiff's residence after she had moved out. As required by Washington
78 state law at the time, Plaintiff retreated toward an empty room in the house. The next

**PLAINTIFF BREWER'S STATEMENT OF PERSONAL BACKGROUND AND PRIOR INTERACTIONS
WITH GOVERNMENT AND LAW ENFORCEMENT**

79 thing Plaintiff noted was pressure to open the door, followed by the pointed heel of a
80 shoe coming through the door panel. Wife left premises and the episode ended.

81 **PLAINTIFF'S CURRENT MENTAL STATE AND CAPACITY**

82 Plaintiff experienced extreme duress and mental anguish over many years due to the
83 extensive and corruptly contrived police powers, intelligence, and counter-terrorism operations
84 driven by Defendants. These operations caused Plaintiff's suicide ideations in 2005 and 2010.
85 Both times Plaintiff voluntarily sought assistance while under extreme duress. The second such
86 ideation episode in 2010 was a few months prior to Plaintiff's hospitalization. Then, during the
87 first day of a second episode of homelessness, after being removed from his apartment by
88 Landlord's notice, Plaintiff called the White House to declare a national security emergency,
89 whereupon the operator placed him in voice mail. Plaintiff hung up and called 911 dispatcher
90 for assistance. Involuntary commitment based upon a flawed schizophrenia diagnosis resulted
91 in six months of hospitalized psychiatric care. Plaintiff lived in a locked psychiatric ward, was
92 mistakenly medicated for schizophrenia for months, eventually was able to request the same
93 anti-depressant medication he had used previously, and was able to leave the hospital and
94 function independently.

95 Plaintiff continues that medication to this day, though due to the ongoing medical
96 manipulations it is unclear if Plaintiff would require this medication at all if the on-going
97 manipulations by Defendants ceased. Plaintiff is of sound mind, lives completely independently
98 on very limited income, and has no significant financial assets as a result of Defendants' on-

**PLAINTIFF BREWER'S STATEMENT OF PERSONAL BACKGROUND AND PRIOR INTERACTIONS
WITH GOVERNMENT AND LAW ENFORCEMENT**

99 going misconduct which persists as this document is being edited at 10:28 PM, October 29,
100 2021.

101 Plaintiff has made systematic efforts over the past year to eliminate any potential
102 internal medical causes for his current health, wellness, and emotional stability. Despite on-
103 going manipulations by Defendants, Plaintiff has received head and torso imaging, care of a
104 cardiologist, a gut bioassay, and a variety of other medical tests. None of these tests provide
105 any significant indication of any internal medical condition which would create the brain
106 biochemistry required for delusional thinking. Plaintiff continues to take the same dose of anti-
107 depressant medication as he has since 2010. Plaintiff continues to experiences pain and
108 discomfort in public and private settings each and every day as a result of Defendants' acts.

109 **SYSTEMATIC DENIAL OF RIGHTS UNDER THE CONSTITUTION AND LAWS**

110 Plaintiff's first ex-wife's prior husband was the King County Police Task Force
111 Commander in the hunt for the Green River Killer in western Washington State. This serial killer
112 worked quietly in a local truck manufacturing plant while under investigation, until the day of
113 his arrest. He confessed and was convicted based upon evidence and his own statements.
114 Under the law, Plaintiff has been and is entitled to this same presumption of innocence as this
115 serial killer. Defendants have deprived the Plaintiff of these same human, Constitutional, and
116 civil rights the Constitution and the laws provide as a matter of right to suspected serial killers
117 prior to charge and conviction.

**PLAINTIFF BREWER'S STATEMENT OF PERSONAL BACKGROUND AND PRIOR INTERACTIONS
WITH GOVERNMENT AND LAW ENFORCEMENT**

118 I declare under penalty of perjury under the laws of the United States of America that
119 the foregoing is true and correct. Executed on October 30, 2021.

120

A handwritten signature in black ink that reads "Dennis J. Brewer". The signature is written in a cursive style with a large initial "D".

Plaintiff Dennis Brewer's Statement on Basic Facts of the Defendant's Direct and Indirect
Violations of Human, Constitutional, and Civil Rights

1 The Defendants, in a corrupt operation likely initiated by Defendant FBI sometime early
2 in the Plaintiff's lifetime and business career, designated the Plaintiff for treatment as a
3 national security experiment, a national security threat, and then as a terror threat. Using
4 corruptly derived, improperly pretexted, and illicit national security and counter-terrorism
5 operations, combined with the witting or unwitting collaboration of state and local law
6 enforcement, Defendants have used terrorizing tactics and technologies, police powers
7 operations, and actively provided disinformation to other law enforcement agencies, to seek a
8 desired outcome against the Plaintiff and cover up its own durable pattern of victimization. This
9 corrupt effort by Defendants was a durable, and very concerted effort to harm, imprison, or
10 possibly indirectly cause the death of the Plaintiff by any means necessary, while abusing its
11 authority, and vastly exceeding its Constitutional and statutory limits.

12 These operations have been conducted extra-legally using many of the same corrupt
13 and illegal operational techniques and methods documented in Cointelpro operations of
14 Defendant FBI from 1956 to 1971, and in comparable domestic and international operations of
15 CIA. These techniques and methods were documented by the Church Committee (the United
16 States Senate Select Committee to Study Governmental Operations with Respect to Intelligence
17 Activities) in 1975. The illegal Cointelpro operations were uncovered by an activist burglary of
18 an FBI field office, not by voluntary disclosures by Defendant DOJ or Defendant FBI.

19 Defendants have combined these same tactics and operations with technology hidden
20 from the other law enforcement agencies involved in the "investigatory" process, and cloaked
21 by national security classification, to engage in both physical and psychological manipulation of

Plaintiff Dennis Brewer's Statement on Basic Facts of the Defendant's Direct and Indirect
Violations of Human, Constitutional, and Civil Rights

22 Plaintiff. These tactics range from loss of consciousness for brief to extended periods of time; to
23 sleep inducement; to body movements and the paralysis of body movements; all as
24 commanded through the central nervous system but not by the Plaintiff exercising free will.

25 Without doubt, these claims will seem bizarre and highly improbable to the Court. The
26 Plaintiff respectfully requests the Court's indulgence as you allow development of the pattern
27 of corroborating facts through the discovery process and examine the claims in these
28 statements which accompany Plaintiff's Complaint and Request for Emergency Injunctive Relief.

29 The Plaintiff was shown technology in 2007 which the United States then claimed did
30 not exist. An early version of hypersonic technology which provided a very distinctive toroidal
31 (vertical donut shape) exhaust pattern unlike any other known propulsion system used in the
32 Earth's atmosphere. This technology is, in 2021, being brought out of its classified space into
33 the public domain. The analog to this is stealth technology which officially did not exist, though
34 it was repeatedly seen and reported by airline pilots and was used by the Air Force in offensive
35 operations years before its existence was officially confirmed.

36 The technology used against the Plaintiff has similarly been deeply classified and used
37 by Defendants against foreign adversaries. Defendants have misused this technology, explained
38 elsewhere in the documents filed in this Complaint, against US and other persons, to abuse and
39 manipulate Plaintiff and, most likely, other subjects, over the past four decades.

40 **INVOLUNTARY MANIPULATIONS OF PLAINTIFF BY DEFENDANT'S TECHNOLOGY AND**
41 **OPERATIONS**

Plaintiff Dennis Brewer's Statement on Basic Facts of the Defendant's Direct and Indirect Violations of Human, Constitutional, and Civil Rights

42 These remotely commanded body movements, as well as speech and thought
43 manipulations, have terrified, and humiliated the Plaintiff over many years, as each succeeding
44 generation of this technology has become more sophisticated. The unlawful intent of
45 Defendants has placed the Plaintiff in frightening and terrifying circumstances and provided the
46 opportunity for the Plaintiff to be injured or killed by other police agencies' officers, uniformed
47 or non-uniformed, acting upon a misinterpreted body movement or sequence of body
48 movements commanded outside the free will of the Plaintiff by Defendants. It has also placed
49 Plaintiff at risk of injury or loss of life at the hands of a member of the general public acting
50 outside the law.

51 Defendants' actions have pressured and manipulated Plaintiff directly to two episodes
52 of suicidal ideation, one in 2005 and one in 2010, and to involuntary confinement in a mental
53 institution, among other things summarized below. Since this misconduct is part of a pattern of
54 Defendants' conduct which spans more than 30 years, no effort has been made here to provide
55 an exhaustive list of the hundreds of thousands of individual acts undertaken against the
56 Plaintiff, nor can Plaintiff specifically define the agency or officer who conducted such
57 undercover operations and manipulations, whether lawful or otherwise.

58 **Summary of central nervous system disruptions and distortions:**

- 59 • Headaches, floating visual distortions
- 60 • Visual cloaking and imaging
- 61 • Body pain inducement – arms, legs, torso, head

Plaintiff Dennis Brewer's Statement on Basic Facts of the Defendant's Direct and Indirect Violations of Human, Constitutional, and Civil Rights

- 62 • Twitches, tremors, yawns, coughs, itches, grip/grasp, loss of balance inducing collisions
- 63 with walls, door frames, people, objects
- 64 • Thought disruption, distraction, erasure, recall, induced sleep periods
- 65 • Body rhythms – heart rate, breathing rate, walking rate
- 66 • Organ function disruption – bowel movements, leg pains behind knee, sexual organs,
- 67 hand movements, jaw drops
- 68 • Induced obsessions – sexual, eating, aircraft doors inflight, attraction to inappropriate
- 69 targets, in an effort to induce misconduct, such as, for example, child sexual abuse
- 70 • Induced speech and thought disturbances – phrases, sentences, distortion of concepts,
- 71 ideas
- 72 • Induced mental illness from stress, brain distortions/chemical imbalances, and
- 73 deprivation/blocking of medical intervention, symptoms typical of schizophrenia
- 74 • Induced extreme eye watering, for example, while driving in southern California from
- 75 Pico Rivera to Los Angeles International Airport, endangering Plaintiff and others while
- 76 operating a motor vehicle on an Interstate freeway

77 **Summary of external operations inducing stress and endangering Plaintiff's life and well-**
78 **being:**

- 79 • Undercover police operations – frustration induced by continuous street level
- 80 disruptions, blocking, traffic accidents, sequential serial speech blocks similar to those
- 81 used to communicate during espionage operations, fire calls, public transportation
- 82 schedule misinformation, honey traps, blocking contacts online, fake phone calls with

Plaintiff Dennis Brewer's Statement on Basic Facts of the Defendant's Direct and Indirect
Violations of Human, Constitutional, and Civil Rights

83 disparaging comments about family members or from fake family members, frequent
84 reverses of visual messages.

85 • Faking voting rights rally on National Mall, August 28, 2021, interfering with Plaintiff's
86 First Amendment Rights to freely associate and peaceably assemble.

87 • Disinformation, misinformation, blocking and/or censoring of news sources, such as a
88 complete lack of coverage of nationwide voting rights rallies in The New York Times on
89 the following day (August 29, 2021).

90 • Violence inducement attempts - deliberately blown covers by nearby undercover agents
91 making themselves plainly obvious with non-verbal signals and/or deliberately
92 disparaging personal remarks, while engaging in, for example, pain inducement in
93 Plaintiff's body through technology, such as at the Mets game, Citi Field, New York City,
94 on August 14, 2021.

95 • Fake sales calls to starve Plaintiff's companies of revenue and cash flow, starving out
96 Plaintiff and forcing asset liquidations, including home, auto, and financial assets, and
97 also to force tax traps, such as Plaintiff's life insurance cash value liquidation upon
98 Plaintiff's inability to pay premiums due to Defendants' actions.

99 • Fake employment and fake projects, employment force-out with investment
100 requirement at Establish Inc, Fort Lee, NJ in July 2008.

101 • Sirens and pistol holster flap movement by FBI Police at FBI headquarters as part of
102 Defendants' overall intimidation during Plaintiff's visit to deliver a complaint letter in
103 accordance with Plaintiff's First Amendment Right of Petition in late Summer 2005.

Plaintiff Dennis Brewer's Statement on Basic Facts of the Defendant's Direct and Indirect
Violations of Human, Constitutional, and Civil Rights

- 104 • Computer software hacks providing varying results to Plaintiff's consistent inputs during
105 applications and internet access; computer crashes, freezes, and delays; fake websites
106 with misinformation and disinformation from the early 2000s into the present day.
- 107 • Public transit disruptions, including flipped schedules from the time of Plaintiff's arrival
108 in New Jersey until recent days when this practice was ended.
- 109 • Denial, over many years, to full, fair, and free access to employment, and to the ability
110 to commercialize innovations, processes, develop technologies, and access to financial
111 markets for the purpose of so doing.

112 **HISTORY AND EXAMPLES OF POLICE POWERS OPERATIONS AGAINST PLAINTIFF**

113 • **OPERATIONS AGAINST PLAINTIFF AND PLAINTIFF'S FAMILY**

114 Plaintiff's parents and grandparents belonged to a religious group which serves
115 in the military services as conscientious objectors due to their religious beliefs. Plaintiff's
116 grandfather related the story of his home-based church group being observed by agents
117 of the Federal Bureau of Investigation as they conducted a home-based church service
118 sometime before Plaintiff was born. Plaintiff is unable to determine if a viable
119 connection exists but is extremely concerned about a possible perpetuated pattern of
120 designer outcomes, including illegal surveillance in violation of the First Amendment
121 against this religious community and others across multiple generations. Cointelpro,
122 including illegal spying and surveillance of religious and activist groups, was run by
123 Defendant FBI from 1956 to 1971.

Plaintiff Dennis Brewer's Statement on Basic Facts of the Defendant's Direct and Indirect Violations of Human, Constitutional, and Civil Rights

- 124 • Plaintiff also experienced significant abnormal and unusual behaviors by agents of
125 Defendants dating as far back as age 17 (1972). On a routine excursion in the
126 Greenwater, Washington area of the Snoqualmie National Forest, Plaintiff and his
127 cousin picked up a very well-dressed hitchhiker from the roadside. There was no
128 apparent means of transportation that would account for the individual's presence
129 along State Highway 410 in that area, more than a dozen miles from Greenwater, the
130 nearest small mountain community. Plaintiff and Plaintiff's cousin shared Plaintiff's 1955
131 Ford Pickup with this unidentified individual to the Greenwater Tavern. About 10 to 15
132 minutes after leaving the unidentified man at this location, Plaintiff noticed this
133 hitchhiker had left a tan briefcase in the pickup bed. Plaintiff opened the briefcase and
134 found the entire contents of the brief case were a telephone handset and dial pad. This
135 was about the time the first cell phones were said to have been invented, and none
136 were then available to or generally known by the public. Plaintiff drove the briefcase
137 back to the Greenwater Tavern, located the unidentified man and returned the
138 briefcase, which was accepted with no comment and little emotion. Based upon the
139 Plaintiff's subsequent experiences, Plaintiff has reason to believe this was an undercover
140 agent of Defendant FBI.
- 141 • Plaintiff joined the Seattle office of Deloitte, Haskins, and Sells, a national accounting
142 and consulting firm in August 1979, after receiving his MBA. During this time, the Seattle
143 office was engaged in developing the national ATM network for South Africa's banking
144 system, installing a government ERP system in Palau as it transitioned from a trust

Plaintiff Dennis Brewer's Statement on Basic Facts of the Defendant's Direct and Indirect
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145 territory, and providing ERP system services to Saudia Airlines in Saudi Arabia. On
146 knowledge and belief, these projects had a dual purpose - to serve the client's needs
147 and to provide intelligence windows into the on-going operations of these entities and
148 movements of Saudi government employees and others. A familiar pattern emerged
149 and continued into recent years, where newly hired consultants would spend a few
150 months building an employment record in the US, then move on to international
151 projects, eventually returning for a few months to their US office, before resigning from
152 their ostensible employer. This pattern continued into Plaintiff's various employment
153 stints which lasted until 2008.

154 • Two incidents of manipulation stand out in the 1980s. Plaintiff, a pilot, rock climber,
155 whitewater canoeist, and informal rafting guide, found himself crying at the sight of an
156 antique fire engine during a small community Fourth of July celebration, a truly bizarre
157 occurrence for a person with Plaintiff's high level of emotional intelligence and stability.
158 On a return trip from Whistler, British Columbia, Plaintiff became extraordinarily tired in
159 the early afternoon while driving along the then unguarded sea cliffs hundreds of feet
160 above Howe Sound south of Squamish, British Columbia. Plaintiff was about 30 years old
161 at the time and in excellent health. There is no apparent alternate explanation for this
162 episode of extreme tiredness. On knowledge and belief, Plaintiff further believes it is
163 likely this technology was used against his then wife to facilitate the breakup of
164 Plaintiff's marriage. This can only be firmly established through a rigorous discovery
165 process.

Plaintiff Dennis Brewer's Statement on Basic Facts of the Defendant's Direct and Indirect Violations of Human, Constitutional, and Civil Rights

166 • In 1990, Plaintiff purchased a small environmental services business in Auburn,
167 Washington. Prior to the purchase, Plaintiff sought out the Small Business
168 Administration to assure himself of the availability of vital government bonding
169 guarantees. Immediately after the purchase, the Small Business Administration,
170 assuming it was their employee and not a Federal Bureau of Investigation field agent,
171 denied the newly acquired company the bid and performance bonding it had previously
172 provided the company. SBA, or whoever it was, never provided any reason for the
173 denial of the previously available bid and performance bonding. Bonding is essential to
174 companies involved in government contracting, which comprised the vast majority of
175 the firm's work and revenues.

176 This inability to bond its bid and subcontract award cost the firm, for example,
177 asbestos abatement work on a federal modernization contract at the FAA Air Traffic
178 Control Center in Auburn, Washington worth over \$1 million in the early 1990s, about
179 \$1.9 million in today's dollars. The prime contractor on that project had previously
180 worked with the Plaintiff's firm at Snoqualmie High School in Snoqualmie, Washington
181 and said they were very pleased with the firm's work while managed and partially
182 owned by Plaintiff.

183 During this period, two agents of Defendants approached the Plaintiff about
184 their prior and on-going mechanical systems project work at a classified site in northern
185 Nevada which does not officially exist, despite being clearly visible on satellite photos.

Plaintiff Dennis Brewer's Statement on Basic Facts of the Defendant's Direct and Indirect Violations of Human, Constitutional, and Civil Rights

186 Plaintiff believes these actions were directly related to the Defendants ongoing
187 pattern of bias and misconduct against the Plaintiff. This business failure also resulted in
188 the need for the Plaintiff to declare personal Chapter 7 bankruptcy in late 1993.

189 • Plaintiff suffered a life threatening episode of deep vein thrombosis (DVT) in 1994. For
190 many years after this event, Defendants manipulated symptoms of this life-threatening
191 medical condition hundreds of times to create fear in Plaintiff's mind of a repeat
192 episode. The DVT resulted from a cover operation in London, United Kingdom, related
193 to yet an episode of failed funding by Credit Lyonnaise Laing, for P.A.N. Environmental
194 Services, an SEC reporting pink-sheet company based in Seattle, Washington.

195 • Plaintiff joined Pacific Pipeline, Kent, Washington, in 1994 as a Board member and, a
196 few months later, as its Chief Operating Officer. Pacific Pipeline sold books and other
197 media to Barnes and Noble and Costco throughout the United States, and to
198 independent booksellers in the Pacific Northwest. A disastrous ERP implementation was
199 undertaken, and Plaintiff and other management team members undertook a rescue
200 operation.

201 • In November 1995, Plaintiff joined CNA Industrial Engineering (CNA), Bellevue,
202 Washington. Plaintiff was pulled into CNA by agents of Defendants, who left shortly
203 after his arrival. Defendants subsequently and purposefully exposed Plaintiff to
204 numerous national security environments. These technologies included the Delta IV
205 rocket technology for the Air Force; satellite failures related to launches on behalf of
206 various DOD operations, likely NSA or NRO by Hughes; sensitive operations, involving

Plaintiff Dennis Brewer's Statement on Basic Facts of the Defendant's Direct and Indirect Violations of Human, Constitutional, and Civil Rights

207 nuclear submarines at Puget Sound Naval Shipyard; and nuclear technology including
208 civilian power plants and military applications non-destructive testing of reactor vessels
209 and piping, provided nationally and internationally by Zetec, Issaquah, Washington.

210 • **APPARENT PRETEXT FOR ESCALATION TO A "TERRORISM" INVESTIGATION BY THE**
211 **UNITED STATES**

212 • Shortly after 9/11/2001, Plaintiff began having discussions about this tragedy with
213 strangers soliciting opinions of the Plaintiff. In one such interview with a stranger,
214 Plaintiff expressed the view that this was a terrible tragedy, but so are many other
215 events that occur each day in the United States and throughout the world. For example,
216 as related by Plaintiff, approximately 3,000 people die in car accidents each month in
217 the United States.

218 • Plaintiff believes these interviews were used as part of a pre-text for "investigatory"
219 operations against the Plaintiff as part of an overall escalation of systematized abuse by
220 Defendants. This enabled Defendants to aggressively expand the use of classified
221 technology against "terror suspects" inside the United States. This was done against
222 Plaintiff, and likely against other disfavored persons, in an egregious and aggressive
223 manner.

224 • Plaintiff left CNA in August 2002 and thereafter engaged Technology Sales Leads,
225 Boston, Massachusetts to develop sales leads for his new company, Performa, Bellevue,
226 Washington. Plaintiff is unable to retrace each sales visit specifically absent further
227 discovery, but is certain Defendants played a role in scheduling and conducting each of

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228 these time-wasting and expensive "sales" calls in various states with the intent of
229 depriving Plaintiff of a livelihood through independent employment by starving his small
230 company, Performa, of revenue and cash flow from 2002 until its demise in 2005. All
231 these fake "sales" leads were developed through a small sales leads company in Boston,
232 known as Technology Sales Leads (TSL), likely a Boston Field Office operation of
233 Defendant FBI. TSL, basically a small boiler room operation with about 5 people in
234 downtown Boston, had extraordinary success in setting these meetings in a very short
235 period of time. None of the fake sales calls led to any projects, in contrast to the
236 Plaintiff's history at CNA of a 60% to 80% sales success rate for similar projects. This lack
237 of success was the precursor to the planned starve-out operation conducted by
238 Defendants.

239 • This systematic campaign destroyed the Plaintiff, causing the loss of family relationships,
240 including his 15 year marriage, legitimate business opportunities, reputation, personal
241 residence and virtually all real, personal, and financial assets, during the last months of
242 his 50 year residency in Washington state. As the Defendants starve-out operation
243 succeeded, Plaintiff liquidated assets during the latter half of 2005 in conjunction with a
244 stress-induced divorce from his second wife. As financial assets were depleted, Plaintiff
245 moved to an apartment, and in December 2005 left the Seattle, Washington area for
246 Boston, Massachusetts. This abrupt move was part of his effort to avoid involving family
247 members and friends in any further corrupt actions by Defendants, who were using any
248 means possible to criminally reach the Plaintiff.

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- 249 • Plaintiff resided in a Boston area hotel for four months, became homeless in Spring
250 2006, and was relocated to Pine Street Inn, a Boston homeless shelter for 17 months,
251 until August 2007. Plaintiff was then, for all intents and purposes transferred without
252 visible shackles, to northern New Jersey.
- 253 • Plaintiff was offered employment in August 2007 at Establish, Inc., Fort Lee, New Jersey.
254 Defendants operating this employer planned this outcome in advance of "hiring" the
255 Plaintiff to move Plaintiff from the Boston homeless shelter he lived in for 17 months to
256 the greater New York City metro area. While there, Plaintiff engaged in a number of
257 undercover operations masquerading as consulting projects, including a sales and
258 operations planning software selection project at PPG in Pittsburgh, Pennsylvania for
259 the Paint and Coatings Division, and a project to assess SAP implementation readiness
260 for Clipper Windpower in Carpinteria, CA and Cedar Rapids, Iowa. As before, the small
261 company's North American leader and senior executive, who had hired Plaintiff,
262 departed shortly after Plaintiff joined the company.

263 These and other projects in which Plaintiff participated while at Establish Inc,
264 had some unusual similarities to other prior experiences of Plaintiff. While the Clipper
265 Windpower corporate office in Carpinteria was full of people, none of the plants Plaintiff
266 visited for these client companies was in operation at the time of Plaintiff's site visit.
267 Plaintiff was terminated from his employment a few weeks after declining to invest
268 \$25,000 he did not have into the Company. The July 2008 termination was a violation of
269 fair employment practices under state and federal law as the investment was a

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270 condition of Plaintiff's continued employment. An extended period of unemployment
271 from August 2008 resulted in a complete mental breakdown in the absence of
272 previously sought medical care,

273 • In 2010, shortly after filing a federal lawsuit on June 23, 2010, in the US District Court for
274 the District of New Jersey, Plaintiff was forced from his residence into homelessness as a
275 result of the inability to earn an income and exhaustion of unemployment. This second
276 brief episode of homelessness led to Plaintiff's involuntary commitment to a psychiatric
277 hospital in Bergen County, New Jersey, which ultimately lasted from October 1, 2010 to
278 April 30, 2011. Upon release from the psychiatric hospital, Plaintiff was housed by a
279 private New Jersey social service agency until late 2018.

280 • After Plaintiff's 2011 psychiatric hospital release, Plaintiff was interviewed by a
281 psychiatrist and was determined not to qualify for an approximately \$2,200 Social
282 Security Disability stipend which would have allowed him to reside elsewhere than the
283 place assigned by Defendants. Plaintiff notes that he was placed there, absent shackles
284 or any charges of any kind, for the convenience of Defendants. During this time, Plaintiff
285 could not find or was not permitted to engage in meaningful employment using his
286 knowledge, experience, and advanced degree, and was forced to subsist on a welfare
287 grant for five years until that expired. Plaintiff also used government food stamps and,
288 after the welfare grant expired, a local food bank to subsist.

289 • Plaintiff formed yet another company in 2011 to pursue his vocational interest in
290 agriculture. From 2015 into recent times, projects which Plaintiff's companies

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291 attempted to engage in were again part of a systematic pattern of deception intended
292 to deprive Plaintiff of the contracts, sales, and cash flow required to found and operate
293 a successful private enterprise.

294 • As discussed, Defendants had previously used this tactic when the Plaintiff resided in
295 Washington state. In a repeat of this illegal operation while Plaintiff has resided in New
296 Jersey, Plaintiff's company engaged the services of a Wall Street firm to raise financing
297 and attempted to negotiate a contract with Walmart. An initial meeting relating to
298 organic produce was held at Walmart headquarters in Bentonville, Arkansas. This
299 contract did not materialize.

300 • In June 2017, China lifted its embargo on US beef supplies. Plaintiff contacted Walmart
301 headquarters and engaged in discussions and negotiations with personnel allegedly
302 representing Walmart China. Contract execution and implementation were delayed for
303 many months, supposedly by a serial sequence of on-boarding events normally
304 conducted in parallel. A contract with Walmart China was finally signed in early 2018.

305 Plaintiff now believes this is another fraud perpetrated by Defendants. This
306 follow-up project was completed entirely with phone calls and emails, except for a visit
307 to a residence in the Bentonville area at the request of the purported Walmart
308 employee. A vendor, now believed to a second undercover officer, was present,
309 ostensibly installing a floor for a party later that evening for the Walmart China
310 personnel involved in negotiations with our company, who were allegedly visiting the
311 Bentonville, Arkansas headquarters at that time.

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312 This was a completely fabricated series of events. Shortly after the China
313 contract was finally executed in early 2018, then President Trump declared a trade war
314 with China which effectively terminated the Walmart China contract as tariffs made
315 execution impossible. Defendants arranged this fabricated contract and arranged for the
316 "execution" of the contract with the foreknowledge that events would transpire as they
317 eventually did, once again depriving Plaintiff's companies of needed revenue and cash
318 flow to sustain a successful private commercial business. Plaintiff also spent more than
319 10% of his limited monthly Social Security income for several years to establish and fund
320 this private business.

321 More recent Defendants' misconduct has involved continued blocking of
322 Plaintiff's business and social relationships, use of biomanipulation described elsewhere
323 in the Complaint as well as continued deprivation of various human, Constitutional, and
324 civil rights. These actions must be the subject of expanded discovery under the direction
325 of this Court. As discussed, these extra-legal activities very probably pre-date the
326 reforms to United States law made in 1975-76 as a result of an activist burglary of an FBI
327 field office, and discovery of the 15 year Cointelpro campaign of Defendants'
328 misconduct, including Constitutional, Criminal, and civil violations, by Defendant FBI,
329 and other agencies of the United States, including the CIA, the predecessor to NSA, and
330 other intelligence agencies.

331 These violations continue into the present time. Two very recent examples are
332 discussed below.

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333 • Voting Rights March in Washington, D.C. on August 28, 2021 – Plaintiff was misdirected
334 to an alternate site adjacent to the National Archives instead of the announced event at
335 the Lincoln Memorial. Prior to the event, Plaintiff was deliberately misled by information
336 posted online. The alternate event, with no speakers, featured less than 500 people
337 marching and gathering for no other known purpose than to prevent my attendance at
338 the actual rally attended by tens of thousands.

339 • Mets game on August 14, 2021 – Defendants systematized infliction of pain while
340 simultaneously engaging in provocative acts, language, and body language. These
341 operations included two induced sleep periods, during which Mets players were hitting
342 base hits and the crowd noise from 38,000 fans would have been substantial.

343 During the pain episode lasting approximately two to four minutes, “fans” sitting
344 very nearby provided the body language ranging from gaping mouths to legs stretched
345 over rows of seats as pain was inflicted in the outer ligament behind the left knee.

346 • These are only two specific recent examples of the impunity, provocative actions, and
347 reckless behavior by Defendants' agents involved in these operations. This is a very
348 limited sample of the efforts Defendants have engaged in against Plaintiff, in
349 collaboration with other witting or unwitting police agencies.

350 • Similar episodes, described elsewhere in this set of Plaintiff's statements, relate to
351 Plaintiff's physical condition. Defendants have induced shortness of breath, heart
352 irregularities, pain in various extremities, and a simulated stroke years ago in
353 Washington state around 2003. Defendants have caused, and continue to cause,

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354 symptoms and conditions leading to fear, pain, and financial expense for medical
355 expenses as well as other expenses for Plaintiff.

356 • Plaintiff has from time to time since his divorce, between 2004 and 2021, engaged in
357 attempts to form a serious relationship. On knowledge and belief, Defendants and their
358 witting or unwitting law enforcement partners have systematically deprived Plaintiff of
359 his right as a human being to form meaningful relationships with others. For his part,
360 Plaintiff has continued to use online platforms in an effort to establish such personal
361 relationships. Plaintiff has engaged in this continued practice to actually engage in a
362 meaningful relationship as Defendants know very well.

363 Plaintiff has also acted to provide accountability and traceability for these
364 operations and to avoid any effort by Defendants or their witting and unwitting partners
365 to cause or create any personal or security risk to Plaintiff in the absence of such
366 accountability. Defendants' fraudulent and illegal acts have systematically deprived the
367 Plaintiff of real and meaningful personal relationships and connections since 2004, while
368 engaging in a series of entrapment attempts relating to relationships Defendants have
369 either arranged or permitted. Defendants have thereby continued the shackling of
370 Plaintiff's rights as a human being. They have also implemented their own self-
371 documenting trap, with a long parade of character witnesses for the Plaintiff as well as a
372 complete and utter lack of any legal basis or foundation for their continues actions.

373

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374 • Since it is not legal to identify federal undercover officers engaged in performing their
375 "duties," and a federal prison sentence can result from doing so, Plaintiff is unable to
376 confront, identify, or photograph these agents of Defendants. Plaintiff is, in all practical
377 ways, prohibited by law from directly calling out their egregious, irresponsible,
378 humiliating, and painful acts at the time they occur. As Defendants' field agents are very
379 well aware, this form of systematized violation of liberty, property, free association, and
380 their persistent ability to deprive the Plaintiff of accurate information, all combined with
381 psychological and physical torment, provides Defendants' agents with an absolute cover
382 to operate with impunity, as the Plaintiff would otherwise face imprisonment for acting
383 out or publicly identifying these operatives. Also, the extremely vague conspiracy laws
384 of the United States provide great discretion to "investigators" and prosecutors to
385 charge conspiracy for even the most innocent acts of friends and family. Plaintiff has
386 consistently elected not to ensnare others in this "investigation."

387 Defendant FBI and other agencies of Defendant United States have continued
388 this pattern of conduct to the present day. As Plaintiff writes this Complaint and
389 Request For Injunctive Relief, these operations continue, including, for example,
390 involuntary body movements inducing pain in the torso and head, leg pain behind the
391 left knee, muscle and eye manipulations to induce typing errors, sneezing, and excessive
392 yawning to induct air through a small hiatal hernia and create intestinal pain and gas to
393 be used later in externally commanded gas releases from Plaintiff. Having experienced

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394 these symptoms for around 20 years now, Plaintiff can experience and report on these
395 symptoms in a clinical fashion despite the continued pain and distress they cause.

396 **CONFIRMATION OF TERRORISM INVESTIGATION BY THE CITY OF NEW YORK POLICE**

397 **DEPARTMENT**

398 Plaintiff made an information request under state law to the City of New York Police
399 Department, which responded on September 3, 2021, with the denial shown below. This denial
400 is currently under consideration for litigation as specific information relating to the use of
401 investigative tools and methods not ordinarily used were deemed necessary in this
402 investigation.

403 Plaintiff notes that the NYPD met the Plaintiff with a counterterror squad operation
404 including, without limitation, a sub-machine gun bearing line formation of officers on the Eighth
405 Avenue side of the Port Authority Bus Terminal upon Plaintiff's first visit to the City of New York
406 after his fake employment in August 2007 by Establish in Fort Lee, New Jersey. The NYPD clearly
407 took Plaintiff's presence in NYC as a serious security matter. This was most probably the result
408 of misinformation conveyed by Defendants as part of their effort to evade accountability for
409 their illegal and unconstitutional acts which, as stated above, have continued into the present
410 day.

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[OpenRecords] Request FOIL-2021-056-13163 Closed

 donotreply@records.nyc.gov
Fri 9/3/2021 11:07 AM
To: You

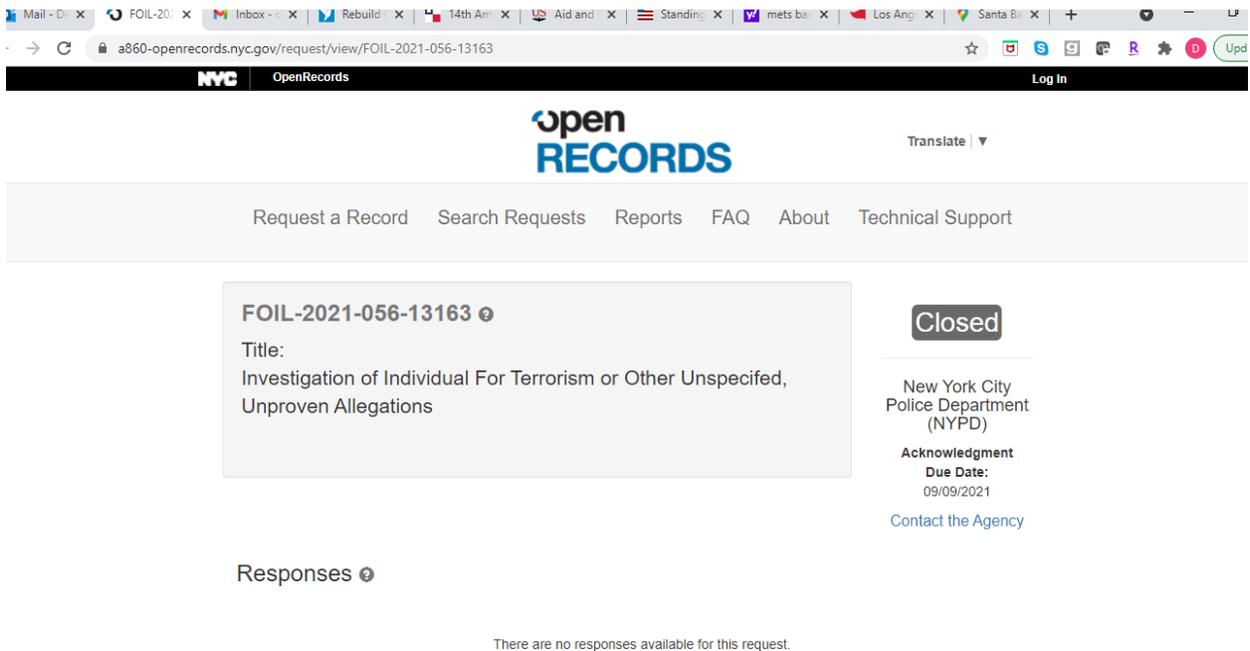
The New York City Police Department (NYPD) has **denied** your FOIL request FOIL-2021-056-13163 for the following reasons:

- In regard to the document(s) which you requested, I must deny access to these records on the basis of Public Officers Law Section 87(2)(e)(iv) as such information, if disclosed, would reveal non-routine techniques and procedures.

Please visit [FOIL-2021-056-13163](#) to view additional information and take any necessary action. You may appeal the decision to deny access to material that was redacted in part or withheld in entirety by contacting the agency's FOIL Appeals Officer: foilappeals@nypd.org within 30 days.

[Reply](#) | [Forward](#)

411



The screenshot shows a web browser window with the URL a860-openrecords.nyc.gov/request/view/FOIL-2021-056-13163. The page header includes the NYC OpenRecords logo and a "Log In" button. A navigation menu contains "Request a Record", "Search Requests", "Reports", "FAQ", "About", and "Technical Support". The main content area displays the request ID "FOIL-2021-056-13163" with a status of "Closed". The title of the request is "Investigation of Individual For Terrorism or Other Unspecified, Unproven Allegations". The agency is identified as the "New York City Police Department (NYPD)". An "Acknowledgment" section shows a "Due Date" of "09/09/2021". A "Contact the Agency" link is provided. Below this, a "Responses" section indicates that there are no responses available for this request.

412

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413 I declare under penalty of perjury under the laws of the United States of America that
414 the foregoing is true and correct. Executed on October 30, 2021.

415 