

541	Table: Key Contacts- Involuntary Servitude Of Lead Plaintiff	392
	5. Fifth, Fraudulent Concealment And Willful Blindness Sustain Obstruction Of Justice	393
550	Fraudulent Concealment	393
	Interline Exhibit 16: August 2021 58 th Anniversary MLK “I Have A Dream” Speech Lincoln Memorial Permit Allegedly Cancelled by Organizer – FALSE FOIA Response to Cover First Amendment Violation	398
555	Fraudulent Concealment - NYPD and FBI Coordinate Cover-Up of Human Trafficking, Pre-Texted Investigations	399
	Interline Exhibit 17: Defendants NYPD and FBI Coordinate September 2021 Fraudulent Concealment	409
	Interline Exhibit 18: Defendant FBI Sends Official Liar Letter in September 2021 Coordinated Fraudulent Concealment	411
	Interline Exhibit 19: Defendant Department of Justice Assistant Inspector General Investigations Division Declines Investigation of Defendant FBI, Then Ignores Lead Plaintiff’s Follow-Up Letter	413
580	Willful Blindness - Forty Complaint Letters To US Attorney Ignored	420
593	FACTS – 110 ILLEGAL PATTERN ACTS, VIOLATIONS, AND INJURIES	422
NATIONAL SECURITY PRETEXTING, FRAUDS, AND ENTANGLEMENTS (NSEC series offenses)		
600	NSEC-1 National Security Frauds: Government Orchestrated Family Assignment and Deliberate Entanglements in National Security Matters, 1961 to Present	447
601	NSEC-2 National Security Frauds: Human Trafficking, Forced Labor, Peonage, Inculcating Allied Intelligence Services - CSIS, RCMP, MI-6, MI-5, London Metropolitan Police, UK 1990-1994	456
602	NSEC-3 National Security Frauds: Involuntary Servitude, Forced Labor, Deliberate Entanglements To Violate Rights - Nuclear and Space Deliberate Entanglements, 9/11 Attack, Domestic Sabotage Campaign 1996-2009	460
603	NSEC-4 National Security Frauds: Human Trafficking, Forced Labor, Violations of Rights – Mossad, MI-6, MI-5, London Metropolitan Police, UK 2007	485
ILLEGAL HUMAN EXPERIMENTATION - BRMT BRAIN HIJACKING ABUSES (HEXP SUBCOUNT OFFENSES)		
Biological and Medical Invasions - Torture		
604	HEXP-1 Illegal Human Experimentation: Biological and Medical Invasions - BRMT Induced Torture, Washington State 2003	489
605	HEXP-2 Illegal Human Experimentation: BRMT Induced Torture And Psychological Operations, Massachusetts 2006-2007	495
606	HEXP-3 Illegal Human Experimentation: Torture And Psychological Operations, New Jersey 2008-2011	499

607	<i>HEXP-4 Illegal Human Experimentation: BRMT Induced Emotional Swings And Short Cycle Torture Sequences Through 2023</i>	509
<i>Orchestrated Personal and Intimate Relationships</i>		
608	<i>HEXP-5 Illegal Human Experimentation: Personal and Intimate Relationships - Orchestrated Romantic Interests Using BRMT Oxytocin Hormone Brain Hijacking, Generally</i>	515
609	<i>HEXP-6 Illegal Human Experimentation: Personal and Intimate Relationships - Orchestrated BRMT and Other Interference in Marital Community With First Spouse, Lynne 1980-1988</i>	521
610	<i>HEXP-7 Illegal Human Experimentation: Personal and Intimate Relationships - Orchestrated BRMT and Other Interference in Fraudulent Marital Community With Second Spouse, Jeanette 1988-2005</i>	525
611	<i>HEXP-8 Illegal Human Experimentation: Personal and Intimate Relationships - Orchestrated Romantic Interests, Induced Fraudulent Relationship, Marinka 2008</i>	531
612	<i>HEXP-9 Illegal Human Experimentation: Personal and Intimate Relationships - Orchestrated Romantic Interests, Induced Fraudulent Relationship, Laura 2014-2018</i>	539
613	<i>HEXP-10 Illegal Human Experimentation: Personal and Intimate Relationships - Orchestrated Romantic Interests, Induced Fraudulent Relationship, Gia 2019-2021</i>	544
<i>Biological and Medical Invasions – Personal Humiliation, Endangerment, Illness</i>		
614	<i>HEXP-11 Illegal Human Experimentation: Biological and Medical Invasions - Orchestrated Romantic Interests, BRMT Induced Erectile Dysfunction 2005, 2008, 2020-2021</i>	547
615	<i>HEXP-12 Illegal Human Experimentation: Biological and Medical Invasions - BRMT Orchestrated Personal Movements and Activities</i>	549
616	<i>HEXP-13 Illegal Human Experimentation: Biological and Medical Invasions - Reckless Endangerment Through BRMT Induced Defamation</i>	553
617	<i>HEXP-14 Illegal Human Experimentation: Biological and Medical Invasions - BRMT Induced Reactions, Symptoms, and Illnesses</i>	557
618	<i>HEXP-15 Illegal Human Experimentation: Biological and Medical Invasions - BRMT Forced Public Urination Sequence, 2022</i>	561
619	<i>HEXP-16 Illegal Human Experimentation: Biological and Medical Invasions - BRMT Public Flash Temper Hijacking, 2023</i>	563
620	<i>HEXP-17 Illegal Human Experimentation: Biological and Medical Invasions – Food Borne Illnesses 2008-2010, 2018-2023</i>	566
INDIVIDUAL RIGHTS VIOLATIONS AND CONSPIRACIES (RGTS SUBCOUNT OFFENSES)		
Entrapments, Illegal Searches and Willful Blindness		
621	<i>RGTS-1 Rights Violations: Entrapment and Incrimination Attempts, Stevens Pass 1980s</i>	569

622	<i>RGTS-2 Rights Violations:</i> Entrapment and Incrimination Attempts, Money Laundering - Alliance Nominee Cash Bank Deposit 1990, Akoto Structured Payments 2016-2017	573
623	<i>RGTS-3 Rights Violations:</i> Entrapment and Incrimination Attempts – FBI/RCMP VSE Pink Sheet Probe 1992-1993	578
624	<i>RGTS-4 Rights Violations:</i> Entrapment and Incrimination Attempts – FBI Sole Source, CFO Search, Tax Filings, Ironwood 2018-2023	583
625	<i>RGTS-5 Rights Violations:</i> Bad Faith Acts – Illegal Searches, Hacking, and Harassing, Oregon Interstate Commerce Trip 2021	588
626	<i>RGTS-6 Rights Violations:</i> Bad Faith Acts – Federal Police Powers Abuses of Legal Processes 1990 to present	592
627	<i>RGTS-7 Rights Violations:</i> Bad Faith Acts – Federal Police Powers Abuses of Legal Processes Forced Personal Bankruptcy 1993	605
628	<i>RGTS-8 Rights Violations:</i> Bad Faith Acts – Willful Blindness - US Attorney Offices, DOJ Headquarters 2005, 2021-2023	608
629	<i>RGTS-9 Rights Violations:</i> Bad Faith Acts – Illegal General Searches, Continual Monitoring 1968 to present	611
630	<i>RGTS-10 Rights Violations:</i> Bad Faith Acts – Privacy and Quiet Enjoyment	614
631	<i>RGTS-11 Rights Violations:</i> Bad Faith Acts – Biological and Medical Invasions, Access to Ethical Basic Health Care	617
<i>Direct Interferences in Personal and Intimate Relationships</i>		
632	<i>RGTS-12 Rights Violations:</i> Personal and Intimate Relationships - Orchestrated Romantic Interests, Arranged In-person Contacts	619
633	<i>RGTS-13 Rights Violations:</i> Personal and Intimate Relationships – Blocked and Spoofed Access to Dating Sites 2004-2005, 2007-2008, 2011-2014, 2018 to present	622
634	<i>RGTS-14 Rights Violations:</i> Personal and Intimate Relationships – Orchestrated Romantic Interests, Fraudulent Dates 2004-2005, 2008, 2019-2020	624
<i>Hacking, Harassment, Disinformation, Abuse of Official Records</i>		
635	<i>RGTS-15 Rights Violations:</i> Illegal Searches, Hacking, and Harassing, Computer Technology	628
636	<i>RGTS-16 Rights Violations:</i> Blocking Information Access and Supplying Deliberate Disinformation	630
637	<i>RGTS-17 Rights Violations:</i> Misuse of Official Records and Mispersonation, Dubai 2015	632
RACKETEERING – (RICO SUBCOUNT OFFENSES)		
Racketeering - Thefts and Takings Targeted at Personal Assets		
638	RICO Statute: Congressional Intent PL 91-452 (RICO) October 1970 “shall be liberally construed to effectuate its remedial purposes.”	635
639	<i>RICO-1 Racketeering Violations:</i> Involuntary Servitude, Forced Labor, Human Trafficking, Entrapment Attempts and Entanglements –	636

	Obstructing Market Rate Private Employment and Interstate Commerce From Deloitte (1979) through Establish (2008)	
640	<i>RICO-2 Racketeering Violations:</i> Theft and Takings - Financial Resources, Obstructing Market Rate Private Employment 1986 to present	645
641	<i>RICO-3 Racketeering Violations:</i> Theft and Takings - Financial Resources, Thefts of Compensation PAN 1993-1994, CNA 2002, Establish 2008	647
642	<i>RICO-4 Racketeering Violations:</i> Theft and Takings - Financial Resources, Thefts of Labor And Materials, Cliffside Park Apartment Renovations 2008	651
643	<i>RICO-5 Racketeering Violations:</i> Theft and Takings - Financial Resources, Deprivation of Benefits, Kidnapping, and Involuntary Commitment 2008-2011	654
644	<i>RICO-6 Racketeering Violations:</i> Theft and Takings - Financial Resources, Forced Labor Imposed Litigation Expenses 1993-2022	661
645	<i>RICO-7 Racketeering Violations:</i> Theft and Takings - Financial Resources, Shadow Banking System Thefts And Manipulations	667
<i>Racketeering – Personal Color of Law Entrapment Attempts</i>		
646	<i>RICO-8 Racketeering Violations:</i> Theft and Takings - Credit and Credit Access Hacks	669
647	<i>RICO-9 Racketeering Violations:</i> Illegal Searches, Hacking, and Harassing– Tax Software Hack EITC Entrapment Attempt 2021, 2022	672
648	<i>RICO-10 Racketeering Violations:</i> SOLE SOURCE Fraudulent Financing with Ironwood Tax Loss Self-Exculpatory Offset Attempt 2018-2023	674
<i>Racketeering – Targeting Small Business and Enterprise</i>		
<i>Racketeering - Thefts and Takings</i>		
649	<i>RICO-11 Racketeering Violations:</i> Deprivation Of SBA Government Bonding Benefits, UT Bonding Fraud 1990-1993	680
650	<i>RICO-12 Racketeering Violations:</i> Theft Of Receivables, Check Frauds 1990 To Present	684
<i>Racketeering - Fraudulent Financings</i>		
651	<i>RICO-13 Racketeering Violations:</i> Money Laundering - Alliance Nominee Cash Bank Deposit 1990	688
652	<i>RICO-14 Racketeering Violations:</i> Factoring Frauds –Pacific Financial Services 1992-1993, PAN Environmental Services 1993-1994	691
653	<i>RICO-15 Racketeering Violations:</i> Fraudulent Financial Services – Ex-CIA Northern Africa Case Officer 1992-1995 Alliance	695
654	<i>RICO-16 Racketeering Violations:</i> Fraudulent Financial Services – Ex-CIA Latin America Case Officer 2013-2015	700
655	<i>RICO-17 Racketeering Violations:</i> Fraudulent Financings and Loans - NYC Broker/Investor 2011-2017	703
656	<i>RICO-18 Racketeering Violations:</i> BRMT Assisted Check Fraud Entrapment Attempt – Top US Financial Institution 2014-2015	707

657	<i>RICO-19 Racketeering Violations: False Personation – NYC Forbes 200 Captive Corporate Investment Firm 2013-2017</i>	712
658	<i>RICO-20 Racketeering Violations: Fraudulent Investor Personation - Investments and Loans 2015-2019</i>	714
659	<i>RICO-21 Racketeering Violations: Fraudulent Investor Personation and Investments 2015-2020</i>	719
660	<i>RICO-22 Racketeering Violations: Fraudulent Financings – Private Placement and Public IPO 2015-2017</i>	722
661	<i>RICO-23 Racketeering Violations: Fraudulent Financings, International CFIUS Pretexting 2015</i>	725
662	<i>RICO-24 Racketeering Violations: Fraudulent Financing Fees Supporting Fraudulent Sales Opportunities 2018</i>	729
663	<i>RICO-25 Racketeering Violations: Fraudulent Financing Fees 2018</i>	731
664	<i>RICO-26 Racketeering Violations: Fraudulent Financial Services – Domestic Debt Broker 2018</i>	732
665	<i>RICO-27 Racketeering Violations: Fraudulent Financial Services - International Debt Broker 2015-2016</i>	734
666	<i>RICO-28 Racketeering Violations: Fraudulent Financial Services – Mid-Market Investment Bank 2016-2017</i>	736
667	<i>RICO-29 Racketeering Violations: Fraudulent Financial Services - International Financial Services Institution 2016-2017</i>	738
668	<i>RICO-30 Racketeering Violations: Fraudulent Financial Services – Wall Street and Los Angeles Investment Banks 2015-2021</i>	740
669	<i>RICO-31 Racketeering Violations: Fraudulent Financings and Representation, Online Referral Services 2015-2018</i>	750
670	<i>RICO-32 Racketeering Violations: Fraudulent Financings and Financial Representation, Fraudulent Solicited Responses 1986 to 2022</i>	753
671	<i>RICO-33 Racketeering Violations: Commercial Frauds: Fraudulent Financings and Litigation - AUCTUS v. CORNHUSKER 2019</i>	774
672	<i>RICO-34 Racketeering Violations: Fraudulent Financings, Online Platform 2021</i>	778
<i>Racketeering – Fraudulent Sales Leads</i>		
673	<i>RICO-35 Racketeering Violations: Fraudulent Sales Leads 2002-2004</i>	779
674	<i>RICO-36 Racketeering Violations: Fraudulent Sales Lead Solicitation Services 2021</i>	781
675	<i>RICO-37 Racketeering Violations: Fraudulent Sales Lead Solicitation Services 2021</i>	783
676	<i>RICO-38 Racketeering Violations: Fraudulent Sales Lead Development Services 2017</i>	784
677	<i>RICO-39 Racketeering Violations: Fraudulent Sales Lead Development Services 2017</i>	786

678	<i>RICO-40 Racketeering Violations: Fraudulent Sales Opportunities, International 2020-2021</i>	787
679	<i>RICO-41 Racketeering Violations: Fraudulent Sales Opportunities, Domestic 1983-2022</i>	791
680	<i>RICO-42 Racketeering Violations: Fraudulent Sales And Marketing Representation 2019-2021</i>	799
<i>Racketeering – Dishonest Professional Services</i>		
681	<i>RICO-43 Dishonest professional services – Accounting Compilation And Review 1993, 2021</i>	803
682	<i>RICO-44 Racketeering Violations: Dishonest Professional Services, Web 2021-2022</i>	806
683	<i>RICO-45 Racketeering Violations: Dishonest Professional Services, Legal 1986-2005</i>	808
684	<i>RICO-46 42 Racketeering Violations: Dishonest Professional Services, Legal 2014-2021</i>	813
685	<i>RICO-47 Racketeering Violations: Dishonest Professional Services, MARICOPA SHERIFF, ARPAIO as Consultant 2014-2017</i>	816
686	<i>RICO-48 Racketeering Violations: Dishonest Professional Services, Employees, Recruiters, Various Positions 1986-2022</i>	826
687	<i>RICO-49 Racketeering Violations: Dishonest Professional Services, Employees, Recruiters, Logistics 2015-2021</i>	831
688	<i>RICO-50 Racketeering Violations: Dishonest Professional Services, Employees, Sales</i>	834
689	<i>RICO-51 Racketeering Violations: Dishonest Professional Services, Employees, CFO and Controller</i>	836
690	<i>RICO-52 Racketeering Violations: Dishonest Professional Services, Employees, Controller 2018</i>	840
<i>Racketeering – Fraudulent Production Asset Sales</i>		
691	<i>RICO-53 Racketeering Violations: Fraudulent Production Asset Purchase Options, Professional Services 2015-2021</i>	841
692	<i>RICO-54 Racketeering Violations: Fraudulent Production Asset Purchase Options, AZ 2015-2017</i>	850
693	<i>RICO-55 Racketeering Violations: Fraudulent Production Asset Purchase Options, OR, ID, TX 2015-2021</i>	854
LETHALITY ATTEMPTS (LETHL SUBCOUNT OFFENSES)		
694	<i>LETHL-1 Lethality Attempts: British Columbia Sea to Sky Highway BRMT Melatonin Overdose – mid 1980s</i>	859
695	<i>LETHL-2 Lethality Attempts: Washington State BRMT Induced Falls, 1990-2005</i>	863
696	<i>LETHL-3 Lethality Attempts: Washington State BRMT Induced Suicide Ideation 2003-2005</i>	864
697	<i>LETHL-4 Lethality Attempts: Inciting Public Vigilantism, 2004-2023</i>	866

698	<i>LETHL-5 Lethality Attempts: New Jersey BRMT Induced Suicide Ideation 2008-2010</i>	870
699	<i>LETHL-6 Lethality Attempts: New Jersey Cliffside Park BRMT Falls 2008-2010</i>	871
700	<i>LETHL-7 Lethality Attempts: BRMT Staircase Falls and Attempts in New Jersey and New York 2008-2022</i>	873
701	<i>LETHL-8 Lethality Attempts: New Jersey, Hackensack, BRMT Fall, 2017</i>	875
702	<i>LETHL-9 Lethality Attempts: California, BRMT Induced Extreme Eye Watering, 2017</i>	876
703	<i>LETHL-10 Lethality Attempts: New Jersey, Edgewater Bedroom BRMT Falls, 2019</i>	879
704	<i>LETHL-11 Lethality Attempts: Website Hacks to Eliminate or Delay Covid Vaccination, 2020</i>	880
705	<i>LETHL-12 Lethality Attempts: New Jersey Edgewater BRMT Falls, 2021-2022</i>	882
706	<i>LETHL-13 Lethality Attempts: New Jersey North Bergen Hospital Fall, 2021</i>	884
707	<i>LETHL-14 Lethality Attempts: New York Metro North Mass Casualty Attempt, 2022</i>	886
708	<i>LETHL-15 Lethality Attempts: New York Morningside Park BRMT Fall, 2022</i>	888
709	<i>LETHL-16 Lethality Attempts: New York New Jersey North Bergen Vehicle Rundown Sequence, 2022</i>	890
710	<i>LETHL-17 Lethality Attempts: Programmed Health Collapse, 2023</i>	892
712	Key Illegal BRMT Program State And Local Government Co-Conspirators' Relationships To Federal Defendants	
716	A. Defendant FWSD - Federal Way School District	898
718	B. Defendant WSU – Washington State University	900
728	C. Defendant WASH - State of Washington	905
740	D. Defendant KCSD – King County Sheriff's Department	909
760	E. Summary – Lead Plaintiff's Relationships With Federal, State And Local Governmental Defendants	916
762	Summary Table	917
766	State and Local Government Co-Conspirator Employee Crossover Employment - Adverse Impacts On Lead Plaintiff and Other Class Members	925
767	Entities With Known Embedded Agent Which Employed Class Members	927
771	Other Lead Plaintiff Related Class Members' Involuntary Servitude - Employment Patterns	929
771	A. First Spouse Lynne's Employment Pattern	929
772	B. Second Spouse Jeanette's Employment Pattern	930
774	C. Father Don's Employment Pattern	931
777	D. Uncle Bruce's Employment Pattern	933

FACTS – 110 ILLEGAL PATTERN ACTS, VIOLATIONS, AND INJURIES

593. The 110 patterns of facts which follow (known as subcounts herein) are representative examples, not an exhaustive listing, of defendants' perpetuated conspiracy arranged by category of act, violation, and injury for ease of understanding. These illegal patterns of practice have been intertwined throughout this entire conspiracy from its beginning to the present, but are disentangled for ease of understanding. Six principal categories of acts, violations, and injuries are defined and described in this section of the complaint. These six categories illuminate these defendants' primary illegal patterns of color of law abuses, criminal acts, and constitutional, civil, and human rights acts, violations, and injuries in an associated-in-fact enterprise pattern of racketeering act and other constitution, civil, and statutory rights violations which span more than fifty-six years of fraudulent concealment relying on defendants' abuse of the state secrets privilege and their deliberate, knowing, willful, fraudulent entanglement of these plaintiffs in national security matters to sustain involuntary servitude and other constitutional rights abuses.

594. The six primary categories of BRMT (Brain Remote Management Technology), constitutional rights, and racketeering pattern acts, violations, and injuries are:

594.1 National Security Pretexting and Entanglements (subcounts NSEC-1 through 4)

– deliberate and intentional fraudulent color of law abuses by police powers and intelligence departments and agencies and other defendants, which pretext and entangle targeted US persons and others in “state secret “ privilege national security related events, operations, projects, and program for the corrupt purpose of fraudulently conceal continuing associated-in-fact enterprise patterns of racketeering acts, rights violations, and illegal biomedical experiments through abusive color of law operations, deliberate entanglements in a repetitive pattern of baseless

“investigations,” to sustain illegal cover company, surveillance, domestic and international cover operations and espionage, and other corrupt acts abusing police powers, and national security regulations applied under color of law outside the legal limits imposed by 5 U.S.C. § 301.

Similar to being “swatted” except that national security and complicity are incorporated directly into the corrupted police powers process.

594.2 Illegal Human Experimentation - BRMT Brain Hijacking Abuses (subcounts HEXP-1 through 17) – forcible human biomedical and psychological experiments on unwitting plaintiff human subjects without their consent, including a wide variety of attacks on and interferences with liberty; direct attacks on human autonomy, free will, and rights; and direct attacks on civil and Constitutional rights; including in and affecting interstate commerce.

Primary subcategories of offenses are:

- a) Biological and Medical Invasions – To And Including Torture: HEXP-1 through 4
- b) Orchestrated Personal and Intimate Relationships – To And Including Deliberate Orchestration and Malicious Termination: HEXP-5 through 10
- c) Biological and Medical Invasions – To And Including Personal Humiliation, Reckless Willful Endangerment, And Imposed Illnesses: HEXP-11 through 17

594.3 Individual Rights Violations and Conspiracies (subcounts RGTS-1 through 17) - direct interferences with liberty and freedom of choice in personal life and relationships, including pretexting, entrapment attempts, discrimination, incrimination, and related color of law malicious practices and patterns of practice. Primary subcategories of offenses are:

- a) Entrapments, Illegal Searches, and Willful Blindness: RGTS-1 through 11
- b) Direct Interferences in Personal and Intimate Relationships: RGTS-12 through 14

- c) Hacking, Harassment, Disinformation, Abuse of Official Records: RGTS-15 through 17

594.4 Racketeering Acts - Personally Targeted (subcounts RICO-1 through 10) -

racketeering acts and patterns of racketeering acts including, without limitation, frauds and predicate act frauds which have and do result in the direct and indirect loss of constitutionally property rights including, without limitation, personal, real, and financial assets, and career, employment, and income opportunities, all as managed for the convenience of the defendant UNITED STATES as the primary subjugator of unwitting involuntary servants in forced labor and peonage, and as a key element of perpetual involuntary servitude and involuntary servitude, to control all aspects of the life of the Lead Plaintiff and others similarly situated, to promote development of the illegal and internationally prohibited BRMT bioweapon and bioweapon delivery system, and to perpetuate the fraudulent concealment of illegal BRMT, rights, and associated-in-fact enterprise racketeering acts and conspiracy, which have and do injure these plaintiffs. Primary subcategories of offenses are:

- a) Thefts and Takings: RICO-1 through 7
- b) Color of Law Entrapment Attempts: RICO-8 through 10

594.5 Racketeering Acts - Business and Enterprise (subcounts RICO-11 through 55) –

associated-in-fact enterprise patterns of racketeering acts including, without limitation, common law frauds, predicate act frauds, deprivation of government benefits to small businesses, which deprivations have and do result in direct loss of business sales and income opportunities including, without limitation, property rights to contracts, projects, financial assets, real property, equipment, and other assets, all as perpetrated for the convenience of defendant UNITED STATES as the primary subjugator of involuntary servants, and including, without limitation, the

key elements of involuntary servitude, of involuntary servitude, and of forced labor and peonage used to dominate and control all aspects of the life of the Lead Plaintiff and others similarly situated. Primary subcategories of offenses are:

- a) Thefts And Takings: RICO-11 through RICO-12
- b) Fraudulent Financings: RICO-13 through RICO-34
- c) Fraudulent Sales Leads: RICO-35 through RICO-42
- d) Dishonest Professional Services: RICO-43 through RICO-52
- e) Fraudulent Production Asset Sales: RICO-53 through RICO-55

594.6 Lethality Attempts (subcounts LETHL-1 through 17) – personal injuries and potential injuries which are likely to result in severe injury or death.

595. These acts, violations, and injuries, and racketeering patterns thereof, are managed by and for the convenience of defendant UNITED STATES’ departments and agencies, and their co-conspirators, as they have and do engage in an associated-in-fact racketeering enterprise within their coordinated set of roles generally described at paragraphs 102-113. Certain of these abusive color of law operations have been and are conducted, by co-conspirators in this associated-in-fact enterprise which include, without limitation, state and local police powers departments and agencies NYPD, NJTPD, PAPD, NJSP, MARICOPA SHERIFF, BERGEN SHERIFF, and by other defendants who have and do conspire with defendant UNITED STATES’ departments and agencies, and/or with other co-conspirators in the overall associated-in-fact enterprise of illegal BRMT bioweapon and bioweapon delivery system program, constitutional and civil rights violations, and associated-in-fact enterprise pattern of racketeering acts, violations, injuries, and conspiracy.

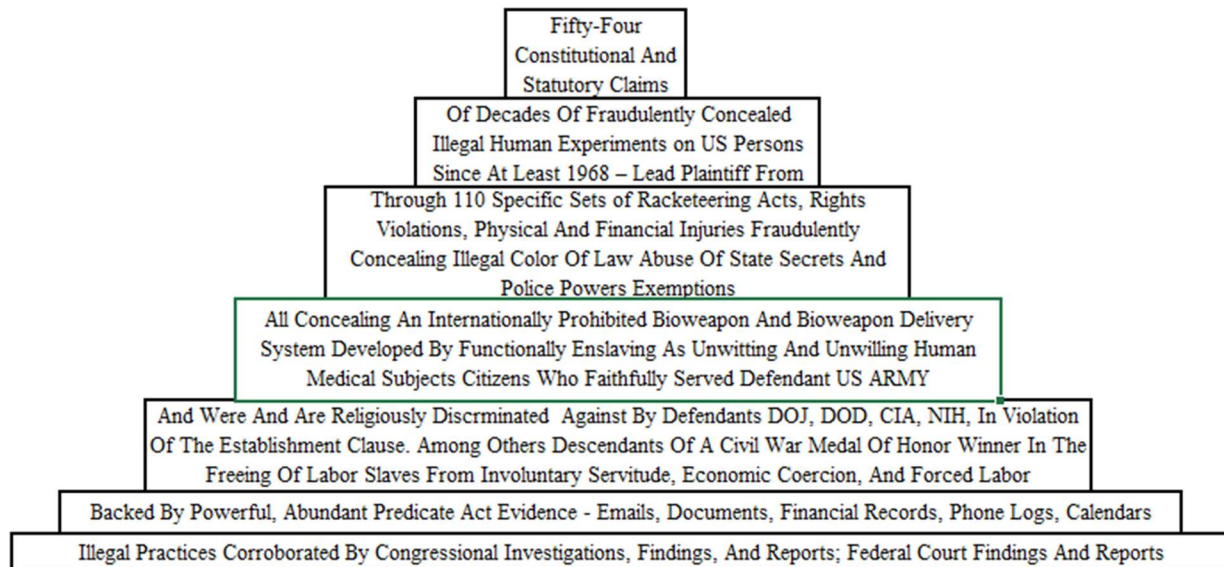
596. All these acts, violations, and injuries, and the patterns thereof, are key elements of defendant UNITED STATES' and co-conspirators' constitutional and statutory violations by, without limitation, involuntary servitude, forced labor, and peonage, which have been and are used to dominate, subjugate, and control all aspects of the life of the Lead Plaintiff and others similarly situated. Defendant UNITED STATES' overall intent has been and is to perpetuate the development of the illegal BRMT bioweapon and bioweapon delivery system through its past and continuing abuses of these plaintiff victims through its illegal human subject biomedical experiments and victimizations, to and including death. Imposed involuntary servitude among these plaintiffs ranges from short intervals of time to the lifetime abuses of some victims including, without limitation, Lead Plaintiff, whose injuries, short of actual loss of his life, are broadly representative of acts, violations, and injuries, and recurrent patterns of same in this conspiracy against this entire class of plaintiffs.

597. A compendium at LPEE pages 934-1075 lists key entities and individuals, selected emails, documents, and disbursements in both date order and alphabetic order using the RED colored page number found at bottom of each page which had been curated through the date of compendium. Additional materials are included in other exhibits not referenced therein as they were added after the date the compendium was prepared. Note there are spelling errors in the email subject lines referenced throughout these subcounts. These errors have not been corrected to maintain 100% traceability to the relevant LP Evidentiary Exhibit (LPEE). The directories of emails listed by date and party name in the compendium can be used to access these emails. Emails and documents discovered and curated later than the January 3, 2002 date of the compendium are listed in the later volumes of mixed documents beginning at LPEE page 10132. For most efficient retrieval, search the lower page numbered volumes first, then the higher

numbered pages of mixed documents which do contain some documents dating back to the 2000s.

598. The listing of 110 subcounts below (NSEC-1 through LETHL-17 paragraphs 600-710 inclusive) are a comprehensive set of examples in the Lead Plaintiff's own personal and direct experience over 56 years of abuses by these defendants. These 110 subcounts are the series of specific acts, violations, and injuries which these plaintiffs have experienced in common to varying degrees over varying periods of time. These 110 subcounts relate these acts, violations, and injuries directly to the 54 statutory and common law claims for relief which follow this section of the complaint. Each and every one of those 54 claims for relief are a specific and discrete violation of a specific federal statute and/or common law, as well as the directly related state laws cited therein. This layer cake organization structure is used to explain the full scope, extent, and duration of the incredibly complex and intertwined (a) illegal BRMT bioweapon and bioweapon delivery system program illegal human subject experiments, field tests, and other offensive weapon deployments against US persons, (b) associated-in-fact enterprise pattern of racketeering acts, (c) constitutional and civil rights violations and injuries, and (d) other statutory violations of these plaintiffs over decades by these perpetrator defendants.

[Intentionally left blank.]



599. Each and every one of the 110 subcounts at paragraphs 600 through 710 includes ALL of the following subparagraphs, which are incorporated therein by reference:

599A. Common Themes And Definitions In And Among Intertwined Subcount Acts, Violations, And Injuries

- (i) The BRMT bioweapon and bioweapon delivery system, which is illegal and subject to criminal penalties under 18 U.S.C. § 175, which provisions of law have been and are systematically ignored by defendant DOJ and by defendant UNITED STATES; and which is prohibited from development and operation by our Constitution, and by international law under the ratified 1975 *Bioweapons Treaty*;
- (ii) Each of the five subcount series' (NSEC national security entanglements, HEXP illegal human experiments, RGTS rights violations, and RICO racketeering acts and patterns, LETHL lethality attempts) includes a summary table at one or more of the subcounts in that series. This summary table relates the common evidence of all the subcounts in that specific series to every other subcount in that series and, where specifically noted, to specific subcounts in other series. For example,

the table at subcount LETHL-1, paragraph 600Q, relates each of the 17 LETHL series subcounts to each other, and to the subcounts in other series' which are specifically described therein.

- (iii) Each subcount consolidates multiple acts, violations, and injuries perpetrated by one or more defendants to the overall associated-in-fact enterprise. The exact number and date of certain violations remains to be determined through discovery against these defendants, as the identification of specific perpetrators and co-conspirators has been concealed by color of law abuses of state secret privilege and of police power exemptions.
- (iv) Relevant emails and other documents which provide predicate act fraud and other evidence are incorporated by reference in each subcount, (a) as specified in the table contained in that subcount and (b) as specified in the summary table for that subcount series. These entries are summarized in a compendium which contains a directory of evidence of key entities and individuals; and of selected emails, documents, and disbursements, which are listed in both date order and alphabetic order. This compendium is at LPEE pages 934-1075 (use the RED colored page numbers found at the bottom of each page to look up materials in LPEE) for materials curated by the date of the compendium, see also the note at paragraph 597 related to other materials discovered and curated after the date of the compendium.
- (v) Individual emails are listed in the compendium alphabetically by date. Most emails are found in date order (not filed in alphabetic order) from 2008 to 2022 at

LPEE pages 1076-6094. Additional emails and documents are in the mixed volumes of documents and emails in other LPEE volumes filed herewith.

- (vi) Relevant direct evidence is currently blocked, or hacked and deleted, from various Lead Plaintiff's email accounts by defendant UNITED STATES, including virtually all business and personal emails from March 4, 2018 through July 7, 2020, all of which are inaccessible to Lead Plaintiff as this complaint is being written.

599B. Overall Purpose And Intent of Defendants' Associated-In-Fact Enterprise Conduct

- (i) Defendants have and do fraudulently conceal their acts, violations, and injuries, and perpetuate their acts, violations, and injuries for the purpose of, among other things, (a) concealing their criminal and illegal deployment of the BRMT bioweapon and bioweapon delivery system against US persons and other innocents, and (b) concealing illegal acts of co-conspirator defendants, as these defendants have and do conspire to do since the illegal BRMT bioweapon and bioweapon delivery system program was initially conceived in the 1960s.
- (ii) Defendants' programmed and abusive color of law operations and entrapments have been and are intended and used (i) to pretext and attempt entrapments and inculcation of innocent victims, (ii) to attempt to exculpate this class of defendants and their co-conspirators, and (iii) to sustain the intricate illegal human subject biological and neurological medical experiments on, and abuses of, these unwitting plaintiff victims, who have been and are used to further develop and to sustain deployment of defendant UNITED STATES' illegal and internationally prohibited BRMT brain hijacking bioweapon and bioweapon delivery system.

(iii) Defendant UNITED STATES has and does continue to fraudulently arrogate to itself the liberty to act freely and willfully in the corrupt interests of its own institutions, departments, and agencies, and of these named and yet unnamed individual defendants, and of its co-conspirators, in patterns of unconstitutional acts, and statutory violations, and associated-in-fact enterprise patterns of racketeering acts and conspiracy which have and do directly contradict the liberty interests and “unalienable” constitutional, civil, and human rights of US persons, which these institutions and individuals are explicitly constitutionally sworn to protect, while systematically sustaining willful blindness and official silence in direct violation of the mission and purpose of defendant DOJ’s initial establishment in 1870.

(iv) These acts have been and are conducted by defendant UNITED STATES and by its co-conspirators, some of whom are explicitly sponsored, funded, and contractually bound co-conspirator institutional and individual defendants, to sustain defendant UNITED STATES’ perpetual control, involuntary servitude, forced labor and peonage, against Lead Plaintiff and other similarly situated US persons, in violation of our Constitution, of other statutes cited throughout this Complaint, in its continuing fraudulent abuse of the “state secrets” privilege which violates the mandates of 5 U.S.C. § 301 (paragraph 260, Interline Exhibit 2) and *United States v. Reynolds*, 345 U.S. 1, 12 (1953) (paragraphs 260, 319).

(v) All subcounts throughout this Complaint (NSEC-1 through LETHL-17 paragraphs 600-710 inclusive) are driven by defendants’ conspiracy to commit, and together, as actually perpetrated in defendants’ field operations, comprise an

associated-in-fact enterprise pattern of racketeering acts, constitutional and civil rights violations, state statutory violations, and conspiracy.

599C. Actual Defendants' Associated-In-Fact Enterprise Operational Conduct

- (i) Fraudulent illegal BRMT bioweapon and bioweapon delivery system biochemical brain hijackings, illegal human subject experiments, and deprivations of constitutional and civil rights, resulting from these defendants' careful timing of events, and from deliberate and malign brain hijackings during public exposure to facilitate vigilantism, have been and are elaborately contrived at vast taxpayer expense by defendants to appear as life circumstances and events, so as to conceal them from public understanding. These incidents, events, and cycles of misconduct have been and are used to control and human traffick Lead Plaintiff and other plaintiffs through a series of physical and emotional traumas and humiliations, as related throughout this complaint.
- (ii) These deliberately perpetrated traumas and humiliations include, without limitation, (a) the selection, assignment, and destruction of teenage and adult personal friendships and intimate relationships; (b) destruction and recovery of physical and mental health; (c) enduring long-cycle and episodes of short-cycle torture; (d) extreme periods of biochemical brain hijacking to invoke suicide ideations; (e) homelessness and the related stress of losing relationships and virtually all possessions from a position of relative propriety and comfort; (f) enterprise failures, arbitrary terminations from employment, and extended deliberate unemployment; (g) de facto takings of real, financial, personal, and intangible assets; (h) various dire emergency situations with sometimes avoided

lethal consequences (paragraph 10, Interline Exhibit 1 is indicative of lethal consequences most probably not avoided); (i) other traumas and frights directly created by or arising from these defendants' acts, violations and injuries, and from their willful and negligent violations of the privacy and other constitutional rights of these plaintiffs. These which acts, violations, and injuries have and do expose these plaintiffs to abnormal public safety risks from (j) public vigilantism, and from (k) police powers departments and agencies which have and do engage in discriminatory patterns and are known to use excessive force. Illegal field tests of medical practices and of tools of violence have resulted in the deaths of victims, as cited herein.

(iii) Defendant inflicted and perpetrated acts affecting interstate commerce include, without limitation, fraudulent commercial sales opportunities, and the business necessity to expend time and financial resources to locate and secure financings thereof which have and arise as a result of, and have been and are continuously interfered with by defendants, through their offering of fraudulent pending sales opportunities they have no intention be completed, and as elements of a pattern of commercial and police powers frauds and conspiracies of defendants affecting commerce and interstate commerce. The overriding intent of defendants in these violations, has been and continues to be, to consume the financial resources and management time of Lead Plaintiff and the entities he legally owns, controls, and/or manages, and of other plaintiffs similarly situated, to perpetuate their involuntary servitude in violation of the *Thirteenth* Amendment and other

elements of violations of constitutional and civil rights and of statutes of the United States and the various states.

- (iv) Defendant inflicted and perpetrated acts affecting interstate commerce include, without limitation, fraudulent impositions in interstate commerce conducted by Lead Plaintiff, and by others similarly situated, of corporate officers, employees, consultants, legal and professional service providers, who are actually defendants' own undercover defendant police powers personnel, intelligence personnel, and military personnel in civilian dress, or others they elect to infiltrate for their own corrupt purposes, who thereby have and do supplant legitimate qualified private individuals, and thereby deprive Lead Plaintiff and other plaintiffs similarly situated of their legal and constitutionally protected access in interstate commerce to qualified individuals, as elements of these defendants' conspiracy to, and pattern of practice of, acts, violations, and injuries which deprive Lead Plaintiff, his related entities, and others similarly situated, of their right to pursue and benefit from commerce and interstate commerce. These defendants have and do sustain their associated-in-fact enterprise and pattern of racketeering acts, injuries, and violations against Lead Plaintiff and other plaintiff victims, with the overriding intent to illegally consuming the financial resources and management time of these plaintiffs, including, without limitation, Lead Plaintiff and the entities he has and does legally own, control, and/or manage to, without limitation, maintain involuntary servitude, forced labor, and peonage.

599D. Pattern Abuses Of The Revocable State Secrets Privilege And National Security Regulations Sustain Illegal BRMT, Rights, And Racketeering Acts, Violations, And Injuries

(i) This deliberate pattern of human trafficking and cross-border entanglements in national security and related investigations repeats a pattern of practice which defendant UNITED STATES has and does use to facilitate color of law abuses of US persons by and in their own service, and by foreign intelligence services who can conduct otherwise illegal operations against US persons and then “share” this otherwise illegally acquired intelligence with defendant UNITED STATES. These representative color of law abuse patterns of practice include, without limitation:

- a. 1978: Defendant UNITED STATES acting through, without limitation, defendants FBI, CIA, ARMY and associated individual defendants, used defendant WSU for human trafficking and involuntary servitude by directly placing Lead Plaintiff, while a Teaching Assistant and graduate student, in shared offices with foreign nationals under the care and surveillance of defendants UNITED STATES, CIA, and FBI, particularly including a foreign national from Iran during the Iranian Revolution against the Shah of Iran (Mohammed Bahari-Kashani) and a graduate student from Malawi, so as to abuse national security regulations as tools for otherwise illegal surveillance of Lead Plaintiff.
- b. 1983: Defendant UNITED STATES acting through, without limitation, defendants FBI, CIA, ARMY and associated individual defendants, used Deloitte Seattle for human trafficking and involuntary servitude in interstate commerce, and Queen Elizabeth II’s visit to the Seattle Westin, a national security event which integrated MI-6 (Martin Astengo) into the

Westin Hotel staff for a time, and to abuse foreign intelligence operations and information sharing as tools for otherwise illegal surveillance of Lead Plaintiff.

- c. 1992-1994: Defendant UNITED STATES acting through, without limitation, defendants FBI, CIA, ARMY and associated individual defendants, used PAN for human trafficking and involuntary servitude affecting interstate commerce, and for cross-border trafficking and associated-in-fact enterprise fraudulent financings to involve RCMP, CSIS, MI-5, MI-6 and London Metropolitan Police. and to abuse foreign intelligence operations and information sharing as tools for otherwise illegal surveillance of Lead Plaintiff.
- d. 2003 - Defendant UNITED STATES acting through, without limitation, defendants FBI, CIA, ARMY and associated individual defendants, used Engelman Associates, Vancouver, WA, dba SoftSelect, and entertainment industry actors in an illegal domestic spying operation of defendant UNITED STATES (FBI) to provide fraudulent sales leads for services into Iran which violated US government sanctions on the Islamic Republic of Iran in an attempt to pretext and entrap Lead Plaintiff in violations of US sanctions law, and to abuse national security law and regulations as tools for otherwise illegal surveillance of Lead Plaintiff. This specific entrapment attempt featured an entertainment industry actor, name not recalled, who posed as Mark Engelman, the proprietor of the company doing business as SoftSelect, Vancouver, WA during the wrecking of

Allegent. LLC by defendants UNITED STATES, FBI, ROSENBERG, FAUCI, PRAY, CALDWELL, and unknown others. The actor is a public figure who has starred as a male lead actor in one or more Martin Scorsese films, subject to identification during discovery.

- e. 2007-2008: Defendant UNITED STATES acting through, without limitation, defendants FBI, CIA, ARMY and associated individual defendants, used defendant ESTABLISH (paragraphs 11, 465, 603 NSEC-4) for cross-border trafficking and associated-in-fact enterprise involuntary servitude and employment discrimination to involve MI-5, MI-6 and London Metropolitan Police. and to abuse foreign intelligence operations and information sharing as tools for otherwise illegal surveillance of Lead Plaintiff.
- f. 1984-2022: Defendant UNITED STATES acting through, without limitation, FBI, CIA, ARMY and associated individual defendants, have and do use various cross-border meetings, seminars, and presentations, brokered international sales opportunities, and direct sales opportunities with international subsidiaries of US companies to abuse national security regulations and foreign intelligence services as tools for otherwise illegal surveillance of Lead Plaintiff.
- g. 2015: Defendant UNITED STATES acting through, without limitation, defendants FBI, CIA and associated individual defendants, have and do use the forgery of a Qatari government form and fraudulently misrepresent

its royal family as interested investors who sign a \$52 million investment agreement with Lead Plaintiff to invest in his Winnett entities.

- h. 2018-2023: Defendant UNITED STATES acting through, without limitation, defendants FBI, CIA, ARMY and associated individual defendants, have and do use the Senator Menendez foreign agent investigations and indictment (Egypt, Qatar) and an Egyptian foreign national proposed by defendant CFO SEARCH (MAGGARD, FBI) to human traffick and abuse national security regulations as tools for perpetuating otherwise illegal surveillance of Lead Plaintiff (paragraph 300-302, 563-569, 624 RGTS-4, 670, 672, 682, 689 RICO-32, 34, 44, 51).

- (ii) This set of abusive practices are routinely and illegally deployed in color of law abuses to deliberately ensnare, ensnarl, and attempt to entrap Lead Plaintiff, perpetuate his involuntary servitude, forced labor, and peonage, and to sustain the illegal continuing development of defendant UNITED STATES, CIA, and ARMY's illegal BRMT bioweapon and bioweapon delivery system from at least 1968 to the present time, and to abuse state secret privilege, national security regulations, foreign intelligence operations, and foreign intelligence information sharing, as tools for otherwise illegal surveillance, subjugation, and involuntary servitude of Lead Plaintiff in defendants' pattern of illegal BRMT, rights, and racketeering acts, violations, and injuries against Lead Plaintiff and other similarly situated.

- (iii) This associated-in-fact enterprise pattern of predicate and illegal practices has been applied against Lead Plaintiff, and others similarly situated, by defendant

UNITED STATES, named and unnamed co-conspirator defendants, since at least 1968.

599E. Fraudulent Concealment Of Abuses Behind The Revocable State Secrets Privilege

- (i) Defendant UNITED STATES has and does engage in claiming “state secret” privilege as if this privilege were an irrevocable privilege, and “national security” regulations” which are not enforced as required, as playing cards by which it invalidly claims it can arbitrarily of its own accord and without review, deploy at will to trump the “unalienable” constitutional rights of individual US persons, in the fraudulent game these defendants play with the lives of these abused plaintiffs, with the lives of other US persons, and with plaintiffs’ personal, mental, physical, and financial well-being, and property rights, while depriving these plaintiffs through its own whims, accords, conspiracies, and failures to act, of their “unalienable” constitutional rights.
- (ii) Discovery of the primary defendants in this case was carefully, and at enormous taxpayer expense, fraudulently concealed for decades by these perpetrator defendants, despite their continuing undercover operations in plain sight. Forensic breakthroughs in this case beginning in Summer 2023 (LPEE pages 12251-12261) led to specific identities of individual perpetrator defendants who figure in the overall illegal BRMT bioweapon and bioweapon delivery system, constitutional and civil rights, and associated-in-fact enterprise pattern of racketeering acts and conspiracy. These identifications then explicitly connected the pattern of acts, violations, and injuries, and the underlying corrupt means, motives, and *mens rea*, directly to the responsible defendant departments, agencies, and institutions. This

coordinated fraudulent concealment by these defendants was extensive, deliberate, and nearly foolproof, for almost six decades.

- (iii) This pervasive fraudulent concealment by these defendants, as further described at paragraphs 307-321, 550-583, equitably tolled the statute of limitations for this entire complex intertwined pattern of acts, violations, and injuries in the decades-long associated-in-fact conspiracy including, without limitation, defendant UNITED STATES' illegal BRMT bioweapon and bioweapon delivery system, related patterns of constitutional and civil rights violations, and the associated-in-fact pattern of racketeering acts and conspiracy.

599F. Inextricably Intertwined Pattern Of Acts, Violations, And Injuries

All 110 subcounts herein are critical elements of the defendants' overarching and continual pattern of involuntary servitude, forced labor, and peonage at all times from inception, in at least 1968 if not earlier, to the present time which violate, without limitation, the *First, Third, Fourth Fifth Eighth Thirteenth and Fourteenth* Amendments to our United States Constitution, in furtherance of the defendants' conspiracy to, and systematic violations of, without limitation:

- i. 18 U.S.C. § 175 prohibiting the use and deployment of biological weapons and biological weapons delivery systems against US persons; in furtherance of conspiracy to and violations of
- ii. 18 U.S.C. §§ 241, 242, 246, 247, prohibiting conspiracy against and violation of rights; and in furtherance of conspiracy to and violations of
- iii. 18 U.S.C. § 1581 relating to peonage,
- iv. 18 U.S.C. § 1584 relating to involuntary servitude,

- v. 18 U.S.C. § 1589(a)(3) relating to forced labor, and
- vi. 18 U.S.C. § 1590 relating to human trafficking with respect to peonage, slavery, involuntary servitude, and forced labor,
- vii. Dozens of additional sections of the United States Code listed at paragraphs 8 and 251, and
- viii. Related state statutes, as listed at each of the 54 claims for relief at paragraphs 801-854.

599G. Inextricably Intertwined Bad Faith Acts, Violations, And Injuries By Individual Defendants

- (i) All 110 subcounts incorporate, without limitation, constitutional rights claim(s) made against individual defendants herein under 28 U.S.C. 2679(b)(2), and, without limitation, 18 U.S.C. §§ 1961-1968, and/or 42 U.S.C. §§ 1983, 1985, 1986, which claims for relief are made under the *First, Third, Fourth, Fifth, Eighth, Ninth, Thirteenth*, and/or *Fourteenth* Amendments to the Constitution.
- (ii) At each paragraph below, each set of emails and correlated documents in the tabular listing of cross-references and evidentiary exhibits (LPEE) is one set of the thousands of constitutional rights, fraudulent concealment, and/or pattern of racketeering acts sequences undertaken against Lead Plaintiff by the associated-in-fact enterprise of these defendants originated by defendant UNITED STATES in the late 1960s. If pled in detail in this initial filing, these individual sequences would extend the Complaint by many thousands of pages and be filled with redundant citations of the same curated evidence. The tabular listing at each paragraph is a far more efficient use of this pleading and provides particularity as required by F. R. Civ. P. Rule 9(b) without excessive redundancy.

(iii) Each of these thousands of sequences is pled in this fashion for efficiency and brevity in pleading in an already voluminous pleading. This is a necessity for judicial efficiency (a) in view of the fact that special access granted by defendant UNITED STATES was and is required to sustainably communicate with Lead Plaintiff in the unconstitutionally constrained environment of lies, disinformation, and hyper-intrusive surveillance created and perpetuated by defendant UNITED STATES and its co-conspirators, (b) defendants' systematic abuse of cover entities, fraudulent and spoofed websites, and information sources, used for their own purposes in this unconstitutionally constrained environment, (c) defendants' pervasive use of cover entities and identities for themselves and those to whom they have and do grant special access to a never convicted or incarcerated person (Lead Plaintiff) who nonetheless has been and is subjected to illegal human trafficking, undue restraints, on-going human experimentation and continual illegal brain biomedical hijackings by the illegal BRMT bioweapon and bioweapon delivery system, and (d) the reasonable expectation that the hundreds of contact entities listed and the number of specific individuals directly culpable will collapse to a limited number of actual defendants, including a limited number of police powers and intelligence agencies subject to the jurisdiction of the United States, and to media and politically connected persons and institutions granted special access to Lead Plaintiff's environment by defendant UNITED STATES, its departments and agencies, and through and by other sovereign governments' departments and agencies, as defendants have and do (i) systematically and illegally constrain constitutional rights of these plaintiffs including, without

limitation Lead Plaintiff, for (ii) their own illegal purposes, and (iii) the illegal personal privilege and purposes of certain individual defendants, named and unnamed, who have and-or do participate over the course of this illegal program as field operatives and/or in executive leadership roles during these decades of illegal constraints and restraints of constitutional rights, and who have and do knowingly perpetuate these illegal constraints and restraints of constitutional rights of US persons for their own direct personal benefit and convenience.

599H. Discovery Will Support Additional Acts, Violations, And Injuries

- (i) Discovery against these defendants will produce further evidence of the illegal BRMT bioweapon and bioweapon delivery system induced bodily reactions and involuntary responses included in each subcount. Discovery, as required by law under, among others, the *Nietzke* and *Denton* mandates will, without limitation:
- (ii) provide further evidence of extensive correspondence and documentation of exchanges among, by, and/or with these defendants using email and other electronic means,
- (iii) provide crucial further identifications of known and unknown institutional and individual perpetrators and of at least some portion of the victims who comprise this class of injured plaintiffs,
- (iv) recover Lead Plaintiff's own electronic records prior to 2007 which are currently in the hands of defendant FBI, having been handed by Lead Plaintiff in Fall 2007 to defendant ROSENBERG while he posed as William Drumm at defendant ESTABLISH in Fort Lee, NJ, after being transcribed from a hard disk, likely by an FBI lab then using cover company third party identity,

- (v) recover medical records related to Lead Plaintiff and to other plaintiffs, likely including copies secretly maintained by defendant UNITED STATES, its medical contractors and/or researchers, for the purposes of sustaining illegal BRMT bioweapon and bioweapon delivery system research and development operations including, without limitation, an extensive array of illegal human subject experiments, which validate these claims, to the extent those records have not been destroyed by obstructions of defendants; and/or copies of those records secretly maintained by defendant UNITED STATES' to conceal from evidence records secretly maintained and destroyed from normal discovery by abusive human trafficking which has and does lead to lack of contact with initial providers and their destruction of records due to the passage of time and lack of continuing interactions between plaintiffs and those providers,
- (vi) recover financial, business, and personal records related to Lead Plaintiff and to other plaintiffs, likely including copies secretly maintained by defendant UNITED STATES, its contractors and/or researchers, for the purpose of sustaining illegal BRMT bioweapon and bioweapon delivery system research and development operations, which validate these claims, to the extent those records have not been destroyed by obstructions of defendants; and/or copies of those records secretly maintained by defendant UNITED STATES' to conceal from evidence records secretly maintained and destroyed from normal discovery by abusive human trafficking which has and does lead to lack of contact with initial providers and their destruction of records due to the passage of time and lack of continuing interactions between plaintiffs and those providers,

- (vii) provide further evidence of federal funding and cross coordination of military departments and agencies including, without limitation, defendants ARMY, USAF, NAVY, JOINT STAFF, DARPA in violations of posse comitatus by illegally leveraging interpersonal relationships, personnel, and facilities; and in conspiracy to violate constitutional rights, federal and state statutes; together with defendants DOJ, DHS and their police powers agencies including, without limitation, defendants FBI, USMS, DEA, USSS, and CPB; together with intelligence agencies including, without limitation, defendants CIA and ODNI. These violations and conspiracies also have and do extend to domestic research institutions funded by defendant UNITED STATES in developing knowingly psychologically and medically coercive and intrusive operations and in knowingly developing illegal medical technologies deployed with the illegal BRMT bioweapon; to press, media, and entertainment who have and do play active roles in violations of rights and statutes; to police powers departments and agencies who engaged in and perpetuated illegal coercive operations against rights exceeding statutory authority throughout the United States; and to collaborators in foreign intelligence and police powers departments and agencies in Canada, United Kingdom, France, and Israel, not incorporated as defendants herein,
- (viii) facilitate development of additional evidence through interrogatories, depositions of direct witnesses, as well as through the routine internal reports of these incidents authored and controlled by defendants, particularly relating to the illegal BRMT bioweapon and bioweapon delivery system, prejudicial and

pretexted concealed police powers operations, and the associated-in-fact patterns of racketeering acts.

[Intentionally left blank.]

National Security Pretexting, Frauds, and Entanglements (NSEC series offenses)

600. NSEC-1 National Security Frauds: Government Orchestrated Family Assignment and Deliberate Entanglements in National Security Matters, 1961 to Present

A. Lead Plaintiff is a descendant of Quakers, who serve in military service as religious conscientious objectors. His great-great grandfather, Willian John Brewer, is buried five miles north of West Point, where the US ARMY Military Academy has been located since after the Revolutionary War. At Appomattox Courthouse, Virginia on April 4, 1865, he earned the Medal of Honor for his service in the Union Army during the final major battle of the Civil War to end slavery. He then attended assassinated President Lincoln that same month as a member of the Honor Guard. Lead Plaintiff, and other members of this class, among them many direct descendants of this honorable servant to these United States, have been and continue to exist in involuntary servitude, in violation of the *Thirteenth* Amendment, which was ratified by the states effective December 6, 1865. This status, in involuntary servitude, has been perpetrated and perpetuated by defendant UNITED STATES, and particularly inculcates the original and continuing unconstitutional and illegal conduct of, without limitation, defendants ARMY, CIA, and DOJ, whose paramount duties are to provide for the common defense and to establish justice, in accordance with our Constitution. They do not.

B. As forensically reverse engineered, Lead Plaintiff's maternal grandfather, also a member of a Quaker related religious group, was employed beginning in the 1950s at a coopted farmer's cooperative (Farmer's Union Central Exchange, now known as Cenex) for much of his adult life after World War II. Both Lead Plaintiff's father and uncle served in the US ARMY Medical Corps as conscientious objectors. Lead Plaintiff's uncle's life and career path bears a

marked resemblance to the Lead Plaintiff's own subsequent path, to and including college era romantic interests and difficulties experienced throughout their careers and entrepreneurial activities. There are echoes directly across the generations between his now deceased father and the Lead Plaintiff as well. And among members of this extended family. And in common with the families of marital communities formed and destroyed by defendant UNITED STATES. And among private enterprises formed and/or acquired by these US persons and destroyed by defendant UNITED STATES. And among members of this close knit religious group, some of whom have been recruited and/or maneuvered into sustained series' of fraudulent church services operated by defendant UNITED STATES. Defendants ARMY, CIA, and DOJ paramount duties are to provide for the common defense and to establish justice, in accordance with our Constitution. They do not.

C. Lead Plaintiff's father was employed by an illegal FBI cover company, Pacific Paper Products, Tacoma, Washington, from approximately early 1961 to June 1963, first in northern and then southern California, for the stated purpose of selling examination table and surgical table disposable paper drapes to medical doctor practices and to medical facilities such as hospitals. The actual surreptitious purpose of this FBI cover company was to destroy physical medical evidence of crimes committed by agents, informants, police powers, and violent militia members engaged in the violent anti-civil rights campaign then underway, unmasked as Cointelpro in 1971 when it discovered by a citizen activist burglary of a Media, PA FBI satellite office. By his unwitting actions, Lead Plaintiff's father was being misdirected and duped into removing and recycling X-ray films from targeted medical practices to destroy this highly incriminating evidence, as defendant FBI and its collaborators continued their illegal Cointelpro program and other illegal and violent operations against civil rights activists and others. When

offered a third transfer, this time from southern California to Texas, Lead Plaintiff's father quit and returned the young family to Washington state where he pursued work as a route delivery employee, later delivery route owner under the watchful eye of another defendant FBI or USMS undercover agent named Earl Keller (paragraphs 414, 415).

D. Defendant UNITED STATES has purposefully and repeatedly entangled Lead Plaintiff in national security matters as a corrupt pattern of practice from the age of 12 (paragraph 417). Lead Plaintiff attended a government designated spin-out school in the Federal Way, WA school district, Decatur High School, with 83 "students" in its initial graduating class, which included youthful undercover agents posing as high school students. As a base for a secret government program, this school included, among many others, KATYAL (FBI or ARMY), posing as Shawn Morrissey a fellow student who fell from a horse while riding bareback lacking experience and broke ribs while riding one of the family horses (paragraphs 221, 490).

E. Defendant UNITED STATES continued its pattern of pretexting Lead Plaintiff in police powers investigations, and in intelligence and national security matters for the purpose of perpetuating and covering up his involuntary enrollment as a human subject of BRMT in the early 1970s while he is a high school teenager (at age 16). He and his cousin, Steve Smith, encountered an apparent hitchhiker, actually a federal agent who left a classified briefcase satellite phone in the bed of Lead Plaintiff's pickup truck in Summer 1972. The briefcase was spotted by Lead Plaintiff in the pickup bed a few miles after the hitchhiker was dropped off, and safely returned to that agent at the Greenwater Tavern in Greenwater, Washington. With his fingerprints on the handle and locks of the briefcase, Lead Plaintiff had again been deliberately pretexted into a national security matter, as satellite phones would have been classified equipment, as satellite and cellular telephones unknown to the general public in 1972.

F. As a teenager, Lead Plaintiff worked for Larry's Market, an independent food market in Federal Way, Washington, which was co-owned by Larry Brewer, a cousin of Lead Plaintiff's father, and unbeknownst to the family, by FBI acting through an undercover agent who posed as a business partner and produce manager for a time. WEISSMAN (FBI agent, later as General Counsel under Director Robert Mueller) was then illegally embedded at Associated Grocers, a wholesale grocery cooperative which supplied Larry's Market, among others. Lead Plaintiff worked for Larry Brewer for three years through high school and his first year of college at Green River Community College in 1973-74.

G. Transferring to Washington State University in Fall 1974, Lead Plaintiff entered Perham Hall, a WSU student dormitory. Close college era friends included numerous persons who were in fact government employees of defendants FBI, DOJ, CIA, and the military, (including, without limitation, defendants PAGE, William SACKVILLE-WEST, other SACKVILLE-WEST family members in Spokane, WA, GARLAND, CUNHA, BREYER in Spokane, WA; as well as Linda Pogreba, Karen Raines, Katherine Andrews, Susan Irish) some of whom unwittingly assisted in managing and sustaining the involuntary servitude of the Lead Plaintiff and others to support the secret, illegal development of the internationally prohibited BRMT bioweapon and bioweapon delivery system by defendant CIA (Science and Technology Directorate) and defendant ARMY (Bioweapons Lab). This program was and is sustained by racketeering operations and rights violations perpetrated and perpetuated by defendant DOJ, primarily through defendants FBI and USMS.

H. After graduate school, Lead Plaintiff was trafficked to Deloitte Seattle, where FBI and CIA were involved in his initial professional assignment to an audit of Safeco Mutual Funds in Seattle. He met his first wife Lynne in 1980 at Deloitte Seattle. Lynne was the former wife of a

then King County Sheriff's Department serial killer task force commander and later Maple Valley, WA precinct commander, with shared two early teen daughters. Lynne was later removed from Lead Plaintiff in late 1987-1988 by a divorce which resulted from sustained BRMT induced overdoses of oxytocin in the presence of serial adulterer, Robert SWAIN.

I. While at Deloitte Seattle (a cover operation described elsewhere herein), Lead Plaintiff spotted his first national security spy, Christopher Boyce, a convicted submarine espionage escapee from Lompoc, CA captured near Port Angeles, WA in or around late August 1981 in an orchestrated event, as Lead Plaintiff walked one morning from an ATM machine near his Seattle-First Bank building office at Deloitte Seattle, back toward his car to pay for parking that morning. An unmarked prisoner van and two unmarked Ford Crown Victoria federal police cruisers swept into the secured loading dock of the U.S. Federal Courthouse on Fifth Avenue in Seattle about 60 feet ahead of the Lead Plaintiff, carrying the convicted spy while Lead Plaintiff walk back up Spring Street to pay for parking at a lot on the east side of the I-5 freeway.

J. Defendant WEISSMAN (FBI) first appeared to Lead Plaintiff in 1981 or 1982 as the General Manager of Puget Consumers Cooperative, which Lead Plaintiff joined at the suggestion of an embedded department secretary at his first employer, Deloitte Seattle, and became a Board of Trustees member, then Chair.

K. After defendant BURNS (then program manager, now current CIA director) destroyed his first marriage to Lynne using an illegal BRMT oxytocin sequence against her in 1987-1998, BURNS orchestrated his next marriage through WATERS (paragraph 609 HEXP-6), to his second wife, Jeanette, which resulted from an coerced orchestrated introduction related to the deferred prosecution of this defendant ARMY enlisted member, and timely illegal BRMT oxytocin boosts after they met. The introduction itself was a field operation in 1988 undertaken

by defendant UNITED STATES. Stephen M. WATERS, an unknown federal agent, posing as a software engineering contractor at LazerSoft, orchestrated the introduction with other field agents of defendant UNITED STATES during the latter stages of Lead Plaintiff's divorce from first wife , Lynne. During this period, Lead Plaintiff also sought out an offline dating service and was orchestrated into a fruitless cover operation by defendant FBI instead. Defendant FBI then presented again overtly as friends, Kerry (FBI, bank robbery squad) and Laurie Vanderberry (embedded at Jeanette's employer) introduced through his second spouse, Jeanette.

L. Lead Plaintiff's second extended family included numerous persons portraying themselves as friends or relatives who were in fact government employees of defendants FBI, DOJ, CIA, ARMY, and other military services. These include specific individual defendants who concealed their actual identities and official positions, which actual identities were unknown to the Lead Plaintiff until September 2023 or later. In several cases, these individuals have built new legends which morph then from their undercover identities, changed their ages to significantly younger ages to cover their chronological age at that time, modified certain aspects of their biographies, and in some cases modified their appearances in relatively minor ways, in order to conceal their prior roles in this illegal program. These include, without limitation, BREYER, a former Associate Justice of the Supreme Court; Alexander and Yvgeny VINDMAN, two former members of the National Security Council; STONE, a consultant to Republican candidates and presidents; and MELBER, WEISSMAN, ROSENBERG, RUBIN, media personalities, who were defendant DOJ and/or FBI employees at the time of their fraudulent interactions with Lead Plaintiff. These known individual defendants are individually identified at LPEE pages 12251-12261. Others will be identified through the discovery process.

M. This color of law pattern of deliberate national security event pretexting and targeting has continued through forensic review which began in mid-2021 and through preparation of this complaint. The complaint has been drafted in late 2023 and 2024 in the most recently human trafficked location – Edgewater, NJ, the epicenter of the Senator Menezes domestic and national security corruption investigation by defendant DOJ’s FBI and SDNY US Attorney’s office, where Lead Plaintiff was human trafficked in November 2018, a few months after that investigation was started by defendant FBI.

N. This narrative comprises and has consumed Lead Plaintiff’s entire adult life as related at paragraphs 350 through 584, and all subcounts herein at paragraphs 600-710. This narrative is representative of the scope of acts, violations, and injuries at the hands of the defendants to this entire class of plaintiffs. Defendant UNITED STATES has and does reprise the same illegal patterns of practice and conspiracy, together with its institutional and individual co-defendants, in illegal color of law abuses of state secrets privilege which it used to perpetrate, fraudulently conceal, and neglect to prevent in its acts, violations, and injuries under defendant CIA’s MKUltra illegal LSD drugging program and defendant FBI’s Cointelpro, its war on US persons “unalienable” constitutional rights under the *First, Third, Fourth, Fifth, Eighth, Ninth, Thirteenth* and *Fourteenth* Amendments to our Constitution.

O. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content in

searchable indexes and lists at LPEE Compendium at pages 934-1075. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	2, 3
Complaint paragraphs:	221, 414, 415, 417-418, 490, 350 through 584, 600-710, 609 HEXP-6
Appendix 2 paragraphs:	Entirety
LPEE Table 2 pages 12023-12120 paragraphs:	Entirety
LPEE pages (see technical note on page numbering at paragraph 230):	LPEEV65-6, 7
Emails and documents by topic and date, also located in LPEE:	Emails and documents are controlled by defendant UNITED STATES - as delivered to ROSENBERG (FBI) in 2007, and in USPS handled mail surveillance in 2008, 2010, possible recovery at Ramsey, NJ in 2018

P. Defendant DOJ's USMS managed Deloitte Seattle in 1979-1986, managed CNA Industrial Engineering in 1996-2002, and Establish in 2007-2008 as illegal cover companies used by DOJ and other federal departments and agencies for their illegal surveillance and spying operations. Harold Hopper and Michael Henderson at Deloitte Seattle, Joseph Holden at CNA Industrial Engineering who declined to spin-out to Allegent, as he explained he was close to Cook (FAUCI), and unknown member of the Establish employee team were the through line USMS undercover personnel in these roles. Hopper supervised the Deloitte Seattle office until he retired and was replaced by Hendersen. Holden worked on various CNA projects including, without limitation, with David Brown on Port of Seattle International Airport and Anchorage International Airport baggage systems for Alaska Airlines and others, worked on the Larry Harding Rapistan-initiated Nikken project which Lead Plaintiff redesigned for the Irvine, CA distribution center which included the mandated and unneeded package sorter required by the illegally embedded CFO which facilitated illegal spying on the multi-level marketing company's independent sales team, and on HomeGrocer warehouse design projects. Defendant

ESTABLISH hosted defendant ROSENBERG as its ostensible General Manager, replaced in rotation by ROSS during Lead Plaintiff's ten month employment tenure during that human trafficking sequence.

Q. This associated-in-fact enterprise pattern and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; human medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content in searchable indexes and lists at LPEE Compendium at pages 934-1075. Directly cited relevant pre-discovery evidence and information which relates this subcount to other relevant subcounts includes, without limitation:

Interline Exhibits:	2, 3
Complaint paragraphs:	221, 350 through 584, 414, 415, 417-418, 445-449, 454, 465, 471, 490, 494-501, 555-562, 600-710; 604D, 606N, 609 HEXP-1, 3, 6; 626, 635, 636, 637 RGTS-6, 15-17; 644, 645, 646, 647, 649, 650, 651, 653, 669, 670, 683 693, RICO-6-9, 11-13, 15, 31-32, 45, 55
Appendix 2 paragraphs:	1-006 through 1-017, 1-020 through 1-026, 1-031, 1-032
LPEE Table 2 pages 12023-12120 paragraphs:	Entirety

LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 416-426, 428, 569-571, 575-581, 598-606, 766-769, 778-780, 8294-8346, 10376-10393, LPEEV65-6,7,17
Emails and documents by topic and date, also located in LPEE:	Emails and documents are controlled by defendant UNITED STATES - as delivered to ROSENBERG (FBI) in 2007, and in USPS handled mail surveillance in 2008, 2010, possible recovery at Ramsey, NJ in 2018

601. NSEC-2 National Security Frauds: Human Trafficking, Forced Labor, Peonage, Inculcating Allied Intelligence Services - CSIS, RCMP, MI-6, MI-5, London Metropolitan Police, UK 1990-1994

A. As forensically reverse engineered, during 1990 through 1994, defendant UNITED STATES, its agents, officers, and confidential informants, co-opted and/or conspired with Canadian and British intelligence and police powers organizations to develop further national security entanglements of Lead Plaintiff beyond the already existing initial entanglements related to Lead Plaintiff and his marital family's travels to Vancouver, British Columbia and Queen Elizabeth II's visit to Seattle, WA in March 1983. This corrupt collaboration facilitated the abuse of international spying operations across borders against citizens of various allied countries by allied foreign intelligence services. Alliance was destroyed by FBI and caused the personal bankruptcy of Lead Plaintiff and his spouse, Jeanette, in 1993 (paragraphs 445-449).

B. As forensically reverse engineered, as part of defendant UNITED STATES' intentional financial wrecking of Lead Plaintiff's company Alliance, which incorporated (i) fraudulent co-ownership and control through a nominee (David J. Carey as nominee, FBI, paragraphs 445-449, 649 RICO-11), (ii) fraudulent legal representation (HIBBS and Susan THORBROGGER, DOJ/FBI, both embedded at Short Cressman Burgess law firm, paragraphs 446; 626 RGTS-6, 649, 651, 653, 683 RICO-11, 13, 15, 45), (iii) fraudulent deprivation of government benefits (SBA bonding, paragraph 446, 471; 649, 653 RICO-11, 15), (iv) theft and

compromise of receivables (Steve and Kerry Brewer, FBI, paragraphs 644, 650, 651 RICO-6, 12, 13), was then succeeded by (v) this Vancouver, B.C. fraudulent financing.

C. During this specific defendant FBI wrecking process – this time through Alliance (Steve’s Maintenance) the business secretly co-owned by defendant FBI through Carey, through Lead Plaintiff’s orchestrated personal bankruptcy, and through Lead Plaintiff’s subsequent fraudulent employment at P.A.N. Environmental Services (PAN), defendant UNITED STATES directly and through confidential informant or agent CORNWELL (CIA commercial cover agent, who had operated in north Africa while posing as an irrigation equipment dealer) and his supposed spouse (a female FBI agent), abused the Lead Plaintiff affecting interstate commerce in his search for equity financings for Alliance, where he was CEO and principal owner. CORNWELL and FBI used an extended series of fraudulent equity financing search trips made to Vancouver, British Columbia, while seeking financing intended by Lead Plaintiff to offset the prior frauds, thefts, and denial of SBA bonding and loan guarantees by defendant UNITED STATES against Lead Plaintiff’s environmental services company, Alliance in 1990-1993, tot sustain involuntary servitude, forced labor, peonage, and perpetuate the illegal BRMT bioweapon and bioweapon delivery program illegal human experiments and associated-in-fact enterprise pattern of racketeering acts, rights violations, and conspiracy.

D. CORNWELL had previously operated with his twin brother in CIA commercial cover operations by selling center pivot irrigation systems to farmers throughout the United States to cover this form of covert intelligence operations in northern Africa, primarily Libya, in the 1970s and 1980s, from a dealership in Pasco, Washington.

E. The Canadian intelligence and police powers operations, most likely RCMP and CSIS, posed in various roles and as domestic and international mining executives and financiers

in various office locations throughout Vancouver, British Columbia, Canada, include various associates of CORNWELL known as John Young, Ralph Shearing, and Rory Godhino, a barrister from the Vancouver, British Columbia region, all of whom figure in the fraudulent Alliance financing sequence.

F. After Alliance was destroyed by defendants in 1993 and unable to find other employment as result of defendant wire frauds and other interferences in employment, Lead Plaintiff joined PAN, where Cornwell was CEO and Lead Plaintiff became PAN COO. Cornwell arranged trips to Ontario, California where two of the three alleged PAN subsidiaries were located, and to London, UK for equity financing. In London, Cornwell with and Lead Plaintiff met and worked with MI-6 and other British intelligence officers and police powers deep cover personnel and cover operations (likely London Metropolitan Police and MI-5), primarily operated through an individual known to Lead Plaintiff as Michael Kurtanek, likely an MI-6 agent, posing as a Managing Director - Mining for Credit Lyonnaise Laing, an international investment bank headquartered in France, who operating from its stock trading operations in London. Lead Plaintiff traveled to London on three occasions, including one three week long business trip. On one of these trips between Summer 1993 and the end of 1994, Lead Plaintiff is greeted by a trotting Metropolitan Police counter-terror squad in a lengthy construction tunnel at Heathrow Airport. He was the only other person in the 500 plus foot long tunnel in mid-afternoon at a busy Heathrow Airport international terminal. This is the second of three similar instances related to national security spying and terror-related alerts and episodes, including one in Seattle in August 1981 and another in New York City around November 2007.

G. This series of defendant FBI and CIA international RICO frauds included persons posing and/or acting as financial brokers, barristers, company executives, and in other

professional roles to facilitate these frauds and swindles and permit foreign intelligence operations to “legally” engage in color of law spying upon the Lead Plaintiff in British Columbia, Canada, and London, England as well as within the United States using intelligence acquisition methods and assets which defendant UNITED STATES cannot legally deploy against its own citizens. Agents operating in international cover roles as financiers engaged in fraudulent financings on behalf of the Lead Plaintiff’s own company, Alliance, and on behalf of PAN, all of which were fruitless and intended to perpetuate defendant UNITED STATES’ involuntary servitude of the Lead Plaintiff both in the United States and in their own countries.

H. RCMP and/or other Canadian officers, agents, and cooperators, together with defendant UNITED STATES undercover agents and officers, have also been engaged by FBI and CIA to provide discrete security and surveillance of Lead Plaintiff and his families for various trips over many years to Vancouver and Whistler, British Columbia. Lead Plaintiff’s solo trip to the Rocky Mountain area of western Alberta in 2005 in late Summer 2005 included an overnight disappearance and search of the Lead Plaintiff’s briefcase travel bag including his personal computer and all related tracking data and documents to that point, somewhere between Lake Louise, Calgary, Canada, and its recovery at the front desk of his condo hotel in Canmore, Calgary, Canada, the following day.

I. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants’ long-running schemes, frauds, and swindles to sustain defendant UNITED STATES’ involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; human medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and

racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	445-449; 626 RGTS-6; 644, 649, 650, 651, 653, 683 RICO-6, 12, 11, 13, 15, 45; 446, 471
Appendix 2 paragraphs:	1-017
LPEE Table 2 pages 12023-12120 paragraphs:	2-0003 through 2-0012, 2-0024, 2-0059, 2-0060, 2-0095, 2-0097, 2-0109, 2-0153, 2-0155, 2-0202
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al
Emails and documents by topic and date, also located in LPEE:	Not applicable

602. NSEC-3 National Security Frauds: Involuntary Servitude, Forced Labor, Deliberate Entanglements To Violate Rights - Nuclear and Space Deliberate Entanglements, 9/11 Attack, Domestic Sabotage Campaign 1996-2009

A. As forensically reverse engineered, the Lead Plaintiff was human trafficked from PAN onto Pacific Pipeline’s Board of Directors, Kent, WA, around Summer 1994, then to the COO position there in late Summer 1995 (paragraph 454, 465), by FBI’s Charles ROSENBERG (Chuck LeFevre as then known while CEO at NutraSource). This cover company was a defendant FBI embedded domestic book wholesaler spying operation. Over Lead Plaintiff’s private objections to the “founder” Vito Perillo, PERILLO elected to proceed with what became

a disastrous ERP software system implementation in Fall 1995 to early Spring 1996, which extensively damaged finances and sales reputations both at the company and at a large number of independent retail booksellers in the Pacific Northwest who were out of stock from their key distributor due to the ERP problems with order fulfillment for what turned to be yet another Christmas season of many. These problems were blamed on computer problems (but were actually deliberate and intentional targeted sabotage aimed at these small independent businesses, which were often founded on overstretched credit card limits, personal loans, and second mortgages with personal guarantees. Defendant FBI could then pick and choose who got damaged by using the computer system to arbitrarily short-fill orders for certain retailers, could establish and then cut generous credit limits to damage sales, give slow credits for returned books and thereby reduce access to credit lines and store inventory stocking levels, demand customer financial information including personal financial information on owners to spy on them and to identify personal vulnerabilities, and engage in other *Fourth* Amendment violations against both small businesses and their owners by posing as their preferred supplier offering generous terms and free shipping on volume orders which were used to capture and retain customers, including those disfavored individuals targeted for financial wrecking, which Lead Plaintiff himself has now experienced multiple times from the 1980s into the 2020s.

B. Once the aforementioned ERP problems were resolved after eight to nine months of exhaustive efforts by the operations team and Lead Plaintiff to sustain company order fulfillment operations and in the late stages of his buyout attempt which would fail, PERILLO arbitrarily terminated Lead Plaintiff from his unwitting involuntary servitude at Pacific Pipeline by its “founder” Vito PERILLO (USMS) in Spring 1996. PERILLO wrecked Pacific Pipeline a few months after the Lead Plaintiff left in 1996, during a Barnes and Noble annual review in New

York City when he fired them as Pacific Pipeline's largest customer, about 55% of revenue which eventually led to the company's bankruptcy and demise when expenses were not controlled to match dramatically declining revenue, a pattern now recognized as a defendant DOJ trademark signature pattern. These cover company wrecking processes cover up evidence of years-long targeted defendant DOJ police powers agency spying and illegal spying and inquiries into company and personal finances and assets which violate the *Fourth* Amendment.

C. The company was also used by defendant FBI to orchestrate targeted self-publishers who wrote on disfavored topical areas or who wrote about unfavored perspectives into financial ruin by offering to distribute their books on consignment. Imagined and fictional inflated sales opportunities were used to encourage authors to self-publish. Large print runs were encouraged to get full case shipments into discount stores, chains, and buying clubs. Print run expenses on these consigned books were borne by the author and could consume substantial personal financial resources, requiring thousands or tens of thousands of dollars of personal loans or home mortgages based upon falsely and grossly inflated expectations of sales envisioned by the cynical undercover buyer embedded at Pacific Pipeline and the author who thought they had just written one of the greatest books ever. Consigned books that were stocked by Pacific Pipeline for sale at retail bookstores and at large retailers like COSTCO and Barnes and Noble would not be reimbursed for their sales for six months or more after those press run expenses were incurred because books which do not sell through to retail customers are returned to the distributor, Pacific Pipeline, and then to the publisher, spelling financial ruin for some when those over-inflated sales expectations did not materialize. Staff reported these types of incidents to the Lead Plaintiff while he worked there.

D. When defendant DOJ destroyed Pacific Pipeline, it was done in bankruptcy court. Consigned inventories do not belong to the consignor (original self-published author who paid the printing expenses and other costs). The consigned inventories belong to the bankruptcy estate and are liquidated to benefit secured creditors, then unsecured creditors, so the self-published author gets to see that inventory be sold for little or nothing to a liquidator and the funds used to satisfy secured creditors and others, typically receiving nothing in the bankruptcy liquidation. With careful planning, undercover embedded police powers personnel can maximize the financial losses to a self-publisher by pressing them for additional inventory in the months leading to the pre-planned bankruptcy date when the self-publisher will lose 100% of the funds they have advanced for print runs and other expenses.

E. Lead Plaintiff's arbitrary termination from Pacific Pipeline in Spring 1996 was followed by about six months of programmed unemployment facilitated by wire fraud hacking of employment sites and telephone intercepts and fraudulent employment interviews with FBI and/or USMS personnel posing in prospective employer roles. Lead Plaintiff had a base salary of about \$125,000 in 1995-96 at Pacific Pipeline before this defendant UNITED STATES programmed six month period of unemployment.

F. He was next human trafficked to C.N.A. Industrial Engineering, (CNA) Bellevue, WA, by CNA employee Greg Lins in late Summer 1996, and a couple of months after a September 1996 consulting project contract sales proposal to Henry Schein, a medical supplies wholesaler in Port Washington, NY, did not succeed, Lead Plaintiff was offered an \$80,000 salary by Charles Hadjinian (a former CIA covert asset from Nicaragua's Samozza regime who was spirited out of Nicaragua and into this DOJ/USMS cover company sometime before the Samozza regime collapse) which he negotiated up to \$88,000. He had no bargaining power as all

other employment options were surreptitiously foreclosed by defendant FBI mail and wire fraud to sustain his involuntary servitude in defendants' illegal BRMT bioweapon and bioweapon delivery system program, constitutional and civil rights violations, and associated-in-fact enterprise pattern of racketeering acts. He joined CNA full time in November 1996 in Kirkland, WA, and met FAUCI within the first four weeks of his employment. About the same time, he began experiencing severe headaches which were traced to presbyopia (vision issues associated with middle age) and required bifocal eyeglasses. The prescription progression was normal for a time at each annual renewal but has gradually reversed since his first renewal in New Jersey in 2008. This medically implausible sequence of lesser strength eyeglass prescription requirement at each renewal since that time is the reverse of the normal aging process. This is but one element of a variety of bizarre health issues and outcomes health issues perpetrated by defendant UNITED STATES using its illegal BRMT bioweapon and bioweapon delivery system (paragraph 617 HEXP-14).

D. Soon after the Lead Plaintiff's full time employment in November 1996, CNA began work on a material handling systems engineering design and implementation supervision contract for the Boeing/USAF Delta IV rocket assembly plant in Decatur, AL, which was secured by H. Paul LOWBER (FBI undercover), who left soon after the contract was secured. Lead Plaintiff was once again deliberately inculpated in another national security project. USAF "could not locate" this multi-billion dollar heavy lift rocket project despite extensive dialog with the USAF FOIA representative during Lead Plaintiff's FOIA request in 2021, another clear lie in this long-running government cover-up. This CNA material handling design and implementation engineering subcontract was with The Austin Company, the general contractor which constructed the Boeing/US Air Force Delta IV rocket assembly plant in Decatur, AL. Lead

Plaintiff's further unwitting pretexting and entanglements in national security matters and his unwitting involuntary servitude was thus continued without any notice.

DELTA IV ROCKET FACTORY THE BOEING COMPANY



E. As this project progressed, CNA sent Lead Plaintiff to Torrance, California to work on a programmed project failure, ostensibly for Davidson Entertainment (later CUC after a buyout of Davidson), a gaming and educational software company, which involved an Accu-Sort laser barcode sorter from this USPS mail sortation contractor. The sorter was ostensibly set up to fill custom orders for software retailers in a warehouse in Torrance, ran successfully on occasion, but sabotaged over its telephonic support line as FBI personnel tied up the Lead Plaintiff in this Los Angeles area project, and a co-employee at CNA worked with a team of contractors to construct a failed software system implementation project alongside the sorter sabotage project for about 18 months. Incomplete and failed software projects became a common theme which emerged over many years through 2022. Defendant FBI forced expenditures of about \$1.2 million on this programmed project failure, as ordered by their Davidson embedded John Goodman who ran operations, to keep the Lead Plaintiff occupied for about 18 months. Soon after this project failure, Chuck Hadjinian was “terminated” from CNA (just as STONE had

been “terminated with sturm und drang from Lazersoft in early 1987, paragraphs 437-440), and Lead Plaintiff was promoted to Managing Director for CNA, consistent with the still not understood FBI pattern of practice in the unwitting Lead Plaintiff’s involuntary servitude.

F. CNA also engaged in other sensitive technologies projects during Lead Plaintiff’s tenure, including software selection for non-destructive eddy current technology testing equipment and services company (Zetec, Issaquah, WA) which supports the nuclear industry, aerospace, rail and other key industries in the United States and elsewhere. Software selection and engineering services require extensive detailed knowledge of processes and procedures, so Lead Plaintiff and his team developed an extensive body of knowledge of the technology, company services, and customer base to assist this client to make the optimal software system selection.



Sustaining the energy for the power generation industry

We have extensive experience in conducting feasibility studies and developing inspection solutions in the power generation industry. From developing and maintaining standardized processes to developing customized solutions for client specific needs, we are a leader in enabling utilities to reduce their inspection costs, improve their safety and reduce their downtime. Our clients can count on our [eddy current and ultrasound technologies](#) to be safe, sophisticated and successful in the procedure of flaw detection of their critical systems.

Nuclear

With our world- class manufacturing and breadth of offerings in the [eddy current instruments](#) and [ultrasound technologies](#), we can exceed the demands of the power generation industry. Our extensive experience in the [nuclear segment](#), and our ability to leverage learnings from other segments, helps us deliver products that are well-engineered and field-tested. [Discover our nuclear solutions.](#)



G. Lead Plaintiff was also engaged by Media Arts Group in San Jose, California to design its new art production and distribution facility to be built in Morgan Hills, CA. This study and design process began under the project management of a defendant CIA commercial cover covert agent temporarily redeployed from Thailand to San Jose, CA, who was able to use Media Arts Group as his interim commercial cover while in the United States. This defendant CIA asset then reportedly redeployed to the Asian outsource manufacturing technology sector about six months later. CNA continued with the project through design, implementation, and completion. A similar study, design, and implementation process for Nikken, a Japanese consumer products multi-level marketing firm, was undertaken in Orange County, CA, allowing defendant FBI to spy on yet another “Japanese Miracle” company and its myriad levels of individual Americans

who purchased these products as small business independent distributors by installing a unneeded shipping sorter from Rapistan, the American subsidiary of Dematic. The sorter allowed the capture of destination name and address shipping information at the Nikken distribution center, and was ordered by the illegally embedded CFO. The former illegally embedded distribution center manager was recycled out of deep cover there, reportedly “dying” soon after the sorter was up and running in the distribution center, probably resurrected into her next assignment in a new identity.

H. These projects continued CNA’s long history of unprofitable industrial design and engineering projects, which had already included various US NAVY nuclear submarine base construction and maintenance facility projects in the Pacific Northwest; domestic international airport projects at Sea-Tac and Anchorage on baggage systems; the Boeing 747 assembly plant; and the “Japanese Miracle” Sega, Sony, Nintendo, and Panasonic manufacturing and distribution plants in the United States. These prior projects, and the projects Lead Plaintiff was involved in were in fact, undertaken as commercial cover domestic intelligence and counterintelligence operations of the United States, some legal, some simply broad gauge illegal spying on, and wrecking where deemed appropriate by defendant DOJ and its police power agencies. The Lead Plaintiff was thereby continually being entangled unknowingly in various commercial cover domestic and international intelligence operations as he has been since arriving at his supposedly private employer, Larry’s Market, in 1972. (As a historical note about patterns of culpability and patterns of illegal practice, defendant DOJ’s Attorney General Robert Kennedy had approved some of the illegal surveillance of civil rights leader Dr. M. L. King, Jr. by defendant FBI, and it was “no holds barred,” according to senior FBI officials who testified to the Senate for the 1975 Cointelpro report at pages 6885-7288).

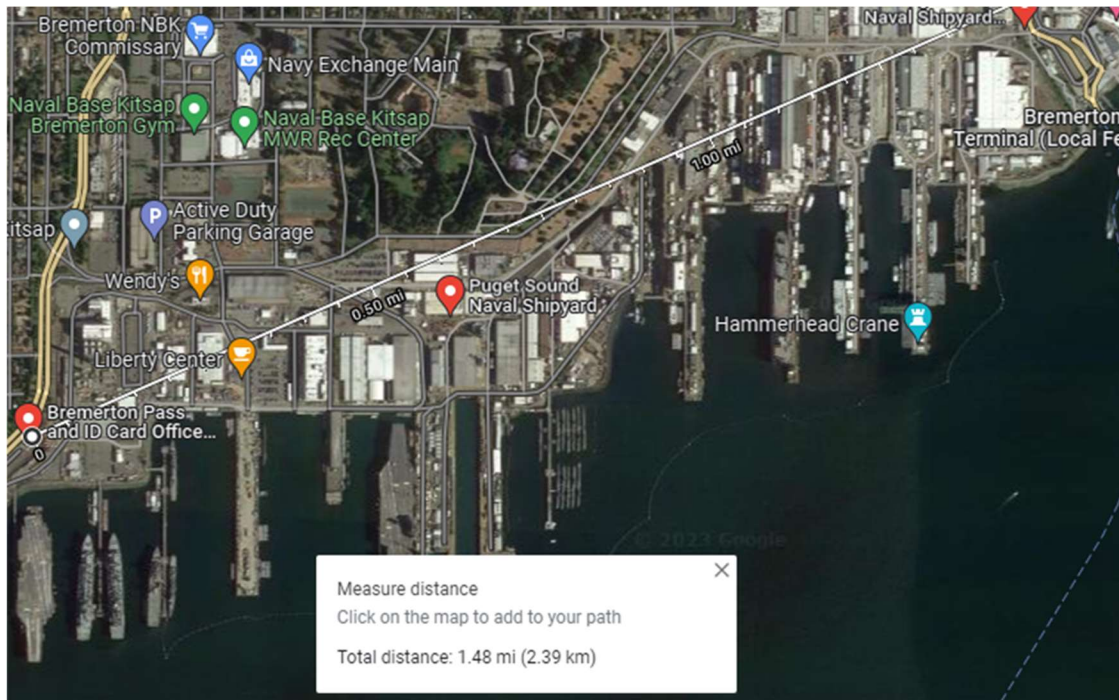
I. In May 2001, the Lead Plaintiff traveled to Washington, DC for the annual May AeA National Board Meeting and Capitol Hill visit. The Lead Plaintiff's taxi from Dulles Airport was halted on Constitution Avenue west of 15th Street, soon after passing the White House, for the Vice President's motorcade enroute west from Capitol Hill toward the White House or Naval Observatory in late afternoon as Lead Plaintiff traveled to his hotel a few blocks south of the Capitol in Washington, DC. During this visit, Lead Plaintiff was part of a group which toured the West Wing of the White House one evening and has his picture taken at the Press Room podium.

J. On this 2001 visit, the Lead Plaintiff spent an surprisingly long 90 minutes with Representative Jennifer Dunn (the Washington Eighth District Republican Congressperson who represented Lead Plaintiff's congressional district and was close to the President) in a House office building television studio - which was set up to look like a typical Congressional outer office but had television studio lighting and an interview style conference set-up in what is typically expected to be the representative's inner office. The normal ten-to fifteen minute sessions with Representatives and Senators for ordinary constituents can take months of waiting to hit a scheduled date and then are subject to cancellation, when committee and floor votes occur, whereupon a staff member typically takes the Representative's place, or the meeting must be rescheduled. As an aide sat nearby, Representative Dunn and the Lead Plaintiff discussed higher education policy and the Lead Plaintiff's policy related report and work with the Washington State Legislature, Governor, universities, colleges, and AeA's private sector members, including Intel, Microsoft, Motorola, Hewlett-Packard, and others during that 90 minute session, used by defendant FAUCI and team in establishing a psychological baseline for their next destructive sequence, through the illegal Allegent, LLC bad check and sales frauds

financial wrecking, separation and divorce of the fraudulently orchestrated marriage to Jeanette (*Third* Amendment violation), coercive psychological and illegal BRMT biochemical torture to suicide ideation, and eventual human trafficking sequence to Boston, MA in 2005, paragraphs 19(iv), 225, 457-462, 499-500.

K. In Summer 2001, CNA was requested by Berger ABAM Engineering, Inc., a Naval Facilities Command regional office (NAVFAC, NAVY) contractor to perform an indefinite quantity engineering study at Puget Sound Naval Shipyard (PSNS), Bremerton, WA, to repurpose and redeploy engineering and maintenance spaces in several dockside buildings at this nuclear submarine and aircraft carrier heavy maintenance and decommissioning facility. This project was placed on hold immediately after the 9/11/2001 attack on the World Trade Center, Pentagon, and in Shanksville, PA.

L. When the project resumed in Spring 2002, the Lead Plaintiff and one other CNA employee (Darrell PRAY, then not known to Lead Plaintiff as a federal undercover agent) were escorted through the approximately six to seven buildings to be studied in the 1.48 mile long shipyard docks area. On a typical weekday, the shipyard employs about 15,000 people. On this regular workday, not a federal holiday, there were about two dozen total employees in the entire dockside industrial shops complex. This is one example of a now well understood pattern of vacated facilities used by defendants FBI and CIA in this decades long sequence of national security deliberate entanglements across decades, intended to preserve defendants' deniability and their version of events due as the only plausible narrative (whether accurate or not), due to a complete lack of public witnesses to these entrapment attempts.



M. During this detailed hours-long tour, Lead Plaintiff was left standing beside a highly classified nuclear submarine pump (highly classified because it is an exotically engineered pump essential to the silent running of submarines) sitting on a wooden pallet covered by a green tarp. The pump was completely out of place, sitting on the floor in an engineering building which had absolutely no tooling or machine tools which would be used to repair or maintain such a pump (this building housed a giant lathe used to balance massive surface ship drivelines which transfer power to propellers from the ship's engines. The PSNS tour leader was most likely a key illegal BRMT program operative known to the Lead Plaintiff long before these events (plausibly fka as Mike CUNHA, the AFROTC medical psychiatrist candidate and WSU Resident Assistant at Perham Hall in 1974) and long after these events (plausibly known as David Keller, LIBERTY WEST, as Arizona EB-5 financier, still later as Mark GROSS at DOMINICK, then again still later at Westmark Capital, both New York City boutique international investment banks).

N. Lead Plaintiff and CNA co-employee PRAY were left standing unescorted in this maintenance and engineering building for about fifteen minutes as the entire escort team of about five to six people simply walked away. Upon the return of the escort team, the tour resumed without comment or explanation. This was a deliberate major breach of security protocol in a secure U.S. NAVY facility handling nuclear materials and classified technologies, and with sand-bagged gun emplacements protecting its submarine pens. The Marine Corps detachment which guards this facility was on heightened alert status after the 9/11/2001 attack and did and does have shoot-to-kill authorization to protect sensitive and classified technology, nuclear fuels, and other sensitive equipment and materials, as needed.

O. This PSNS tour was undertaken a few months after Lead Plaintiff had visited New York City at the same time (though in different locations) as President Bush. During that November 2001 visit, Lead Plaintiff visited the 9/11 World Trade Center family viewing platform one afternoon as recovery work was underway and as the workforce stopped periodically to honor the dead as they were removed.

P. Lead Plaintiff also had extensive interaction with an internationally deployed US commercial cover CIA intelligence asset while that individual was working in a domestic cover assignment at Media Arts Group, San Jose, California before redeploying back to Asia. Lead Plaintiff led a CNA engineering project for Media Arts Group to relocate their production and distribution operations from San Jose, CA to Morgan Hill, CA. This was similar to Lead Plaintiff's experiences with other defendant CIA commercial cover assets dating back to the 1980s, including, without limitation, STONE, Bannon, THORPE, Zoulas, Treadway, the UK's Astengo embedded at Westin Seattle in 1983, and others.

Q. CNA Industrial Engineering, Inc., operations were reportedly terminated by its "founder" Larry R. Cook (FAUCI) around 2003, after the Lead Plaintiff's departure, just as Pacific Pipeline had been in the years before. This enterprise destruction pattern is a now familiar theme to the Lead Plaintiff as a result of the forensic reverse engineering undertaken since mid-2021 and the individual identifications which began to clearly link the corrupt and illegal practices together most clearly beginning in September 2023. These particular patterns of corrupt practice abuse the federal bankruptcy courts to destroy business records periodically as the cover enterprise is financially wrecked. Alternatively, defendant DOJ and federal departments and agencies use the passage of time, asset sales, and common records destruction practices to eliminate historical financial and other records, which would otherwise be used to inculcate defendants DOJ, FBI, CIA, USMS, and other participating departments and agencies, in these illegal general searches, in these criminal acts, and in these associated-in-fact enterprise patterns of racketeering acts and conspiracies against targeted persons and their constitutional rights including, without limitation, religion, speech, property, and other rights. The overarching intent of all these techniques is to evade future discovery, such as through this type of civil litigation and through criminal appeals, of illegal search methods commonly used in general searches by defendants' cover companies, by embedding agents in positions in private enterprises, and by co-opting management of private enterprises and cooperatives such as PCC, CENEX, Associated Grocers, and other cooperatives, which illegal methods have long been common methods of illegal domestic spying. Evidence tampering, blocking, and outright technical deletion are also commonplace techniques illegally used by these agencies to fraudulently conceal inculpatory evidence - paragraphs 635, 636, 637 RGTS-15-17; 645, 646,

647, 669, 670, 693 RICO-7-9, 31-32, 55; and LPEE 11708-11925, comprise a non-exhaustive set of examples.

R. An affiliated company, CNA Architecture, was spun out of CNA as Collins Woerman through much manufactured drama (sturm und drang) during the Lead Plaintiff's tenure and continued to operate long after the demise of CNA Industrial Engineering. That firm engaged primarily in the architectural design of health care facilities in and around Seattle, Washington. Its current status is unknown.

S. Defendant Anthony FAUCI operated as the program executive for the illegal BRMT bioweapon and bioweapon delivery system as it evolved from its crude hormone hijacking form toward a more science and technology based illegal bioweapon which used a locally deployed device by exploiting medical, neuroscience, psychological, and technological advances, to modernize the illegal bioweapon used on unwitting human subjects and in secret offensive operations against other nations' leadership targets, and in its evolution from a local device toward remote platform deployment with precision ground correction, in the middle 1990s into the 2000s.

T. Defendant FAUCI was specifically identified by Lead Plaintiff in February 2024 as Larry R. Cook (Cook), the alleged founder of CNA Industrial Engineering and CNA Architecture in Bellevue, WA. He also allegedly controlled CNA Manufacturing, another local cover company used in illegal spying in aerospace manufacturing (primarily at Gulfstream, the private jet manufacturer) which was located some in Woodinville, WA, and explained as his primary work location during his prolonged absences from the Bellevue, WA CNA location. David Brown, and later Joseph Holden actually supervised day-to-day CNA Industrial

Engineering onsite operations during much of the Lead Plaintiff's tenure, both as supposed subordinates reporting to Lead Plaintiff.

U. Defendant FAUCI, as Larry Cook, appeared in person to the unwitting Lead Plaintiff between 1996-2002 for a few hours at a time every few weeks to few months, and through periodic phone calls and emails. He primarily played a "man behind the curtain" role and operated in meetings and events which ranged from direct one-on-one conversations to various confrontations about business matters, and at often lavish holiday events, funded by both private sector revenue from undercutting legitimate competitor pricing on projects and the subsideis disguised as loans from shadow banking system cover bank Banner Bank Bothell, where the unwitting Lead Plaintiff's unwitting uncle Bruce was employed during most of this same time period. Defendant FAUCI's direct and specific interactions with the Lead Plaintiff included, without limitation:

In Personal Matters Related To Lead Plaintiff's Involuntary Servitude

- (i) FAUCI staged various elaborately staged company Christmas parties most early years,
- (ii) FAUCI staged company Christmas lunches in later years,
- (iii) FAUCI staged a Christmas party conversation with Lead Plaintiff's BURNS fraudulently orchestrated (and disguised enlisted military under deferred prosecution) spouse Jeanette about a toy soldier collection in a staged Woodinville, WA mansion one Christmas which few recognizable people attended, none from CNA Industrial Engineering recollected,
- (iv) FAUCI staged tear-jerker emotional talks about his wife Jody and her health while affecting deep emotion, during which Lead Plaintiff was also BRMT hijacked to tears,
- (v) FAUCI staged drove a newly leased Jaguar at all times during his appearances,

(vi) FAUCI was allegedly a Mormon elder in the Bellevue/Woodinville, WA area stake who occasionally discussed his supposed work as a church elder (which recollects BREYER as fraudulent church elder Snow when Lead Plaintiff's sister Sandra was murdered, paragraph 99d).

In CNA Industrial Engineering Company Related To Lead Plaintiff's Involuntary Servitude

(vii) FAUCI met Lead Plaintiff briefly for first time in November or December 1996 when Lead Plaintiff was first trafficked to join CNA by Hadjinian while CNA was at the staged Carillon Point office site in Kirkland, WA, before moving to its location in Bellevue, WA,

(viii) FAUCI continually drained about \$150,000 per year from the company without doing any work at the company,

(ix) FAUCI frequently told Lead Plaintiff not to be concerned about cash stripping and losses as he had a special relationship with Banner Bank in Bothell (forensically reverse engineered as a fake cover bank used to deploy appropriated funds to cover illegal company operations which incurred losses on operations while undercutting private sector pricing as CNA competed with actual commercial enterprises for certain business opportunities used for illegal DOJ/FBI/USMS spying and surveillance operations), and as the employment location of Lead Plaintiff's uncle Bruce, also employed in involuntary servitude,

(x) FAUCI allegedly worked primarily to rescue his CNA Manufacturing company in Woodinville, WA, which had an air-based tooling jig used in aerospace manufacturing at Gulfstream, the private jet manufacturer,

- (xi) FAUCI supposedly worked in the background on the national security project USAF/Boeing Delta IV rocket factory, as CNA had before Lead Plaintiff was employed on other military, aerospace, and “Japanese Miracle” companies as they entered the US including Sony, Sega, Nintendo, Pioneer,
- (xii) FAUCI facilitated company overstaffing by Hadjinian lead shortly before Lead Plaintiff was tasked with unlikely necessity of dozens of employee layoffs (actually rotations to new illegal assignments as embeds in commercial enterprises where they could illegally spy on and sabotage other people and enterprises),
- (xiii) FAUCI staged the fake failed rescue of a Titleist Golf distribution system software project where embed Tim Auld went to work at Fortune Brands to strip about \$100,000 from the company to make the financial recovery Lead Plaintiff was tasked with accomplishing more difficult,
- (xiv) FAUCI staged a faked control fight with Collins and Woerman during the supposed spinoff of CNA Architecture, another illegal DOJ spying operation,
- (xv) FAUCI staged a theatrical crying performance with a long employed industrial engineer then being laid off by Lead Plaintiff at CNA out of financial necessity, who later infiltrated the Microsoft X-box platform program,
- (xvi) FAUCI stripped money from the company by making a promise to indefinitely support that engineer during his extended job search,
- (xvii) FAUCI staged a completely clueless faked sales pitch to the supposed HomeGrocer (HG) Board of Directors including the former COO of FedEx (to Smith) as investor, gave feedback to Lead Plaintiff on discussions with HG CEO Terry Drayton at the Irvine, CA distribution center project site which was less than positive, as Lead

Plaintiff was trying to be realistic with HG CEO about local public permitting and inspection processes during HG's rapid geographic expansion,

(xviii) FAUCI expressed strong disappointment in the HomeGrocer arbitration outcome (a valid \$500,000 arbitration claim netted \$250,000 in previously withheld account receivables, which was also used to financially distress CNA and thereby the Lead Plaintiff who was forced to reduce his personal income to help save the company and was a still continuing involuntary servant in the on-going illegal employment operations of defendant DOJ and its police powers agencies),

(xix) FAUCI strongly suggested the company move to focus on security immediately after the 9/11 attack (obviously knowing the actual nature of the illegal cover company's operations which the unwitting Lead Plaintiff did not understand),

(xx) FAUCI and others at CNA worked with embedded undercover police powers personnel and police powers personnel in other locations, such as southern California (where the Rapistan sales team incorporated and was led by defendant FBI illegal embeds) both to stall projects and to present only projects of captive interest (such as the illegal FBI spying operation at Nikken in Irvine, CA with its Rapistan package tracking sorter used to illegally capture shipping information for tracking to independent individual multi-level marketing sales persons) as distribution systems engineering project opportunities,

(xxi) FAUCI stripped cash to force staff compensation cuts (which actually only impacted the unwitting Lead Plaintiff as a captive of this illegal cover company, all other personnel were actually federal undercover police powers personnel assigned from

defendants USMS, FBA, CIA, ARMY and other undercover government positions and stall either temporarily or long term),

(xxii) FAUCI allegedly killed embedded agent/engineer Art Thompson's alleged independent Utah Alcohol Beverage Control post design engineering proposal, supposedly made outside of CNA after this project was lost to another company due to CNA missing the bid deadline, after an extreme cash flow problem caused by asset stripping and project delays forced Lead Plaintiff to temporarily layoff core team member Art Thompson, who was the lead engineer and project manager on the USAF/Boeing Delta IV project,

(xxiii) FAUCI stripped \$100,000 of badly needed cash for company payrolls from CNA in a telephone conversation with Lead Plaintiff shortly before the national security PSNS facilities reengineering project was to be started in late Summer 2002, making it financially impossible for CNA to conduct the project and to meet the company's essential payroll and payroll tax obligations during the project.

After CNA Employment In Legal Matters Related To Lead Plaintiff's Involuntary Servitude

U. Due to this PSNS time period imposed financial duress, Lead Plaintiff resigned in a facsimile message to Cook (defendant FAUCI) sent to CNA Manufacturing on the Friday afternoon before Labor Day 2002, after determining that conduct of the PSNS subcontract engineering study was not financially possible due to FAUCI's (Cook) immediate prior cash stripping (this specific operation has been determined during forensic reengineering to be a 941 federal employment tax entrapment on a national security project – an FBI ROSENBERG

operational signature form of entrapment, repeated by defendant FBI in slightly different form in 2018-2023 in Edgewater, NJ, paragraph 648 RICO-10), whereupon

(xxiv) FAUCI (a) legally maneuvered to stall the King County Superior Court compensation theft case (paragraph 641 RICO-3) for many months by changing lawyers, adding about 8 months delay and additional financial distress, which (see the specific continuation of this a, b, c sequence below),

In Post 9/11 High Intensity Illegal BRMT, Coercive Psychological Operations, Torture and Suicide Ideation Related To Lead Plaintiff's Involuntary Servitude

(xxv) legal maneuvering which delayed the six-figure CNA compensation case and added further personal financial stress during (b) the simultaneous DOJ/FBI/USMS financial wrecking of Allegent, LLC, the interstate consulting company which Lead Plaintiff had formed with illegal DOJ embed PRAY following CNA, (wherein defendant DOJ's CALDWELL appeared in an effort to discourage intellectual property litigation against ShipNow, another illegal FBI cover company which had conducted the check frauds and intellectual property theft, actually just part of an overall set of racketeering frauds by defendant FBI against the targeted Lead Plaintiff), and (c) the simultaneous repeated and final marital separation from fraudulently orchestrated and embedded military spouse Jeanette which led to the divorce, and the forced sale of the 149th Street Kirkland home, which Lead Plaintiff had remodeled and expanded by 60% over the prior ten or twelve years (Interline Exhibit 14).

(xxvi) During a 14 hour arbitration, FAUCI had an apparently very friendly lunch with Allegent and Lead Plaintiff's personal counsel Michael Larson, an attorney who had

originally been referred by Conte (another FBI intelligence embedded agent long known to and trusted by unwitting Lead Plaintiff).

V. Defendant FAUCI, who Lead Plaintiff forensically identified February 2024 in the string of federal identifications which began in September 2023, thus played a key role in plain sight as the Lead Plaintiff was rolled out of CNA, into and through the financial wrecking of Allegent, LLC dba Performa, and was driven by defendant UNITED STATES through illegal BRMT bioweapon and bioweapon delivery system biochemical mental torture and simultaneous coercive psychological torture operations to a forced suicide ideation, and out of fear through a defendant FBI/ROSENBERG human trafficking sequence to Boston, MA (assisted by SUMMERS) in 2005.

W. From Boston, Lead Plaintiff was then human trafficked to northern NJ/NYC in 2007 through a defendant FBI (ROSENBERG) orchestrated Mossad interview to faked employment at defendant ESTABLISH in Fort Lee, NJ, on PPG Pittsburgh and Clipper Windpower to Carpinteria and Cedar Rapids, IA, the faked relationship with defendant MODDERMAN including the faked Pankowski wedding, all intended to retraumatize the Lead Plaintiff before the next follow-on asset stripping, financial wrecking, deprivation of benefits, theft of labor and materials, physical and metal biochemical torture to suicide ideation, psychiatric confinement to force federal civil rights litigation drop in October 2010, and the subsequent rehousing in Ramsey, NJ in March 2011. The precise timing of defendant FAUCI's exit from supervisory, management, and executive roles in this sustained illegal BRMT program operation is presently unknown.

X. Subsequent to his departure from CNA, Lead Plaintiff was skylined by this illegal secret defendant CIA and DOJ conspiracy to conceal illegal patterns of BRMT bioweapon and

bioweapon delivery system, rights violations, and associated-in-fact enterprise patterns of racketeering acts and patterns of acts, and pretexted by association through police powers front-running related to violent news reports and domestic sabotage events which were known to those police powers defendant departments and agencies far ahead of general public knowledge, and some most plausibly assigned to malign federal intelligence operations, subparagraphs 602Y and 602Z immediately below, as they were likely perpetrated from within defendant UNITED STATES and/or by corrupted criminal and intelligence assets of the UNITED STATES, acting against the broad public interest.

Y. Domestic sabotage incidents include the fully involved arson fire in Conyers, Georgia against the Bio-Lab chemical warehouse in May 2004, which generated a very large cloud of extremely poisonous phosgene and chlorine gases over this suburban and mostly Black city. This arson fire occurred within weeks after a fraudulent defendant FBI orchestrated sales call at Bio-Lab's Lawrenceville, Georgia headquarters office location with Allegent, LLC dba Performa co-owner Darrell PRAY (illegally embedded federal agent), for a meeting with the Great Lakes Chemical parent company CIO Zoe SCHUMAKER and members of the Bio-Lab information technology team (all now known to be unidentified federal officers operating undercover). Lead Plaintiff's analysis of this event sequence is at LPEE pages 766-769. An EPA report on this arson fire is producible from the public record on the EPA.gov website.

Z. The other most notable domestic sabotage event was the bird strike double engine flameout and crash of U.S. Airways Flight 1549 on January 15, 2009, which was preceded by two flights of Canadian geese over Lead Plaintiff's involuntary USMS assigned "safe house" in Cliffside Park, NJ which overlooks the Hudson River. Lead Plaintiff was human trafficked there in August 2007 by defendants ROSENBERG, ESTABLISH, FBI, and USMS. The Lead

Plaintiff saw the aircraft pass his Hudson River view living room as it was on its final glide south over the Hudson River enroute to its forced landing crash site near midtown Manhattan. Defendant CHALOM (posing as landlord and former television producer of Contact 1-2-3) closely questioned Lead Plaintiff about this incident in an unusual visit to his residence soon after the crash. Sometime in this event sequence, Lead Plaintiff experienced an illegal BRMT bioweapon and bioweapon delivery system hijack of his visual nervous system which included the image of a noiseless commercial jet aircraft to the north of his apartment over the Palisades in a literally impossible flight configuration about 500 feet above the Palisades near Fort Lee, NJ. The date of this specific BRMT hijack is not recollected but is believed by Lead Plaintiff to be the initial event in the sequence which preceded the crash, see paragraph 606B HEXP-3).

Other Relevant DOJ/FBI/USMS Trafficking and Spying 1996-2002 Known Through Lead Plaintiff's Involuntary Servitude

AA. Known defendant DOJ/FBI connections to other illegal enterprise embeds, spying, and sabotage:

- (a) As Larry Cook, defendant FAUCI also supposedly tried but was reportedly cut out from investing in Point B, a software consulting firm also used as another illegal spying platform by FBI to infiltrate Starbucks and other commercial enterprises.
- (b) CNA - Dennis last name not recollected was subcontracted from CNA to Point B in Point B's early formation years to work on a failed extended warehouse management software implementation being run by Point B.
- (c) NutraSource - Starbucks employed and then fired a former NutraSource VP Operations Dana Smith (defendant DOJ ;police powers agency embed, who had formerly worked for ROSENBERG, FBI) while he ran its Seattle roasting plant.

- (d) Rapistan - Larry Harding, Rapistan sales manager in the greater Los Angeles, CA area, was a primary source of CNA project opportunities in southern California through referrals to CUC/Davidson, Nikken, and to other site visits made in the greater Los Angeles region in the second half of the 1990s to support illegal enterprise infiltrations.
- (e) Throughout this period, defendant ROSENBERG (FBI) operated in the background at NutraSource where he had been embedded by acts of defendant WEISSMAN while at PCC in the 1980s. After the sale of NutraSource, defendant ROSENBERG allegedly invested funds with partners in a golf driving range in Gig Harbor which failed, and into a Seattle wine shop which continued in operation.

AB. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added

subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	454, 465; 604D, 606N HEXP-1, 3; 635, 636, 637 RGTS-15-17; 645, 646, 647, 669, 670, 693 RICO-7-9, 31-32, 55
Appendix 2 paragraphs:	1-020 through 1-026
LPEE Table 2 pages 12023-12120 paragraphs:	2-0003 through 2-0012, 2-0024, 2-0059, 2-0060, 2-0095, 2-0097, 2-0109, 2-0153, 2-0155, 2-0202
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 416-426, 766-769, 8294-8346, LPEEV65-17
Emails and documents by topic and date, also located in LPEE:	Not applicable

603. NSEC-4 National Security Frauds: Human Trafficking, Forced Labor, Violations of Rights – Mossad, MI-6, MI-5, London Metropolitan Police, UK 2007

A. As forensically reverse engineered, during 2007 through 2008, defendant UNITED STATES, its agents, officers, confidential informants, and other defendants, after the defendant ROSENBERG led human trafficking Lead Plaintiff from Washington state to nearly two years of homelessness in Massachusetts, then again human trafficked Lead Plaintiff to ten months of fraudulent employment in Fort Lee, NJ at ESTABLISH Inc, a logistics consulting firm domestic and international cover operation.

B. In Summer 2007, ROSENBERG orchestrated a “consulting firm” interview in western suburb of Boston, MA for Lead Plaintiff, which was actually with Mossad, the Israeli intelligence agency with expertise in terrorism and in terrorism screening, for the purpose of creating a fictional terrorism legend to be associated with the Lead Plaintiff, placing him in further physical danger from misguided police powers personnel and potentially members of the public as he was further human trafficked to northern NJ and the greater NYC area. This absurd premise, the interview with Mossad, was then spread by defendant ROSENBERG (who had

known Lead Plaintiff in his prior commercial cover in Seattle, WA for about two decades), defendants FBI, CIA, and possibly media personages including, without limitation, MELBER (formerly FBI with a direct former undercover relationship with Lead Plaintiff, paragraphs 494-501), to other defendant police powers operations and media (some previously also having had surreptitious relationships with Lead Plaintiff) in New York City and northern New Jersey, shortly before his August 2007 human trafficking to Fort Lee and Cliffside Park, NJ. This investigation was confirmed in 2021 by defendant NYPD, then immediately fraudulently concealed by NYPD and FBI, paragraph 555-562 and Interline Exhibits 17-18.

C. In September 2007, FBI's Charles ROSENBERG (while known as William Drumm, ESTABLISH General Manager of US operations) orchestrated and conspired with British intelligence and police powers organizations to human traffick Lead Plaintiff to London, United Kingdom for an ostensible week-long company international business conference, and thereby again develop pretexts (as in 1995 at PAN, see NSEC-2) for international spying on Lead Plaintiff. British intelligence and police powers operations (likely London Metropolitan Police, MI-5, and MI-6) posed at this September 2007 London meeting as international employees of defendant ESTABLISH posted at varied location in Europe, including its ostensible Swedish headquarters, and as employees in China.

D. This series of defendants' RICO frauds included police powers and media personnel posing as company executives and employee in professional police powers (and some media) roles, which facilitated color of law pretexting to permit foreign intelligence operations to "legally" engage in color of law spying upon the Lead Plaintiff in London and elsewhere in Great Britain, as well as within the United States using intelligence acquisition methods and assets which defendant UNITED STATES cannot legally deploy against its own citizens.

E. For the several months before and during this London trip, and into early 2008, defendant UNITED STATES operated primarily through William Drumm (ROSENBERG) and several other US based “employees” of ESTABLISH (including agents known as Ray KOVONUK, Piotr PREGNER, Steve MCDONALD, and Jason PANKOWSKI), and engaged other various federal, state, and local police powers and intelligence operations and assets in the greater New York City area in this corrupt color of law civil rights and racketeering pattern of acts, violations, and injuries, which continues into the present.

F. In September 2021, defendant NYPD verified and then disappeared evidence of a terror related investigation against the Lead Plaintiff (Interline Exhibits 17 and 18) surrounding the initial human trafficking, when Lead Plaintiff was met around November 2007 on his first recreational outing into New York City at the Port Authority Bus Terminal by about two dozen NYPD uniformed counter-terror squad members in bulletproof vests, helmets, and bearing submachine guns along the west side of Eighth Avenue. Together with defendant FBI’s fraudulent concealment, these acts further delayed discovery of the primary responsible defendants (FBI and CIA) for the decades long overall pattern of BRMT human experimentation and bioweapon abuse, the racketeering associated-in-fact enterprise, and their fraudulent concealment, until the September 2023 forensic breakthrough in this case described at LPEE page 12251-12261.

G. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants’ long-running schemes, frauds, and swindles to sustain defendant UNITED STATES’ involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent,

to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. Witness testimony, including direct examination of defendant UNITED STATES undercover personnel, including ROSENBERG, KOVONUK, PANKOWSKI, MCDONALD, ROSS, and others who worked at ESTABLISH, and discovery against these defendants will confirm this specific incident and the surrounding events. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	17, 18, 19
Complaint paragraphs:	494-501, 555-562, 604D, 606N HEXP-1, 3
Appendix 2 paragraphs:	1-031, 1-032
LPEE Table 2 pages 12023-12120 paragraphs:	2-0003 through 2-0012, 2-0024, 2-0059, 2-0060, 2-0095, 2-0097, 2-0109, 2-0153, 2-0155, 2-0202
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 8351-8355, 11639, LPEEV65-6, 7, 17
Emails and documents by topic and date, also located in LPEE:	Not applicable

[Intentionally left blank.]

ILLEGAL HUMAN EXPERIMENTATION (HEXP series offenses)

Biological and Medical Invasions- Torture

604. HEXP-1 Illegal Human Experimentation: BRMT Induced Torture, Washington State 2002-2005

A. As forensically reverse engineered, defendant UNITED STATES used BRMT and carefully orchestrated extremely adverse life event sequences in 1974-1977 at WSU, Pullman, WA; in 1988-1989 in Redmond, WA; and in 2002-2005 in Kirkland, WA; to disguise and enhance a series of extreme biomedical hijackings of Lead Plaintiff's brain chemistry. The most intense in this specific series occurred in 2002-2005. Stealthy, very high intensity, and long running illegal BRMT bioweapon and bioweapon delivery system hijackings of serotonin levels comparable to months and months of "Chinese Water Torture" were endured by the Lead Plaintiff, inducing periods of clinical depression, among other adverse health effects, as early as the 1970s into the 2020s. "Serotonin is a neurotransmitter and hormone that influences mood, sleep, digestion, and other body functions" (Source: Cleveland Clinic website).

B. These extreme illegal BRMT bioweapon and bioweapon delivery system brain chemistry hijackings were combined with (i) a years-long campaign of defendants' field-deployed coercive psychological operations, with (ii) the stress of a fraudulently derived relationship from 1988, subsequently manipulated and repeatedly damaged to total destruction by 2004 with Jeanette his second wife, with (iii) a total loss of income, and with (iv) multiple simultaneous litigations required in the early 2000s (*Brewer et al v. CNA*, *Allegent v. ShipNow* check fraud and *Allegent v. ShipNow* intellectual property theft litigation, paragraph 644 RICO-6) to attempt to recover various racketeering thefts, frauds, and the programmed destruction of Allegent, LLC, his small business which he unwittingly co-owned with defendant UNITED

STATES' PRAY during this period, all as described in other subcounts herein, for the benefit of defendant UNITED STATES, as perpetrated through the orchestrations and direct participation of, without limitation, defendants FAUCI, ROSENBERG, CALDWELL, MELBER, and other unknown individual defendants.

C. Defendant UNITED STATES also developed a program intended to invoke public vigilantism focused on Lead Plaintiff which its departments and agencies propagandistically used to shaped public perception by his deliberate online public exposure during this period unbeknownst to him at the time, and by an accompanying public narrative of lies and rumors pushed by these same defendants, principally defendant UNITED STATES. Together with defendants' direct manipulations, this public vigilantism created by propagandistic manipulations of the public narrative and the creation of sustained oppressive life circumstances across all dimensions of Lead Plaintiff's life, which foreclosed career and entrepreneurial choices, otherwise his to make in a free society in the absence of the false narrative created by defendant UNITED STATES (these choices were forcibly removed and were not his to make), to intimate personal relationship choices he believed were his to make (these choices were forcibly removed and were not his to make), and shaped public perceptions and direct public vigilantism, including threats of lethal violence, against the Lead Plaintiff.

D. This was an overwhelming campaign by defendant UNITED STATES and its co-conspirators directed against the Lead Plaintiff which is comparable to and worthy of any of the world's great demagogues and propagandists throughout history. Together with the serotonin hijacking using the illegal BRMT bioweapon and bioweapon delivery system, it was nearly fatal. See the full text on psychological torture at LPEEV65-17:

Torture vs Other Cruel, Inhuman, and Degrading Treatment

Is the Distinction Real or Apparent?

Metin Başoğlu, MD, PhD; Maria Livanou, PhD; Cvetana Crnobarić, MD

Context: After the reports of human rights abuses by the US military in Guantanamo Bay, Iraq, and Afghanistan, questions have been raised as to whether certain detention and interrogation procedures amount to torture.

Objective: To examine the distinction between various forms of ill treatment and torture during captivity in terms of their relative psychological impact.

Design and Setting: A cross-sectional survey was conducted with a population-based sample of survivors of torture from Sarajevo in Bosnia and Herzegovina, Banja Luka in Republica Srpska, Rijeka in Croatia, and Belgrade in Serbia.

Participants: A total of 279 survivors of torture accessed through linkage sampling in the community (Banja Luka, Sarajevo, and Rijeka) and among the members of 2 associations for war veterans and prisoners of war (Belgrade).

Main Outcome Measures: Scores on the Semi-structured Interview for Survivors of War, Exposure to Torture Scale, Structured Clinical Interview for DSM-IV, and Clinician-Administered PTSD (posttraumatic stress disorder) Scale for DSM-IV.

Results: Psychological manipulations, humiliating treatment, exposure to aversive environmental conditions, and forced stress positions showed considerable overlap with physical torture stressors in terms of associated distress and uncontrollability. In regression analyses, physical torture did not significantly relate to posttraumatic stress disorder (odds ratio, 1.41, 95% confidence interval, 0.89-2.25) or depression (odds ratio, 1.41, 95% confidence interval, 0.71-2.78). The traumatic stress impact of torture (physical or nonphysical torture and ill treatment) seemed to be determined by perceived uncontrollability and distress associated with the stressors.

Conclusions: Ill treatment during captivity, such as psychological manipulations, humiliating treatment, and forced stress positions, does not seem to be substantially different from physical torture in terms of the severity of mental suffering they cause, the underlying mechanism of traumatic stress, and their long-term psychological outcome. Thus, these procedures do amount to torture, thereby lending support to their prohibition by international law.

Arch Gen Psychiatry. 2007;64:277-285

E. Lead Plaintiff sought out his physician Paul Mayeda one day after the suicide ideation, but was met by a so-called female physician's assistant in an otherwise empty Lakeshore Clinic medical office. This had never happened before. As Lead Plaintiff left the patient examination area, the figure representing his doctor Paul Mayeda had his back turned to the Lead Plaintiff on a stool and he did not turn to greet the Lead Plaintiff – very unusual. There were no other patients nor any other personnel than one receptionist, the physician's assistant, and the white coat male figure on the stool, observed in this entire normally moderately busy 2 story multi-doctor Lakeshore Medical Clinic facility near Evergreen Hospital, Kirkland, WA. A prescription

for paroxetine (Paxil, an SSRI, antidepressant) was entered and used to relieve the BRMT induced serotonin overdose.

F. Defendant UNITED STATES has since actively conspired to conceal its medical acts by destroying the Lead Plaintiff's personal medical records through the passage of time. After human trafficking the Lead Plaintiff through programmed destruction in Washington, through homelessness in Massachusetts, then to fraudulent employment in New Jersey, these essential medical records from about 1990 to 2005 were not sent to the Lead Plaintiff in 2007 despite his written request sent by US Mail to his Kirkland, Washington primary care physician.

G. This form of evidence suppression and destruction is a common pattern of practice of defendant UNITED STATES, as documented elsewhere throughout this Complaint. Lead Plaintiff's own father was a medical practice examination room paper salesperson between about 1960 and 1963. He routinely bought expired x-rays for recycling by his employer from medical practices in northern and southern California which sales targets were specifically assigned by his employer, Pacific Paper Products, Tacoma, Washington. This was a defendant FBI cover operation to cover its illegal tracks and suppress evidence of criminal violence during Cointelpro, a violent felony-filled campaign against civil rights activists and others, which was in full violent operation at the time. When Lead Plaintiff's father was asked to undertake the same pattern in Texas, he quit the company and returned to Washington state with his young family (paragraph 414-418).

H. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT

development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	414-418, 606N HEXP-3, 644 RICO-6
Appendix 2 paragraphs:	1-013, 1-014, 1-015, 1-023, 1-062
LPEE Table 2 pages 12023-12120 paragraphs:	2-0003 through 2-0006, 2-0015
LPEE pages (see technical note on page numbering at paragraph 230):	1 et al, 140 et al, 371, 575-597, 9679-9696, 10372, LPEEV65-1, 17
Emails and documents by topic and date, also located in LPEE:	Not applicable

I. These schemes and conspiracy in the illegal human experimentation (HEXP) series required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment;

illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	13, 14, 16-18
Complaint paragraphs:	10, 99, 61-67, 226 table, 308-311, 320e, 332-341, 357-399, 414-418, 419-584; 600H, 602, 603B, F, G, L NSEC-1, 3, 4; 604, 605, 606, 608, 609C, 613, 615-619 HEXP-1-3, 5, 6, 10, 12-16; 621 626, 629, 630 RGTS-1, 6, 9, 10; 634C RGTS-14, 641 642 644 648, 649, 650B(i), 651D, 653, 656 683 RICO-3, 4, 6, 10, 11, 12, 13, 15, 18, 45; 802B, 821, 839, 842B(ii); Appendix 1 – Prior Filings History
Appendix 2 paragraphs:	Entirety
LPEE Table 2 pages 12023-12120 paragraphs:	Entirety
LPEE pages (see technical note on page numbering at paragraph 230):	1 et al, 140 et al, 368-793, 7467-8179 (2014-2018), 2023 Financial Times photo confirmation of identity at 7470-7470A, 8233-8262, 8263-8287, 8347-8350; 9679-9696, 10256-10258, 10306-10310, 10335-10342, 10346-10351, 10365-10375, 10372, 10394-10422, 10428, 11653-11654, 11668, 12129 (third paragraph), 12121-12149, 12150-12159, LPEEV65-1, 3, 5, 6, 7, 17
Emails and documents by topic and date, also located in LPEE:	Hurd Pine Street Inn update 110419.pdf Bergen Regional Sinisi re resume and cover ltr 101230 D Brewer Marriage Cert May 5 1984 Lynne 840505.pdf D Brewer Marriage Cert May 5 1984 Lynne 840505.pdf

	D Brewer Marriage App Jeanette 1990 900330.pdf D Brewer Marriage App Jeanette 1990 900330.pdf Jeanette Timeline 1 061001.pdf Jeanette Timeline 2 061001.pdf Jeanette Timeline 3 061001.pdf Jeanette timeline email 061001.pdf Match Group Second Notice re Preserve Evidence 220122, Match EPL Response 221110, Match Group Legal Dept Email 221110, MODDERMAN email re PANKOWSKI wedding Drumm attends 080625, MODDERMAN email re PANKOWSKI wedding Drumm attends 312pm 080625, MODDERMAN re wedding 080626, MODDERMAN email re PANKOWSKI wedding Drumm attends 817am 080627 AKOTO re AltaVista bad actor 161018, AKOTO re BLACKPOOL then DD 170315, AKOTO Laura re \$2K to Mr Prince from Porter Patten \$3K 171021, AKOTO Hints of money laundering entrap scam 171025, AKOTO Ramsey Fixup Expenses 171027 AKOTO Mailing Address 150101.pdf Gia first date 211207 (note actual date was in 2019) Match Group Second Notice re Preserve Evidence 220122, Match EPL Response 221110, Match Group Legal Dept Email 221110 New York Cares Library Bowling Outing 080815 Certain emails are blocked by a defendant UNITED STATES computer hack
--	--

605. *HEXP-2 Illegal Human Experimentation: BRMT Induced Torture And Psychological Operations, Massachusetts 2006-2007*

A. As forensically reverse engineered, during 2006-2007, defendant UNITED STATES again used the illegal BRMT bioweapon and bioweapon delivery system and defendants’ carefully orchestrated life event sequences to disguise and sustain a series of biomedical hijackings of Lead Plaintiff’s brain chemistry. This combination of stealthy high frequency hijackings (comparable to “Chinese Water Torture”); long duration extreme daily headaches and

severe vision impairment for protracted periods of extreme duress; and BRMT hijacked adrenaline levels induced hypersensitivity to certain sounds (such as the crinkling of plastic bags) which were employed each night in a public shelter by Lead Plaintiff's nearby minders while he was homeless. These acts, together with occasional "fights" among the "homeless residents" which included a rotating security detail at Dorchester Heights Catholic Church basement where most of this period was spent by the then unwitting Lead Plaintiff, and the drug and alcohol abuse induced collapses of consciousness which lead to concussions among the actual homeless residents at Pine Street Inn, and the destruction of his eyeglasses during which period he could not see clearly for about ten days as replacements had to be paid and manufactured, worked together with other illegal BRMT bioweapon and bioweapon delivery system imposed symptoms to amplify this emotional anxiety.

B. The October 31, 2017 symptoms identified at LETHL-9 were experienced daily with extreme pain and blurred vision for approximately 12 of the 17 months spent in the Pine Street Inn homeless shelter system in Boston, MA between about April 2006 and August 2007. This daily extreme head pain and blurred vision recurred each morning as Lead Plaintiff left the Dorchester Heights satellite shelter location, rode a 12 passenger van to the Pine Street Inn, then walked to the Boston Public Library where he spent most days reading. Despite the extreme pain, he was required to keep his eyes open and focused on reading material so the circulating security guard would not order him to leave the premises because he was not actively reading or had his eyes closed as the extreme headache and blurred continued for about 90 to 120 minutes each day. A further 60 minutes or so was required to fully recover from the pain and blurred vision. At one point, his eyeglasses were crushed and he was unable to see clearly for about ten

days, but necessarily had to focus on books to avoid being removed from the shelter of the library, described at subparagraph E below.

C. Identical extreme headache symptoms recurred in Cliffside Park, NJ, in 2008-2010 each morning soon after he returned to his apartment from the Edgewater, NJ Starbucks coffee shop he went to each day. These symptoms consistently recurred in connection with these same event sequences each morning, and abruptly appeared and months later abruptly disappeared with no clear medical explanation. These symptoms also directly correlate with extreme headaches and blurry vision experienced on occasion for a few days during 2021 and 2022 at his Edgewater, NJ apartment. A neurological examination in Boston, MA, in 2007, and MRI brain scans in New Jersey at Bergen Regional Medical Center hospital in 2010, and Palisades Medical Center hospital in 2021, provided no medical explanation for these symptoms or for the long-duration episodes of recurrence and abrupt disappearances. The illegal BRMT bioweapon and bioweapon delivery system imposed these torturous symptoms, effectively 90 to 120 minute daily periods of direct torture imposed remotely and triggered by operators with knowledge of Lead Plaintiff's schedule.

D. In late June 2006, one of Lead Plaintiff's minders left a single broadsheet page (four pages of newspaper content on a single sheet as printed) of the Boston Globe newspaper carefully folded to that story on the end table next to the Dorchester Heights shelter common room couch on which Lead Plaintiff normally watched the evening news. The folded section face up on adjacent coffee table contained an article about the suicide of Denise Denton, then Chancellor of the University of California at Santa Cruz. Lead Plaintiff quickly noticed this announcement about Chancellor Denton, who jumped to her death from her 33rd floor high rise apartment in San Francisco which she shared with her female partner. She had previously been

the Dean of the College of Engineering at the University of Washington in Seattle, WA, and had invited the Lead Plaintiff to join the College's Board of Advisors, which met periodically to advise Dean Denton.

E. These psychological operations, also included, without limitation, (i) the above reminder of his own previous suicide ideation in Kirkland, WA (paragraph 604 HEXP-1), (ii) the theft and destruction of Lead Plaintiff's eyeglasses from his locker at Pine Street Inn while he was showering each morning, which were then crushed beyond use and left on a sidewalk he used each day to reach the Boston Public Library on the day after the theft, and (iii) his left big toe which was abraded with a file so it split down the middle during deep sleep which can be easily secured by a BRMT brain hijack, and then had to be ripped out of the nail bed piece by piece with surgical pliers at the local hospital so it could regrow properly.

F. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their

children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

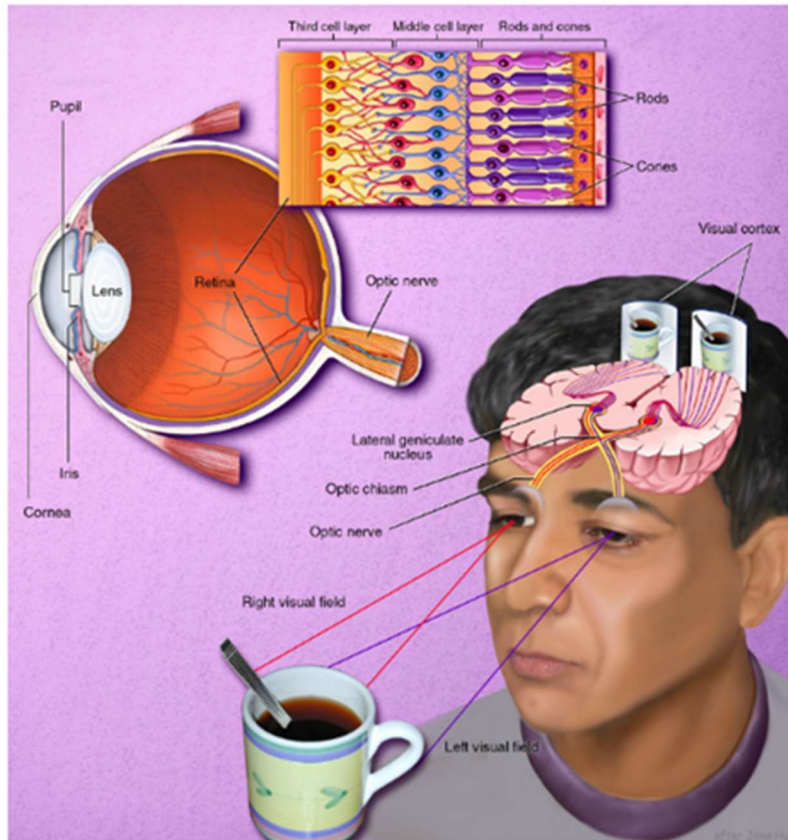
Interline Exhibits:	Not applicable
Complaint paragraphs:	604 HEXP-1, 606N HEXP-3
Appendix 2 paragraphs:	1-030
LPEE Table 2 pages 12023-12120 paragraphs:	2-0125, 2-0150
LPEE pages (see technical note on page numbering at paragraph 230):	10306-10310, LPEEV65-17
Emails and documents by topic and date, also located in LPEE:	Hurd Pine Street Inn update 110419.pdf

606. *HEXP-3 Illegal Human Experimentation: BRMT Induced Torture And Psychological Operations, New Jersey 2008-2011*

A. As forensically reverse engineered, during the second half of 2008 through early 2011, defendant UNITED STATES used the illegal BRMT bioweapon and bioweapon delivery system and defendants’ carefully orchestrated life event sequences to disguise and sustain a series of biomedical hijackings of Lead Plaintiff’s brain chemistry. The methods used by defendant UNITED STATES, and its defendant police powers co-conspirators and private sector co-conspirators during this period were even more extreme than previously experienced. Illegal BRMT imposed brain chemistry and physical hijackings of brain, central nervous system and muscles was particularly extreme, severe, and of long duration, leading to Lead Plaintiff to repeatedly cry out in pain and suffering (which he had not done in any previous months-long sequence) imposed by defendant UNITED STATES use of BRMT. These illegal BRMT bioweapon and bioweapon delivery system hijackings continued to be combined with the

coercive field-deployed psychological operations routinely used by defendants to influence a variety of Lead Plaintiff's personal decisions.

B. In late 2008 and the first few days of 2009, the Cliffside Park apartment events sequence included two flights of Canadian Geese which flew about ten feet above the building's parapet. The same birds would cause the January 15, 2009 dual engine flame-out of US Airways Flight 1549 as two formations of the birds were ingested into the intakes of both jet engines. Lead Plaintiff stood at the same top floor living room window to witness this event as he had in those preceding weeks when the two flights of geese had passed his living room window. He also experienced a BRMT imposed visual grayscale image on his visual cortex (the brain's vision processing center, see illustration below). The aircraft was in a very unusual slow flight condition and was completely silent when it necessarily would have been in full power slow flight mode. An actual aircraft of this type and size would not have legally been able to operate in this manner, nor in the almost impossible aircraft structural and aerodynamic configuration it supposedly operated a few hundred feet above the Palisades over Fort Lee, NJ, directly north of his Cliffside Park, NJ apartment. During forensic analysis of tradecraft patterns undertaken by the Lead Plaintiff in 2021-2022, it became apparent that these tradecraft signals (Canadian Geese sightings) and illegal BRMT hijackings (the out of position jet image over Fort Lee, NJ and the Palisades), clearly indicated foreknowledge and planning of the US Airways Flight 1549 Hudson River emergency landing which Lead Plaintiff witnessed on January 15, 2009 from the Cliffside Park apartment living room window.



C. The US Airways Flight 1549 emergency water ditching on the Hudson River occurred five days before the Presidential inauguration on January 20, 2009. An earlier Conyers, GA Bio-Lab arson fire in May 2004 had occurred about five and one-half months before the 2004 Presidential election, and a few weeks after a fraudulent “sales appointment” with defendant UNITED STATES (Zoe SCHUMAKER who also possibly posed at other times as Phyllis PRAY, Darrell PRAY, and others in a “Bio-Lab” conference room in Lawrenceville, GA for an alleged IT project, which was an element of the surreptitious programmed destruction of Allegent, LLC, (paragraph 602 NSEC-3), and in records handed to defendant ROSENBERG (FBI, paragraph 462), an element of the pattern of precursor events by defendant FBI (ROSENBERG) human trafficking to eliminate the 2005 FTCA claim from consideration, and human traffick Lead Plaintiff from Kirkland, WA to Boston, MA and homelessness in

December 2005. Several years earlier, Lead Plaintiff had earlier visited the White House West Wing during an AeA trade association (formerly American Electronics Association, representing Microsoft, Hewlett-Packard, Intel, Motorola, and other technology companies) Board meeting in May. While at the White House, a USSS agent pulled a hatch cover in an aisle and he was shown an old swimming pool which was under the Press Room wherein his picture below was taken at the podium by another USSS agent, and later mailed to Lead Plaintiff by AeA Executive Director Bill Archey.



D. Based upon forensic analysis of tradecraft by Lead Plaintiff, both events' tradecraft (Bio-Lab meetings and Canadian Geese (preceding Flight 1549), and the related BRMT visual cortex jet aircraft imagery described paragraph B above, were and are indicative of national security related willful domestic sabotage, which was almost certainly internally known in advance and the US Airways Flight 1549 internal sabotage event was deliberately signaled to him in advance by elements of defendant UNITED STATES, as they intended and did engage in knowing and willful domestic sabotage.

E. This early 2009 aircraft ditching was followed by a brief out of place sighting, likely in the few months of 2009 soon after an Obama visit to NYC, wherein the “Beast” Presidential limousine was driven by the Lead Plaintiff’s Cliffside Park NJ apartment as he stood at his kitchen window looking down onto Palisade Avenue, a kitchen window he rarely visited as he spent his daylight hours almost exclusively in his living room area.

F. A combination of stealthy high frequency illegal BRMT bioweapon and bioweapon delivery system brain hijackings including brain chemistry hacking, a long-running repeat of the series of the Boston extreme headache series (paragraph 605 HEXP-2) comparable to a severe recurring form of “Chinese Water Torture,” with the addition of intense physical cramping symptoms and other body manipulations and malfunctions, comprised a protracted pattern of extreme duress and biochemical torture, with newly added physical torture, over many months of 2009 into 2010. These extremely coercive circumstances led directly to Lead Plaintiff’s second suicide ideation at the southeast corner of Thompson Lane, Edgewater, NJ, during a return trip from his typical morning Starbucks coffee and newspaper reading visit at Edgewater Commons, where he was blocked from entering active on-coming street traffic by two pedestrians standing on that street corner blocking his path.

G. Somewhere during this period, Landlord CHALOM (USMS) visited the apartment and reported the removal of a “terror suspect” from the premises by FBI for deportation proceedings. Lead Plaintiff pursued a civil rights claim, preparing it over months in Spring 2010 still not recognizing he was in an USMS “safe” house run by CHALOM at that moment. The case was docketed on June 23, 2010, a federal district court complaint (Newark, case number 10-3204 (SDW)), never acted upon by the district court judge it was assigned to as legally required under 28 U.S.C. § 1915. Lead Plaintiff was notified of his ejection from the monthly

rental as of August 30, 2010 by landlord CHALOM (USMS) in July 2010, and was later forced to leave his Cliffside Park, NJ apartment on October 1, 2010 after a thirty day overstay.

H. Shortly before his forced departure from this Cliffside Park, NJ apartment on October 1, 2010, he experienced three aural messages delivered from behind one afternoon which appeared as aural hallucinations from the “United States Secret Service” (defendant USSS) instructing him to descend to the building’s basement and hide, a behavior which was witnessed by two female undercover agents standing at the doorway of the apartment immediately below his apartment. These agents were most probably defendant USSS personnel temporarily at this location in this Cliffside Park USMS “safe” house.

I. On October 1, 2010, Lead Plaintiff traveled to Hackensack, NJ to a defendant BERGEN COUNTY homeless shelter and was sent on to a non-existent BERGEN COUNTY daily shelter at a non-existent address nearby, walked to and was referred by Hackensack Police to a South Hackensack budget motel where he was aggressively BRMT hijacked overnight, called 911 the following morning, and was then contacted by a South Hackensack, NJ Police officer and ambulance, transported to, and kidnapped into Bergen Regional Medical Center on October 2, 2010, about 100 days after that federal court filing was made (paragraph 808).

J. This involuntary commitment on October 2, 2010 occurred while Lead Plaintiff sat in the emergency room of Bergen Regional Medical Center for about 12 hours, before being wheeled to a locked psychiatric ward, and was told about five days later by his “counsel” he had been ordered involuntarily committed for fourteen days. The lack of any actual NJ state law compliant court procedure is discussed at paragraph 808.

K. The ejection from Cliffside Park, NJ housing mimicked the prior ejection in 2005, about 100 days after hand delivering an FTCA claim to Washington, DC, in September 2005,

where he had traveled soon after that FTCA claim had not been delivered by either USPS or FedEx while he resided in Kirkland, WA.

L. This event sequence was not understood by Lead Plaintiff until after the 2021 forensic analysis was started, whereupon the Flight 1549 circumstances and other related events were reported as they became more clearly understood to the US Attorney for SDNY in December 2021 (LPEE pages 368-793, LPEEV65-11-16). Explicit identifications which facilitated the institutional defendant connections were not yet understood at that time but have become much more apparent since other identifications were able to be made beginning in Summer 2023. All letters, hand delivered, have been met with total silence from SDNY (DOJ), just like all prior communications from Lead Plaintiff to federal police powers and intelligence personnel. The kidnapping sequence was not apparent until the failure to comply with state law was made clear during a forensic review of the hospital admittance process lack of legal compliance was discovered in April 2024 and led to the addition of the kidnapping count to this series of complaint drafts. Defendant UNITED STATES has and does engage in direct acts of fraudulent concealment and a classic surreptitious whistleblower war against Lead Plaintiff (and others in this class), at least since defendant ROSENBERG (FBI) began the process in the early 2000s soon after the September 11, 2001 attacks using newly expanded powers to drag the Lead Plaintiff from national security entanglements into the terrorism space as acknowledged by defendant NYPD at Interline Exhibit 17. Apparently praying in a home church led by fraudulent church infiltrator BREYER, working, babysitting, and socializing with these defendant UNITED STATES personnel, and with other undercover USMS and CIA personnel, among others, from high school age forward (BREYER's "Snow family" children and "Sackville-West family" children, paragraphs 99b, 226 table, 421, 492-493, 501), babysitting FBI and ARMY personnel

children from the 1980s into the 1990s (including children of RUBIN, MELBER, and both VINDMANs), a complete lack of any adverse contacts with police powers while he was unwittingly in their presence almost constantly since high school (KATYAL and others, paragraph 99), and being assigned his fraudulent second spouse Jeanette by them in direct violation of the *Third* Amendment (BURNS, WATERS, paragraph 494), enduring enterprise destruction, property theft, illegal biomedical experiments and torture, among other associated-in-fact enterprise acts, violations, and injuries recounted herein, was insufficient to persuade these defendant UNITED STATES agencies of the Lead Plaintiff's character and conduct, so they have and do feel compelled to continue, without limitation, their sweeping violations of constitutional rights, illegal BRMT bioweapon human subject biomedical abuses, lethality attempts, and other patterns of racketeering acts, violations and injuries, as they perpetuate their associated-in-fact enterprise to sustain involuntary servitude in systematic violations of the *Thirteenth* Amendment, ratified in 1865, from the early 1960s to the present day.

M. Defendants have and do continue other coercive psychological operations, and public vigilantism inspired by defendants, and have and do create and sustain oppressive life circumstances across all dimensions of Lead Plaintiff's life, from career and entrepreneurial choices and outcomes, to intimate personal relationships, to illegal BRMT bioweapon brain hijacking, and continuing efforts to shape public perceptions and direct public vigilantism, including by multiple threats of violence and coercion to and including lethal violence attempts directed at Lead Plaintiff, as related herein.

N. The torture escalation sequence across the illegal BRMT torture psychological and illegal BRMT biomedical hijackings from 2002 coercive psychological operations have and do progress as follows:

	Location	Defendant UNITED STATES Illegal BRMT Brain Hijackings And Racketeering Patterns
2001-2002	Kirkland, WA 149th Street home	Prelude sequence - 9/11 attack is proximate to 90 minute Capitol Hill interview with Rep. Dunn, close to Bush 43, meet with Adam Smith, all intended to secure a baseline for torture escalation sequence below – illegal medical research methodology used by FAUCI and other researchers
2002-2003	Kirkland, WA 149th Street home	Allegent, LLC financial wrecking, another in the series of prolonged marital separations from Jeanette, Jeanette suicidality phone call from the Lewis (MELBER, FBI) second home, CNA compensation theft litigation, and street level coercive psychological operations begin
2004-2005	Kirkland, WA 149 th Street home and 124 th St apartment	(a) Coercive psychological operations, <i>adding</i> (b) then unrecognized illegal BRMT biochemical brain hijacking <i>used</i> to induce biochemical depression and suicide ideation
2006-2007	Boston, MA hotel (4 months) then homeless shelter (17 months)	(a) Coercive psychological operations and (b) unrecognized illegal BRMT biochemical brain hijacking to depression, <i>adding</i> (c) Extreme daily morning headaches imposed by illegal BRMT hijacking while enroute to Boston Public Library - where eyes must be kept open at all times to avoid being removed from the Library for sleeping in the Library, required reading with vision extremely limited
2008-2010	Cliffside Park, NJ apartment, forced homelessness upon filing of civil rights litigation	(a) Coercive psychological operations, (b) illegal BRMT biochemical brain hijacking to depression, (c) extreme daily morning headaches, <i>adding</i> (d) Extreme physical body cramping of arm, leg, and chest muscles to induce verbalizations, biochemical depression, and suicide ideation
2010-2011	Paramus, NJ involuntary confinement in behavioral health ward after no-notice no appearance civil hearing, if any	Violent thoughts <i>added</i> through illegal BRMT brain hijacking, coercive drop of federal civil rights litigation leads to rehousing ten weeks after coercive drop, housing had always been available during confinement, clear coercion to force drop in using an embed “patient” to describe prolonged confinement
2011-2018	Ramsey, NJ	Initial violent thoughts and biochemical depression, transition away from covert biochemical torture, continued coercive psychological operations, followed by federal and local police powers illegal coercive operations and entrapments, e.g., sex traps, FBI and/or
2018-present	Edgewater, NJ	

		CIA Akoto and interstate commerce asset stripping and structured payment entrapments, sex traps, psychological isolations reprises, then 2018 human trafficking and coercive psychological operations again into national security entanglements from the 1970-1990s, <i>adding</i> accelerated lethality sequences in 2021-2024
--	--	--

O. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	99, 226 table, 421, 444, 462, 492-493, 501, 602 NSEC-3, 605 HEXP-2
Appendix 2 paragraphs:	1-032
LPEE Table 2 pages 12023-12120 paragraphs:	2-0153

LPEE pages (see technical note on page numbering at paragraph 230):	LPEE pages 368-793, LPEEV65-11-17
Emails and documents by topic and date, also located in LPEE:	Bergen Regional Sinisi re resume and cover ltr 101230

607. *HEXP-4 Illegal Human Experimentation: BRMT Induced Emotional Swings And Short Cycle Torture Sequences Through 2023*

A. As forensically reverse engineered, defendants have and do orchestrate a variety of short cycle torture sessions in public places subsequent to the sequences above including, without limitation:

- 1) Ongoing: frequent apparent emotional excursions from calm baseline behaviors (see paragraph 320e and LPEE pages 190-236, independent psychological validations of actual personal emotional stability), which would be indicative of bipolar emotional swings, have been and continue to be illegal BRMT hijackings in all variety of venues, ranging from Lead Plaintiffs' personal residence (which is systematically surveilled without consent) to public accommodations and venues he attends from bus transportation to sidewalks to parks, to theaters and museums. These BRMT hijackings have been and are used to create false public perceptions about Lead Plaintiff's emotional stability as he has been and is pervasively surveilled and hijacked at defendant UNITED STATES' convenience to create false perceptions as it manipulates and controls this false narrative about his emotional stability, which is directly contradicted by independent tests (LPEE pages 190-236). These emotional hijackings are particularly pervasive but still erratically applied, such as in moments when Lead Plaintiff cites his great-great grandfather and the act which resulted in his Medal of Honor award in 1865, so

are most probably indicative of the personal backgrounds of defendant UNITED STATES' BRMT operators in their continued illegal acts.

- 2) Mets game August 2021: Defendant UNITED STATES (CIA), inflicted extended extreme pain in a left knee lateral collateral ligament (for about 7 to 10 minutes as a USMS/CIA security team member (white male early 30s) stretched his left leg to a fully extended position over the empty seat in front of them), and the Lead Plaintiff was put to sleep immediately prior to two base hits with loud home crowd noise, and reawakened as the two men stood on first and second base.
- 3) August 1, 2023: when sleep deprivation over a three day period was used to prime the Lead Plaintiff for one of thousands of attempts to orchestrate some sort of public outburst of violence by Lead Plaintiff. None occurred, and never has occurred, though he does at times speak openly in public places without a direct audience, as he recognizes the pervasive pattern of surveillance that accompanies his unintended public notoriety as purposefully perpetrated by technical hacks by defendant police powers and collaborating media.
- 4) September 23, 2023: during a Wynton Marsalis concert, as defendant UNITED STATES, likely CIA, inflicted extended extreme pain left knee lateral collateral ligament for ten minutes initially, then an additional five minutes after the intermission.
- 5) October 10, 2023: during a bus trip after depositing written evidence of BRMT and racketeering with members of Congress as defendant UNITED STATES, likely CIA, inflicted extreme pain by an extended period of cramping of the right

palm and an extended period of extreme pain in a knee tendon behind both knees, see LPEE pages 12146-12149.

- 6) October 20, 2023: while awaiting NJ Transit bus route 158 from about 6:00 P.M., as defendant UNITED STATES, likely CIA, with a strong adrenaline (angry emotional sensation) surge which was physically associated with the simultaneous arrival of a bearded male agent at the bus stop immediately south of Thompson Lane, Edgewater, NJ, after some delay in the scheduled arrival of the bus; but which was actually the direct result of an illegal BRMT bioweapon and bioweapon delivery system hijacking to create a flash release of extreme adrenaline (fight or flight anger momentary response), intended by the BRMT operator to be directed by the Lead Plaintiff at that federal undercover officer who arrived at that moment. This sequence is quite familiar to the Lead Plaintiff from other similar events. The BRMT hijacked emotion is experienced by the victim as completely authentic, as it directly hijacks the specific brain biochemistry in which that emotion originates (by causing a short-term extreme biochemical surge which is similar in intensity to a muscle cramp). The hijacking is impossible to detect without prior specific experience to recognize it as fraudulently manipulated by the illegal BRMT bioweapon and bioweapon delivery system. This poses a clear and present danger to the member of the public who is the victim of this extreme biochemical hijacking, and to any nearby member of the public or undercover police officer who would be completely unaware that the entire sequence leading to the assaultive moment was being remotely hijacked by the illegal BRMT bioweapon and bioweapon delivery

system. See the contemporaneous write-up of this hijacking event by defendant UNITED STATES (CIA) at LPEE pages 12150-12159.

B. These occurrences have become commonplace in Lead Plaintiff's life experiences over the past twenty years since the first illegal BRMT cramping of the palm was experienced around 2004, though they were certainly not recognized for what they actually were and are – the direct hijacking of the human brain's biochemical and central nervous system to control a victim's mood and muscles through an illegal brain hijacking. Incidents of short cycle torturous abuses of the central nervous system by defendant UNITED STATES against the Lead Plaintiff number in the thousands, or perhaps tens of thousands over the years, so no attempt has been made to document each event as they were not recognized for a long time and there have simply been too many to count. Medical records, including neurological examinations and MRIs, show no neurological damage which would provide any alternate organic medical explanation for these central nervous system hijackings by illegal BRMT abuse.

C. Defendant UNITED STATES most probably employed this method of extreme illegal BRMT biomedical abuse to orchestrate the murder of Audrey Brewer in September 2011 (paragraph 10) using an physically and emotionally abused female intermediary as the direct perpetrator while acting in apparent extreme rage under the direct influence of the illegal BRMT bioweapon system used to physically hijack her rate of pineal gland extreme adrenaline surge (adrenaline fight or flight hormone) to provoke the knife slashing attack which resulted in Audrey Brewer's death from the slashing of her carotid artery in her neck. The female perpetrator had absolutely no history of violence at any time but was also being psychologically provoked by the psychologically manipulative male who was involved in the relationships with both women at various times. The psychological abuse by the apparent perpetrator was used in

the moment to conceal the illegal BRMT bioweapon and bioweapon delivery system and its human operator from detection as the actual perpetrator of the extreme biomedical hijacking.

D. This momentary sense of extreme rage which was most probably experienced by the knife wielder is comparable to the momentary biochemical rage induced in Lead Plaintiff by the illegal BRMT bioweapon and bioweapon delivery system in the August 2023 Manhattan Subway Tunnel Flash Incident documented at paragraph 619 HEXP-16, LPEE pages 11668 and during an unrecorded incident adjacent to Lead Plaintiff's residence between August 2008 and October 2010 in Cliffside Park, NJ. The intent of defendant UNITED STATES (CIA) in orchestrating this process against US persons would have been and would be to facilitate its future deployment against others which it targets for assassination.

E. Since (i) the illegal BRMT bioweapon and bioweapon delivery system is highly classified through on-going abuse of the state secret privilege and defendant DOJ's active participation in its fraudulent concealment from public view, (ii) there is no previously known analogous weapon at any time in human history, and (iii) illegal BRMT hijackings leave no trace evidence behind as these hijackings are biochemically driven using a series of carefully focused energy pulses which penetrate the skull into the brain, and like any energy wave or pulse leave no trace evidence behind. The energy pulse is invisible, there is no abnormal sensation associated with it so it remains concealed. The actual perpetrators. a defendant UNITED STATES' BRMT operator and their chain of command, remain fully concealed from view and could only be detected by understanding enough about this energy weapon to develop a specific detection device for an energy pulse weapon which was not even known to exist. The simple act of destroying any residual classified evidence, such as computer software tracking logs and error trapping log files, encrypted communications transmission logs, and similar device logs, makes

this a perfect crime perpetrated by these defendants. In this homicide case, it was one of the two victims in that moment of purely evil surreptitious biochemical extreme pulse hijacking of adrenaline, who was charged with the crime because her hands and body were hijacked to conduct this crime, actually most probably a live field test of an assassination method, under an extremely well fabricated set of field conditions in a moment of organizational transition at defendant CIA (paragraph 10). These types of obstructions of justice by various departments and agencies of defendant UNITED STATES are common practices extensively documented by Lead Plaintiff herein at (a) paragraphs 308, 556, 633A, 785, 793, 801, 804B, 806C, 807C, 839, Interline Exhibits 17-19, (b) in public reports such as the 1975 Senate Select Committee report referenced at paragraph 339 and LPEE pages 6885-7288, and (c) in the 2014 Senate Intelligence Committee CIA Torture practices report referenced at paragraph 340.

F. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their

children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	10, 320e, 604D, 606N, 619 HEXP-1, 3, 16
Appendix 2 paragraphs:	1-067
LPEE Table 2 pages 12023-12120 paragraphs:	2-0217
LPEE pages (see technical note on page numbering at paragraph 230):	11653-11654, 11668, 12129 (third paragraph), 12150-12159, LPEEV65-1, 3, 17
Emails and documents by topic and date, also located in LPEE:	Not applicable

Orchestrated Personal and Intimate Relationships

608. HEXP-5 Illegal Human Experimentation: Personal and Intimate Relationships - Orchestrated Romantic Interests Using BRMT Hormone Hijacking, Generally

A. As forensically reverse engineered, defendant UNITED STATES has and does use its illegal BRMT bioweapon and bioweapon delivery system to deliver and suppress natural occurrences of hormones including, without limitation, melatonin (sleep), oxytocin (love), and adrenaline (fight or flight) to manipulate Lead Plaintiff to their desired goals, established by executive program management including, without limitation defendants BREYER, BURNS, HOPPER, and FAUCI. Those goals have included, without limitation, the melatonin (sleep) induced double murder attempt by motor vehicle, see paragraph 694 LETHL-1, and oxytocin hijacking used for thefts of real property, cash, and personal property, see paragraphs 609-613 HEXP-6-10.

B. Defendant UNITED STATES has used illegal BRMT bioweapon and bioweapon delivery system hijacked oxytocin dosing to manage the romantic and intimate relationships of

Lead Plaintiff by suppressing or accelerating the oxytocin (love) hormone, began as early as 1968 (paragraph 417) to gain and sustain control of the Lead Plaintiff and his involuntary servitude from that time to the present. These illegal BRMT induced brain biochemical hijackings occurred in the presence of, and/or to, his long term college girlfriend Susan Irish, a second strongly interested college friend who later became a regional television news anchor, Katherine Andrews, and other interim dates and relationships, all of whom were carefully maneuvered into place and/or removed from other people they could or did naturally develop an interest in, by defendant CIA and its agents, officers, or confidential informants. Defendant haas and does use the illegal BRMT bioweapon and bioweapon delivery system to extend involuntary servitude and illegal control of human victims including, without limitation, Lead Plaintiff, throughout the weapon's development, testing, and deployment across multiple generations of technological and medical progressions. This aspect of defendant UNITED STATES' pattern of involuntary servitude was forensically identified beginning in 2021, while examining Lead Plaintiff's own evolving circumstances during key periods in his life.

C. Defendant UNITED STATES, primarily CIA, FBI, ARMY, USMS, BREYER, GARLAND, CUNHA, DICKOVER, BRUNTON, William SACKVILLE-WEST, PAGE and NG, were among the team which continued this manipulation of romantic and intimate interests forward from high school through his undergraduate program at Green River Community College, Auburn, WA in 1973-74 and Washington State University, Pullman, WA in 1974-1977. See also the more recent examples at paragraphs 611-614 HEXP-8 through HEXP-11, including various interim romantic interests and both spouses Lynne and Jeanette.

D. On knowledge and belief, defendant UNITED STATES also orchestrated and conducted interferences in and of his romantic partners and their level of interest and/or

disinterest, who were most probably subjected to both psychological manipulations and to illegal BRMT bioweapon and bioweapon delivery system hijacking to manage this aspect of their lives, so they themselves are also most probably members of this class of injured US persons.

E. Various defendants (including, without limitation, UNITED STATES, ARMY, CIA BREYER, William SACKVILLE-WEST, Craig PAGE, BURNS, WATERS, FAUCI, unknown others) deliberately conspired to place romantic interests in Lead Plaintiff's life facilitated by illegal BRMT bioweapon and bioweapon delivery system brain hijackings of oxytocin and other hormones (see paragraphs 611-614 HEXP-8 through HEXP-11) from the 1970s through the 2020s. Defendants have and do continue this pattern of romantic and intimate interests manipulation through the present, as partially related in other subcounts herein, by purposefully screening-in and screening out potential romantic interests using various means, including orchestrated meetings, relationships orchestrated using wire fraud on spoofed dating sites (currently on-going since about 2004), incomplete relationships formed on dating sites from 2004, and Lead Plaintiff's known concern in recent years to retain traceability of these manipulations, to sustain their psychological isolation of Lead Plaintiff.

F. Defendant UNITED STATES most probably employed this method of extreme BRMT abuse to orchestrate the murder of Audrey Brewer in September 2011 (paragraph 10). A physically and emotionally abused female intermediary was the knife wielder and apparent direct perpetrator who acted in a confrontation and moment of apparent extreme jealous rage, but actually directly manipulated into the emotional state under the direct influence of the illegal BRMT bioweapon system which was used to physically hijack her pineal gland to biochemically surge adrenaline (the fight or flight hormone). This specific BRMT manipulation of her pineal gland provoked the knife slashing attack which resulted in Audrey Brewer's death as she bled

out from the unrepairable longitudinal slashing of her carotid artery. The female perpetrator had absolutely no history of violence at any time but was also being psychologically provoked by the manipulative male who was involved in relationships with both women at various times.

G. The psychological abuse of the apparent perpetrator by the misogynistic male former partner who was with Audrey that night at a Walla Walla, WA restaurant was used as the obvious public explanation of the extreme conduct in a fit of jealous rage - but was in fact a psychological device (similar to a sleight of hand trick performed by a magician) used to conceal the actual BRMT perpetrator, almost certainly a field operator concealed near the scene somewhere in the background, who commanded the extreme adrenaline biomedical hijacking of that specific victim in that specific moment of apparent rage. Since the illegal BRMT bioweapon and bioweapon delivery system is an illegal highly classified weapon, of a form not previously known in human history, which leaves no trace evidence (the series of carefully focused energy pulses absorbed through the skull into the brain leaves no trace evidence behind)., there would be no reason for anyone investigating the scene to look any further than the obvious facts - jealous women, murderous sequence, clear perpetrator, clear victim, case solved, another community tragedy.

H. HOWEVER, specifically during the months leading to this murder in Walla Walla, WA, Lead Plaintiff, 2,700 miles away in Ramsey, NJ, having just been relocated from Bergen Regional Medical Center on March 30, 2011 as described at paragraph 523, was being manipulated by that same illegal BRMT bioweapon to encourage him to choose a kitchen knife to assault his roommate Emil while they sometimes stood in the apartment kitchen they shared. Lead Plaintiff began experiencing the urge soon after his arrival, and he continued to experience it frequently for several succeeding months, finally reporting it to his psychiatric doctor, a

medical resident doctor at Bergen Regional Medical Center, who elected to increase his dose of Abilify as a result. Upon learning of Audrey's death in September 2011, who Lead Plaintiff had met at a Tacoma, WA family event at Johnny's dock when she was four years old, he reported his shock to an assigned minder, a male counselor assigned from Advance Housing, but made no connection at the time between the knife attack and his own impulses to pick up a knife in the preceding months in the presence of his roommate, which act he never undertook. But the connection to a family relative, and the date on which the attack occurred, September 6, 2011, the repeated drawing of his attention to the time 9:11 by BRMT remote operators which occurred hundreds of time disrupting his concentration during normal thought patterns and routine tasks over many years, led him to the eventual realization in April 2024 that the transition from acting CIA director (Assistant Director) Michael Morrell to Senate confirmed Director David Petraeus occurred on the exact date of Audrey's Walla Walla, WA murder, September 6, 2011, and that the knife impulse provocations sequence that had been run on him for about four months before it was almost certainly experienced by the physical perpetrator who was used to attack Audrey in September 2011. The specific transition date of the transition from Acting Director Morrell to Director Petraeus is sourced from Wikipedia.

I. FURTHER, the knife wielding physical perpetrator's momentary sense of extreme rage during the attack was most probably very similar to the momentary biochemical rage induced in Lead Plaintiff during an unrecorded incident adjacent to Lead Plaintiff's residence between August 2008 and October 2010 in Cliffside Park, NJ, and then again years later using the illegal BRMT bioweapon in the August 2023 Tunnel Flash Incident documented at paragraph 619 HEXP-16, LPEE pages 11668.

J. FINALLY, the intent of defendant CIA, and of other elements of defendant UNITED STATES, in orchestrating this process against US persons would have been and would be to facilitate its future deployment against others which it illegally targets for assassination using unwitting third parties. Though targeted assassinations are illegal under US law, this entire complaint relates to systematic evasions of US law by defendant UNITED STATES including, without limitation, agencies of defendant DOJ, which have and do perpetrate such violations including within the sphere of state secret privilege, to systematically abridge the unalienable rights of US persons, which defendant DOJ, acting in its own perceived interests, not in the People's interests, has and does choose to continue to perpetrate and to ignore as conducted by others claiming discretion as the reason for its own self-interested acts.

K. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and

lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	10, 417-418, 612-615, 619 HEXP-9-12, 16
Appendix 2 paragraphs:	1-001
LPEE Table 2 pages 12023-12120 paragraphs:	2-0038, 2-0128, 2-0171, 2-0179, 2-0185
LPEE pages (see technical note on page numbering at paragraph 230):	1 et al, 140 et al, 11668, LPEEV65-1
Emails and documents by topic and date, also located in LPEE:	Not applicable

609. *HEXP-6 Illegal Human Experimentation: Personal and Intimate Relationships - Orchestrated BRMT and Other Interference in Marital Community With First Spouse, Lynne 1980-1988*

A. As forensically reverse engineered, defendants including, without limitation, FBI, CIA, and KCSD purposefully orchestrated the initial meeting of Lead Plaintiff and Lynne Boyle. Lynne Boyle was the double ex-wife, as they twice married, of a King County Sheriff's Department serial killer task force member, Gregory Boyle, who reported to defendant REICHERT, then was leader of that Task Force when REICHERT was promoted, and still later was Maple Valley, WA precinct commander, all while Gergory Boyle reported to REICHERT. Lead Plaintiff and Lynne were professionally isolated together at a months-long financial audit assignment at Safeco in early 1980. Deloitte Seattle was used by defendant UNITED STATES. Primarily supervised by defendant USMS, Deloitte Seattle was a commercial cover operation for various legal and illegal domestic and international spying operations, as well as for the continued illegal development of the BRMT bioweapon and bioweapon delivery system (paragraphs 359-399). Lead Plaintiff's introduction to Lynne was facilitated by the direct

assignment of an embedded FBI agent or romantic interest thereof, Margaret Dufresne, to the Safeco financial audit project as its overall manager. Margaret presented as the romantic partner and later wife of Bruce Ciosacchi, who was known to Lead Plaintiff and to Lynne, to be an FBI agent. Lead Plaintiff, romantic partner and later wife Lynne, Margaret Dufresne, and Bruce Ciosacchi maintained a social relationship for several years after this initial four month project assignment in 1980.

B. Among other illegal BRMT and coercive psychological manipulations in the 1980s, while defendants WEISSMAN, ROSENBERG, and BURNS, were proximate, defendant UNITED STATES later attempted to endanger spouse Lynne and to entrap Lead Plaintiff in, among other malign events, the Stevens Pass Ski Area anger (BRMT hijacked adrenaline) flash and subsequent dangerous walk-off by Lynne, related at paragraph 621 RGTS-1.

C. In 1987-88, defendant UNITED STATES, principally acting through BURNS, SWAIN, ROSENBERG, WATERS, TARPLEY, destroyed this first marital community with Lynne. Defendant UNITED STATES used the illegal BRMT bioweapon and bioweapon delivery system to emotionally hijack Lynne with heavy doses of the hormone oxytocin while she was engaged in a heavy professional work schedule at US West New Vector Group in the presence of serial adulterer SWAIN (paragraph 440, 496, 600H NSEC-1, 609C HEXP-6) to orchestrate a relationship with SWAIN. A combination of (i) Lead Plaintiff's work-related absences for extended weekly travel at Deloitte Seattle, her two daughters having both recently left the family home to attend college, and Lynne's excessive work assignments requiring extensive overtime hours and creating exhaustion, were used to create fatigue and emotional distance, and illegal BRMT hacks of her pineal gland to produce oxytocin, which operated together to create her attraction to serial adulterer SWAIN, and to break Lynne's relationship

with Lead Plaintiff. Defendants eventually succeed in causing and creating the circumstances of the divorce by delivering these overdoses of oxytocin (love hormone) in 1987-88 to Lynne in the presence of her best work friend's husband, SWAIN, a serial adulterer. This pattern of racketeering acts resulted in the divorces of both couples; forced the liquidation of community real property, improvements, and other assets; and caused and created the loss of marital community, of mutual emotional and financial support, and a wide range of future financial benefits from that marital community which would have been sustained if it remained intact including, without limitation, accretion of financial assets and real property appreciation of the residence on NE 133rd Street, Redmond, WA, Interline Exhibit 13.

D. Defendant UNITED STATES used this sequence in the 1980s, as it would do again many times in the future with steadily increasing frequency as times passes as related herein, to inflict psychological stress on its unwitting human biomedical experiment subjects to support its development and deployment of the illegal BRMT bioweapon and bioweapon delivery system, as it directly interfered in the personal lives, careers, and brain biochemistry of both spouses. This cycle of destruction and its acceleration across time are indicative of obsessive, compulsive psychopathy (paragraph 820O-Q). It is also indicative of the sustained and increasing damage knowingly and willfully perpetuated and accelerated by the pattern of fraudulent concealment, willful blindness, and neglect to prevent of defendant DOJ, which enables these emboldened criminal perpetrators of defendant UNITED STATES to extend and accelerate their pattern of illegal acts, violations, and injuries. The pathology of this cycle is repeatedly demonstrated in the series of development cycles of the illegal BRMT bioweapon and bioweapon delivery system described throughout this complaint. This specific cycle was both a successor and a precursor to the murderous cycles cited at paragraphs 609 and 803.

E. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. Paragraph 604 HEXP-1 subparagraph I is incorporated herein by reference. Paragraph 608 HEXP-5 subparagraphs C, D, E are incorporated herein by reference See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	13
Complaint paragraphs:	359-399, 440, 496, 600H NSEC-1, 609C HEXP-1, 621 RGTS-1
Appendix 2 paragraphs:	1-010, 1-011, 1-014, 1-015
LPEE Table 2 pages 12023-12120 paragraphs:	2-0023 through 2-0039
LPEE pages (see technical note on page numbering at paragraph 230):	153-154 (para 42-45), 181-182 (para 107-111), 8233-8262
Emails and documents by topic and date, also located in LPEE:	D Brewer Marriage Cert May 5 1984 Lynne 840505.pdf D Brewer Marriage Cert May 5 1984 Lynne 840505.pdf

610. *HEXP-7 Illegal Human Experimentation: Personal and Intimate Relationships - Orchestrated BRMT and Other Interference in Fraudulent Marital Community With Second Spouse, Jeanette 1988-2005*

A. As forensically reverse engineered, when Lead Plaintiff's relationship with wife Lynne completely ended in 1988, he was reintroduced to Dorothy V. FULLER, a friend he had met on a United Way community fund budget allocation panel while at Deloitte Seattle through 1986. Defendant UNITED STATES used FULLER to hold Lead Plaintiff's interest for a time in early 1988 with the support of TARPLEY, an embedded federal agent employee of LazerSoft where Lead Plaintiff was CEO from 1990-1993. As Lead Plaintiff's divorce from Lynne was being processed by the Court in 1988, FULLER was then dropped out in Spring 1988 after about 2-3 months, so defendants CIA, ARMY, and BURNS could introduce a longer term romantic interest, Jeanette. Jeanette was most probably coerced into the relationship with Lead Plaintiff due to her deliberate inculcation in national security matters by defendant ARMY, which knew of her then illegal (in military service) sexual orientation, and worked to incriminate her specifically for this purpose by placing her in undercover intelligence assignments in the Middle East, where she may have known CORNWELL, as described at paragraphs 494-501.

B. Defendant WATERS, then reporting to Lead Plaintiff as a contract software engineer at LazerSoft, orchestrated the meeting of Lead Plaintiff and Jeanette (paragraph 494). He badgered Lead Plaintiff into agreeing to a week-night drinks session which "coincidentally" had the two males "drop in" on an obscure hotel basement cocktail lounge with a live band (most probably a police powers personnel live band) at the Greenwood Inn, Bellevue, WA. Several female co-conspirators were present at this "girls night out" which was used to introduce Jeanette Smith, who was then a temporary employee assigned to First American Title Insurance, Bellevue, WA.

C. Without limitation, defendants BURNS, WATERS, CIA, ARMY, FBI, USMS maneuvered Jeanette into position (paragraph 494-501). As Lead Plaintiff would learn later in 1988 when he visited her residence, she “coincidentally” resided directly across the street from the BURNS residence on 149th Street, Kirkland, WA. At the time, BURNS was a Board member of LazerSoft originally introduced by STONE, who either posed as or was an OB/GYN practicing at Evergreen Hospital in Kirkland, WA, and though unknown at the time, was the primary executive in charge of the illegal BRMT bioweapon and bioweapon delivery program, succeeding BREYER and HOPPER. This orchestrated introduction in Spring 1988 (as Lead Plaintiff was going through divorce and more emotionally vulnerable than usual) eventually resulted in Lead Plaintiff’s March 1990 second marriage to Jeanette, just as Lead Plaintiff was also purchasing the assets of Steve’s Maintenance, an FBI or USMS cover operation (then completely unbeknownst to the unwitting Lead Plaintiff), later renamed Alliance Environmental Services (Alliance).

D. At least four lengthy informal separations (four to six months typical) were most probably orchestrated under military orders to facilitate the further development of the illegal BRMT bioweapon under the management of defendant BURNS, then defendant FAUCI, over a very challenging 15 year marriage to Jeanette from 1990 to 2005, while she likely remained under threat of deferred military prosecution throughout the period to continue manipulating her. Lead Plaintiff’s stepson Bryce (Jeanette’s son) developed symptoms of schizophrenia during his teen years and engaged in several violent outbursts against both Lead Plaintiff and his wife Jeanette, forcing them to remove him from the family home to avoid a deadly outburst against his mother Jeanette.

E. The disastrous acquisition of illegal cover company Steve's Maintenance, which had been and was then being surreptitiously used by defendant FBI in field investigations of the asbestos abatement industry, including its fraudulent deprivation of SBA government bid and performance bond guarantee benefits, and other criminal racketeering acts by defendant FBI, related at paragraphs 445-453, 471, 626 RGTS-6, 644B(i), 649, 650B(i), 651D, 653, 683 RICO-6, 11, 12, 13, 15, 45, led to Chapter 7 personal bankruptcy in late 1993. Multiple periods of financial instability included multiple orchestrated business failures, employment instability and unemployment, arbitrary termination. This sequence was a fifteen year rolling psychological, emotional, and financial disaster for Lead Plaintiff and for Jeanette, while residing directly across the street from defendant BURNS' alleged primary residence. Defendant BURNS was replaced sometime in the early middle 1990s as the cross-street neighbor.

F. For example, without limitation, the first residents who succeeded BURNS directly across from the 149th Street, Kirkland, WA residence where Lead Plaintiff and Jeanette resided, ostensibly owned a Vibra-Clean franchise, which can be used to secure illegal entry and general searches of private residences and businesses of interest to DOJ police powers agencies and prosecutors. The second family's male breadwinner posed as a realtor. Realtors commonly receive financial information from clients to qualify and assist in mortgage applications and can also be used to sustain programmatic human trafficking to support illegal BRMT and other malign programs by orchestrating residential choices into surreptitious cover housing using favorable rental rates and sales prices. Lead Plaintiff notes that both his Redmond and Kirkland residences, paragraphs 609, 610 HEXP-6, 7, sold extremely rapidly within two weeks after listing at prices favorable to the purchaser (whether an authentic private party, a favored private party, or a straw purchaser to restore to surreptitious ownership under cover is unknown), which

prices were recommended by the realtors involved to the Lead Plaintiff and the divorcing spouses. One realtor then proceeded, without authorization, a \$5,000 discount on the agreed listing price without consent on the 149th Street, Kirkland, WA property.

G. Despite these orchestrated problems, Lead Plaintiff rebuilt the house he was living in near Kirkland, Washington (see Interline Exhibit 14) which is directly across 149th Street from the initial cover residence used by Dr. Heffron (BURNS) into the early 1990s. Lead Plaintiff also rebuilt his personal credit beginning in 1994, after the defendant FBI imposed business failure of Alliance, which also occurred while living across 149th Street from Heffron (BURNS), and through a series of further trafficking and related acts, violations, and injuries by, without limitation, BURNS, ROSENBERG, CORNWELL, PERILLO, COOK, RUBIN, VINDMAN, MELBER, CIA, ARMY, FBI, USMS while residing in Washington state and working in multiple states and briefly in the United Kingdom, as related at other subcounts herein.

H. After approximately two years of dating and fifteen years of marriage from 1988 to 2005, defendant UNITED STATES again orchestrated the final destruction of the Lead Plaintiff's marital community with Jeanette in 2004-2005. As before, defendant UNITED STATES (including ROSENBERG, BURNS, CIA, ARMY, FBI) acted to support its development and deployment of the BRMT bioweapon and bioweapon delivery system by interfering directly in the personal lives, careers, and brain biochemistry of both spouses, causing, among other acts, violations, and injuries, financial distress and extended separations for the purpose of harming and destroying the marital community, and engaged in other deliberate acts which stressed, harmed, endanger and attempted to entrap spouses.

I. Defendants eventually succeed in causing and creating the circumstances of the divorce from Jeanette in 2005 including, without limitation, forced liquidation of real property and improvements at 149th Street, Kirkland, WA, wherein a carefully pre-planned pre-payment penalty on the final mortgage of \$9,950 orchestrated with spouse Jeanette by defendant UNITED STATES was piled onto other losses as the forced sale of the 149th Street, Kirkland, WA property was closed and net proceeds were distributed, and loss of marital community and mutual support, and a wide range of future financial benefits from an intact marital community, including accretion of financial assets and real property appreciation. Similar property theft abuses just under the \$10,000 reporting limit, which also constitute racketeering acts in deprivation of property rights by defendant UNITED STATES include, without limitation, paragraphs 656, 661 RICO-18, 23, 830D, 831G, and of an international \$5,000 reporting limit at paragraph 665.

J. All these orchestrated acts, as documented in paragraphs 600-710 NSEC 1-4, HEXP 1-17, RGTS-1-17 RICO-1 through 55, LETHL 1-17, were in the illegally imposed involuntary servitude to defendant UNITED STATES and directly benefitted and promoted the development of illegal BRMT brain hijacking by providing brain chemistry and neurological insights to defendant UNITED STATES and its co-conspirators, while they engaged in a systematic conspiracy against constitutional, statutory, and common law rights in an associated-in-fact enterprise fraudulently concealed under the illegal assertion of state secrets privilege in violation of, without limitation, 5 U.S.C. § 301 and *Reynolds*, which defendant DOJ, in its own interests and those of GARLAND, BURNS, and others, who have and do conspire to and continue to willfully neglect to prevent criminal violations of constitutional rights as their duties require by

42 U.S.C. § 1986 and under the United States Constitution, which imposes upon all Executive Branch appointees the duty to “take care that the laws be faithfully executed.”

K. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants’ long-running schemes, frauds, and swindles to sustain defendant UNITED STATES’ involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 604 HEXP-1 subparagraph I is incorporated herein by reference. Paragraph 608 HEXP-5 subparagraphs C, D, E are incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	14
Complaint paragraphs:	445-453, 471, 494-501; 626 RGTS-6; 644B(i), 649, 650B(i), 651D, 653, 683 RICO-6, 11, 12, 13, 15, 45
Appendix 2 paragraphs:	1-017 through 1-027
LPEE Table 2 pages 12023-12120 paragraphs:	2-0040, 2-0045, 2-0046, 2-0054, 2-0055, 2-0062 through 0092, 2-100 through 2-0121

LPEE pages (see technical note on page numbering at paragraph 230):	155-164 (paragraphs 45-69), 8263-8287, 8347-8350
Emails and documents by topic and date, also located in LPEE:	D Brewer Marriage App Jeanette 1990 900330.pdf D Brewer Marriage App Jeanette 1990 900330.pdf Jeanette Timeline 1 061001.pdf Jeanette Timeline 2 061001.pdf Jeanette Timeline 3 061001.pdf Jeanette timeline email 061001.pdf

611. *HEXP-8 Illegal Human Experimentation: Personal and Intimate Relationships - Orchestrated Romantic Interests, Induced Fraudulent Relationship – Stephanie Clifford (MODDERMAN) 2008*

A. As forensically reverse engineered, defendants used the online dating platform Match.com, owned and controlled by defendant MATCH GROUP, or its spoofing by an unknown defendant police powers operation, likely defendant UNITED STATES, to screen-in and screen-out persons of interest to Lead Plaintiff, to sustain its involuntary servitude; and to orchestrate, to conspire to arrange the introduction of a co-conspirator whether involved by choice or coercion, and to arrange a brief fraudulent relationship (about six weeks, six week separation for a mother and children summer trip, then one date to break up) between Lead Plaintiff and Marinka MODDERMAN (Stephanie Clifford) in 2008. This relationship required at least one of the two parties to engage in interstate travel at all times during the relationship. Lead Plaintiff spent over \$1,000 to travel and pay for meals and other entertainment during these 2008 fraudulent relationship dates.

B. Lead Plaintiff had dates with this New York City resident in New York City and Cliffside Park, NJ. Defendant UNITED STATES and MODDERMAN intended this act to continue the public discrediting process of Lead Plaintiff continued by FBI (ROSENBERG), USMS, CIA, ARMY in their 2002-2005 fraudulent family and business wrecking process in the Kirkland, WA area, through trafficking to Boston, MA and homelessness in 2006-2007, then to

ESTABLISH in Fort Lee, NJ for ten months of fraudulent employment in 2007-2008, including a Pittsburgh, PA cameo appearance by former FBI Director MUELLER in an upper floor office in PPG headquarters orchestrated by defendant ROSENBERG.

C. During one of the Cliffside Park dates in Spring 2008, as Lead Plaintiff experienced a period of erectile dysfunction (ED), MODDERMAN suggested a relocation but did not explain the actual purpose, saying “I thought it might help.” It did result in placing the Lead Plaintiff in front of his television, whereupon the illegal BRMT induced ED symptoms immediately disappeared. On knowledge and belief, the forensically reverse engineered purpose of this illegal BRMT (defendants CIA, FBI) sexual abuse in conspiracy with MODDERMAN was to relocate Lead Plaintiff, placing him in a position to be captured on a video camera hidden in the flat screen television, used for public replay as desired by defendant UNITED STATES after the live session recorded in this Cliffside Park, NJ “safe house” (with defendant CHALOM as landlord, USMS) where the unwitting Lead Plaintiff had been secretly relocated during his human trafficking from Boston, MA, and then resided from August 2007 to October 1, 2010 due to the human trafficking to defendant ESTABLISH by defendant ROSENBERG (FBI).

D. Lead Plaintiff and defendant MODDERMAN also took one weekend trip to rural NY and CT in late June 2008 related to the “wedding” of former co-worker PANKOWSKI at ESTABLISH (FBI, USMS) which included one night in a hotel where they were the only occupants on a summer weekend night, and a second night at a cabin alleged to be the summer home of the President of Yale University with two other “couples” and children. Introduced as friends of defendant MODDERMAN, their actual agency, higher education, and/or media affiliations are not specifically known and are subject to discovery.

E. Defendants ROSENBERG, ROSS, and UNITED STATES' orchestration of these events was again intended, as in past events, to maximize emotional distress by closely timing (i) the defendant ESTABLISH employment termination in June, (ii) the ostensible Pankowski "wedding" in June where (iii) past peers and bosses defendants ROSENBERG, ROSS, MCDONALD and other ESTABLISH employees were present, and (iv) the defendant MODDERMAN six week long separation in July-August, and breakup immediately thereafter, which was followed a few weeks later by (vi) a call from defendant MODDERMAN to Lead Plaintiff to express interest in further dates, which Lead Plaintiff declined.

F. The sexual abuse herein and at paragraph 821 specifically includes defendant DOJ, FBI, USMS, and CIA, other unknown police powers and press, media, and entertainment defendants, and the individual officials and persons therein in their deliberate, knowing, and willful election to engage in sexual abuse, and to slander, smear, libel, and interfere with contract rights of Lead Plaintiff in orchestrating fraudulent relationships, using MATCH GROUP websites either administered for their benefit or spoofed by them, between Lead Plaintiff and MODDERMAN in 2008, which included episodes of illegal BRMT sexual abuse by erectile dysfunction administered in accordance with a plan coordinated between CIA or elements of DOJ and MODDERMAN, and GIA in 2019-2020, paragraph 613 HEXP-10, which included episodes of illegal BRMT sexual abuse by erectile dysfunction administered in accordance with a plan coordinated between CIA or elements of DOJ and GIA for the corrupt purposes of introducing salacious sexual content which included Lead Plaintiff. These events and their public availability were intended to publicly humiliate, smear, and defame Lead Plaintiff as an element of defendants' criminal intent and conspiracy to construct a defamatory narrative about Lead Plaintiff, and to prevent him from pursuing his own interests which have

and do contradict that corrupt narrative including, without limitation, by falsely communicating the site of the Pentagon 9/11/2005 memorial service in media reports so Lead Plaintiff could not attend in 2005, the abuse of volunteer and public events at paragraph 526, Interline Exhibit 16, and paragraph 842B(ii), and systematic misdirection (LPEEV65-5). Defendants also engaged in sexual abuse of the Lead Plaintiff through these two defendants, MODDERMAN and GIA. The entire associated-in-fact enterprise pattern of racketeering acts and rights violations were all intended, together with other entrapments described herein, to conceal defendants' long-running corrupt and criminal public conduct, using public funds to sustain the illegal BRMT bioweapon and bioweapon delivery system developed by imposing illegal human subject medical experiments without consent upon the Lead Plaintiff and others from this religious group, and on other unknown plaintiffs, abused as their illegal human medical experiment subjects over decades, and to conceal their associated-in-fact enterprise pattern of racketeering acts, and their rights violations against, among other plaintiffs, the Lead Plaintiff since he was first human trafficked by defendant UNITED STATES at age 12. Members of his family have, and some continue, to practice a Quaker-based religious pacifist faith which defendant UNITED STATES has and does discriminate against based upon those pacifist beliefs while in military service to defendant ARMY, and subsequent to military service, have and do target them and their posterity for religious discrimination, and through color of law, for crimes against them, which have been and are perpetrated by, without limitation, defendant UNITED STATES (DOJ, FBI, USMS, and CIA) and its co-conspirator defendants herein.

G. Defendants also created other false allegations against Lead Plaintiff including, without limitation, of pedophilia, which they acted out in various public venues, using the children of police powers personnel in volunteer outings with New York Cares and in

psychological operations conducted using the illegal BRMT bioweapon and bioweapon delivery system (paragraphs 526, and in full knowledge of his actual conduct as described at paragraph 839) to create false public impressions of the Lead Plaintiff; with sex traps and female officers who preceded him on his walks in New York City, and on buses, subways, and trains for the purpose of creating and sustaining false narratives intended to slander, libel and defame the Lead Plaintiff and have and do interfere with contract rights with dating sites and public venues for this purpose (paragraphs 505, 608 HEXP-5); and have constructed and did sustain for years a terror narrative (paragraphs 464, 519, 555, 560, Interline Exhibits 17-18, 603B, F, G, L, 634C, 802B, 839) for the purposes of endangerment, libel, and slander of Lead Plaintiff; caused an event of forced public urination by coordinated police powers operations (paragraph 618 HEXP-15); orchestrated and provoked an illegal BRMT bioweapon and bioweapon delivery system flash temper attack coordinated with undercover police powers personnel (paragraph 619 HEXP-16); and have systematically misdirected public narratives and public opinion, and deliberately misdirected the actions of co-conspirator defendants, all as misdirection for defendant UNITED STATES' own slander, libel, misrepresentation, deceit, interferences with contract rights, and other myriad acts, violations, and injuries of Lead Plaintiff's rights, as described in all sections of this complaint.

H. When the continuation of this public humiliation campaign against Lead Plaintiff failed to provoke a criminal response of any kind as a result of these interactions with MODDERMAN, and the stress of the ESTABLISH termination in close proximity, the pace of discrediting by defendants UNITED STATES, ROSENBERG, ROSS, and others was further escalated and accelerated by defendants DOJ, FBI, USMS and CIA, with the assistance of USSS and police powers operations including defendants NYPD, PAPD, NJTPD, and others. This

sequence from June 2008 through October 2010 while residing at the 282 Palisade Ave Apt. 5, Cliffside Park, NJ “safe house” under landlord CHALOM (USMS) follows:

- (i) termination from ESTABLISH by ROSS in June 2008 (paragraph 466), and
- (ii) theft of thousands of dollars of ESTABLISH compensation in July 2008 (paragraph 641 RICO-3),
- (iii) the fraudulent ESTABLISH co-worker PANKOWSKI (FBI) wedding, per emails here listed in LPEE pages by date:

MODDERMAN email re PANKOWSKI wedding Drumm attends 080625,
MODDERMAN email re PANKOWSKI wedding Drumm attends 312pm 080625,
MODDERMAN re wedding 080626,

- (iv) a no-notice breakup initiated by MODDERMAN, after a six-week hiatus ostensibly for a summer family visit her mother in Canada; all within 90-100 days, which was then followed by:
- (v) a request to reunite from MODDERMAN, declined by Lead Plaintiff in August 2010, then
- (vi) renovation work to the Cliffside Park apartment requested by CHALOM (USMS) in 2010, which led to no income of any kind for about two months during the renovation (paragraph 642, RICO-4 which evidence was later destroyed by FBI using the method described at paragraph 656 RICO-18),
- (vii) which renovation work was never fully paid by CHALOM, who inspected the work, informed Lead Plaintiff he had no recourse as a written contract was required for improvements over \$5,000 and provided \$5,200, resulting in both an

- out of pocket loss for materials, equipment, and equipment rental; and loss of compensation for all labor hours expended over approximately 6-8 weeks, and
- (viii) approximately \$10,000 “Bank of America” credit card default when the payments could not be made after cancellation of expensive credit insurance (premiums of about 5% of outstanding balance over about two years), and due to the renovations short pay, as well as the loss of two months of unemployment income during the renovations, (paragraph 642, RICO-4 which evidence was later destroyed by FBI using the method described at paragraph 656 RICO-18), then
 - (ix) a pattern of further public discrediting and harassing combined with illegal BRMT physical assaults such as cramping and tensing of muscles, sleep deprivation by BRMT adrenaline awakening;
 - (x) escalation to illegal BRMT torture (paragraph 606 HEXP-3) for a period of time which was sufficient to
 - (xi) induce a second suicide ideation at the southeast corner of Thompson Lane and River Road in Edgewater, NJ about 0.7 miles from his Cliffside Park, NJ residence (consistent with the CIA pattern of practice documented by the 1975 and 2014 Senate Intelligence Committee reports at paragraphs 337-341, followed by
 - (xii) preparation and filing of litigation in Newark federal court in June 2010,
 - (xiii) a notice to vacate from CHALOM (USMS) in July 2010,
 - (xiv) rejection and misdirection from Bergen County, NJ homeless shelter to a non-existent homeless shelter on October 1, 2010, a mental distress call to 911, which led to

- (xv) involuntary commitment represented as being for fourteen days, which was actually kidnapping to confinement (paragraph 808), at Bergen Regional Medical Center, Paramus, NJ, after an alleged hearing with no knowledge of any hearing and no prior contact with the “legal counsel” who had allegedly represented the Lead Plaintiff at that supposed October 2, 2010 hearing, which contact occurred about five days after Lead Plaintiff’s entry to the locked facility.

I. Defendants ROSENBERG, ROSS, CHALOM, PANKOWSKI, MODDERMAN, and UNITED STATES’ orchestration of these events was again intended, as in past events, to maximize emotional distress. These acts, violations, and injuries were and are intended to operate psychologically together to maximize gratuitous cruelty. MODDERMAN’s whereabouts are currently unknown to Lead Plaintiff but are very likely known to police powers defendants including defendant UNITED STATES, and are known to the Manhattan, New York City District Attorney’s office.

J. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants’ long-running schemes, frauds, and swindles to sustain defendant UNITED STATES’ involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953).

Paragraph 604 HEXP-1 subparagraph I is incorporated herein by reference. Paragraph 608 HEXP-5 subparagraphs C, D, E are incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	16-18
Complaint paragraphs:	337-341, 466; 464, 505, 519, 526, 555, 560; 603B, F, G, L NSEC-4; 606, 608, 613, 618, 619 HEXP-3, 5, 10, 15, 16; 634C RGTS-14; 641, 642, 656 RICO-3, 4, 18; 802B, 821, 839, 842B(ii)
Appendix 2 paragraphs:	1-031, 1-032
LPEE Table 2 pages 12023-12120 paragraphs:	2-0148, 2-0149
LPEE pages (see technical note on page numbering at paragraph 230):	10335-10342, 10346-10351, 10394-10422, 10428, LPEEV65-5, 6, 7
Emails and documents by topic and date, also located in LPEE:	Match Group Second Notice re Preserve Evidence 220122, Match EPL Response 221110, Match Group Legal Dept Email 221110, MODDERMAN email re PANKOWSKI wedding Drumm attends 080625, MODDERMAN email re PANKOWSKI wedding Drumm attends 312pm 080625, MODDERMAN re wedding 080626, MODDERMAN email re PANKOWSKI wedding Drumm attends 817am 080627

612. HEXP-9 Illegal Human Experimentation: Personal and Intimate Relationships - Orchestrated Romantic Interests, Induced Fraudulent Relationship, Laura 2014-2018

A. As forensically reverse engineered, defendants used online dating platforms, including Match Group websites and the Bumble.com website, or their spoofing by an unknown

defendant police powers operation to screen-in and screen-out women between 2011 and 2014, and to arrange a fraudulent online relationship with Laura AKOTO, ostensibly a resident of Ghana from 2014 into 2018. “Laura” was actually an online psychological operation and illegal BRMT bioweapon and bioweapon delivery system oxytocin hijacking, using personal and salacious photos sourced online from a website which featured a female who was actually from Broward County, Florida and sold photos and access online.

B. As forensically reverse engineered, Lead Plaintiff encountered an online dating match from the greater New York City area in 2014 while living in Ramsey, NJ. As that online discussion procced, it turned out that the white female “Laura” who lived in “Ghana.” Over time and through a sequence of illegal BRMT oxytocin (“love” hormone) hijackings, defendant UNITED STATES combined email and wire frauds with illegal BRMT oxytocin (love hormone) hijacking to orchestrate and sustain theft of more than \$14,000 via Western Union and by using other money transfer sites which permit anonymous pickup of cash; as well as two cell phones, LPEE pages 7845 mailed Sep. 9, 2015, 7824 mailed Nov. 15, 2015, a PlayStation 1, and game cartridges, all sent by unwitting Lead Plaintiff to Ghana, addressed to Prince B. Quaye, Agona Swedru, Ghana as directed by Laura AKOTO. This allowed defendant CIA agents or assets two clean cutout phones, game hardware and cartridges for use in Ghana. International postal services were used to deliver these hardgoods to Ghana. Around 2017, Laura asked Lead Plaintiff to relay payments among two international parties through his US bank account. He agreed to do this, and later expressed discomfort, and halted the practice after one or two transfers, specific emails below:

AKOTO Laura re \$2K to Mr Prince from Porter Patten \$3K 171021,
AKOTO Hints of money laundering entrap scam 171025,

C. In 2018, Lead Plaintiff discovered that the entire relationship was an online hoax which had been boosted by the yet to be identified illegal BRMT bioweapon and bioweapon delivery system using oxytocin hijacking, wherein defendant CIA used video feeds which it originated illegally so its BRMT operators could determine the timing of these oxytocin “love” hormone boosts. This had been combined with the 2017 defendant FBI structured payments entrapment attempt at subparagraph 612B above. Laura was actually nothing more than an online persona based upon ordinary and salacious pictures of a Broward County, Florida resident who sold the salacious pictures online, as Lead Plaintiff eventually discovered by using a Google photo-match search tool in 2018.

D. This ability to remotely manipulate human behavior completely online to and including monetary thefts by using illegal BRMT bioweapon and bioweapon delivery system remote hijacking of oxytocin represented illegal progress in the effectiveness of BRMT’s neurological hijacking of its victims, which went well beyond the previous in-person illegal BRMT hijackings demonstrated in prior interpersonal relationship orchestrations and breakups in the 1980 into early 2000s, to total remote hijacking of the human victim by 2014. Prior progressions of the illegal BRMT program from (i) on-site hijackings at age 12 through 18 (in the late 1960s to early 1970s) to (ii) remote triggering of a local device by cell phone around age 30 (mid-1980s) was emblematic of the technological progression of the illegal BRMT system over that time. This clearly demonstrates the intentional, malicious, and psychopathic progression of the illegal BRMT bioweapon and bioweapon delivery program overall to leverage neuroscience and technical progress in way which Nazi Doctor Josef Mengele could only have wildly fantasized when he was trying to create the perfect Nazi soldier with experiments on involuntary human subjects in the Dachau Concentration Camp system in

western Europe. Recall that this set of principles undergirded CIA's Dr. Sidney Gottlieb's quest for mind control through MKUltra from 1953-1973 (paragraphs 61-67, 308-311, 332-341, 357-364, Interline Exhibit 3), which defendant CIA has never renounced.

E. Defendant UNITED STATES most probably employed this method of extreme illegal BRMT biomedical abuse to orchestrate the murder of Audrey Brewer in September 2011 (paragraph 10) using an physically and emotionally abused female intermediary as the direct perpetrator while acting in apparent extreme rage under the direct influence of the illegal BRMT bioweapon system used to physically hijack her rate of pineal gland extreme adrenaline surge (adrenaline fight or flight hormone) to provoke the knife slashing attack which resulted in Audrey Brewer's death from the slashing of her carotid artery in her neck. The female perpetrator had absolutely no history of violence at any time but was also being psychologically provoked by the psychologically manipulative male who was involved in the relationships with both women at various times. The psychological abuse by the apparent perpetrator was used in the moment to conceal the illegal BRMT bioweapon and bioweapon delivery system and its human operator from detection as the actual perpetrator of the extreme biomedical hijacking.

E. This momentary sense of extreme rage which was most probably experienced by the knife wielder is comparable to the momentary biochemical rage induced in Lead Plaintiff by the illegal BRMT bioweapon and bioweapon delivery system in the August 2023 Manhattan Subway Tunnel Flash Incident documented at paragraph 619 HEXP-16, LPEE pages 11668 and during an unrecorded incident adjacent to Lead Plaintiff's residence between August 2008 and October 2010 in Cliffside Park, NJ. The intent of defendant UNITED STATES (CIA) in orchestrating this process against US persons would have been and would be to facilitate its future deployment against others which it targets for assassination.

F. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 604 HEXP-1 subparagraph I is incorporated herein by reference. Paragraph 608 HEXP-5 subparagraphs C, D, E are incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	10, 61-67, 308-311, 332-341, 357-364, 619 HEXP-16
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0171, 2-0179 through 2-0181, 2-0185
LPEE pages (see technical note on page numbering at paragraph 230):	7467-8179 (2014-2018), and 2023 Financial Times photo confirmation of identity at 7470-7470A, 11668, LPEEV65-1
Emails and documents by topic and date, also located in LPEE:	AKOTO re AltaVista bad actor 161018, AKOTO re BLACKPOOL then DD 170315, AKOTO Laura re \$2K to Mr Prince from Porter Patten \$3K 171021,

	AKOTO Hints of money laundering entrap scam 171025, AKOTO Ramsey Fixup Expenses 171027 AKOTO Mailing Address 150101.pdf
--	---

613. *HEXP-10 Illegal Human Experimentation: Personal and Intimate Relationships - Orchestrated Romantic Interests, Induced Fraudulent Relationship, GIA (Norelle Dean) 2019-2021*

A. As forensically reverse engineered, defendants used online dating platforms, including those of Match Group and Bumble, or their spoofing by an unknown defendant police powers operation to screen-in and screen-out persons of interest to Lead Plaintiff to arrange the introduction of their co-conspirator whether by choice or coercion. Except for the first female who was a white person, allegedly from the nation of Georgia, all fifteen or so participants were Black females of varying backgrounds and employment from entertainment clubs to medical school, belying their purposeful screening in by police powers defendants for this purpose, most likely to attempt to manipulate the Lead Plaintiff into some racially oriented speech or conduct, which pattern has been seen repeatedly since that time.

B. Defendants then arranged a fraudulent relationship between Lead Plaintiff and Norelle Dean (GIA), aka Gia Shakur, aka Tina Rhinehart, whereabouts currently unknown to Lead Plaintiff, but known to defendants DOJ, FBI, USMS, CIA and various other police powers defendants in the greater New York City area. Lead Plaintiff had dates with this New York City resident in New York City and in Edgewater, NJ, along with one trip to New Orleans, LA, all of which required at least one of the two parties to engage in interstate travel. Lead Plaintiff spent over \$1,000 to travel and pay for meals and other entertainment during these fraudulent relationship dates, provided cash gifts including to assist in paying for a poetry workshop, purchased an Apple computer, and purchased an air ticket and hotel stay for a solo return trip to

New Orleans for GIA after their relationship was ended by GIA. The dates occurred between December 2019 and 2021 and are further described at LPEE Table 2 paragraph 2-0188.

C. Both this relationship with GIA in 2019-2020, and the relationship with MODDERMAN in 2008, paragraph 611 HEXP-8, included episodes of illegal BRMT sexual abuse by erectile dysfunction administered in accordance with a plan coordinated between CIA or elements of DOJ and these women. The sexual abuse herein and at paragraph 821 specifically includes defendants DOJ, FBI, USMS, and CIA, other unknown police powers and press, media, and entertainment defendants, and the individual officials and persons therein in their deliberate, knowing, and willful election to engage in sexual abuse,

D. These relationships were both also intended to slander, smear, libel, and interfere with contract rights of Lead Plaintiff in orchestrating fraudulent relationships, using MATCH GROUP websites either administered for their benefit or spoofed by them, for the corrupt purposes of developing salacious sexual content which included Lead Plaintiff, and through their public availability were intended to humiliate, smear, and defame Lead Plaintiff as an element of their criminal intent and conspiracy to construct a defamatory narrative about Lead Plaintiff, and to prevent him from pursuing his own interests which have and do contradict that corrupt narrative.

E. This coercive psychological game plan has also been run repeatedly by these defendants since at least 2004, featuring other ethnicities and races who are screened in and clustered for provocative purposes. This pattern is psychologically consistent with other patterns of practice resembling psychopathy described at paragraph 820O-Q.

F. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running

schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 604 HEXP-1 subparagraph I is incorporated herein by reference. Paragraph 608 HEXP-5 subparagraphs C, D, E are incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	16-18
Complaint paragraphs:	10, 464, 505, 519, 526, 555, 560; 603B, F, G, L NSEC-4; 608, 613, 618, 619 HEXP-5, 10, 15, 16; 634C RGTS-14, 802B, 821, 839, 842B(ii)
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0188 through 2-0192
LPEE pages (see technical note on page numbering at paragraph 230):	10256-10258, 11668, LPEEV65-1, LPEEV65-5
Emails and documents by topic and date, also located in LPEE:	Gia first date 211207 (note actual date was in 2019) Match Group Second Notice re Preserve Evidence 220122, Match EPL Response 221110, Match Group Legal Dept Email 221110

Biological and Medical Invasions – Personal Humiliation, Endangerment, Illness

614. HEXP-11 Illegal Human Experimentation: Personal and Intimate Relationships - Orchestrated Romantic Interests, BRMT Induced Erectile Dysfunction 2005, 2008, 2020-2021

A. As forensically reverse engineered, defendant UNITED STATES used intimate relationships between Lead Plaintiff and a series of women in 2005, 2008, and 2020-2021 to field deploy increasingly sophisticated BRMT functionality against the Lead Plaintiff by inducing erectile dysfunction (ED). In 2005, two dates resulted in ED failures (BRMT induced). In 2008, BRMT was again induced but offset by the prescription medication tadalafil. In 2020 into 2021, defendant UNITED STATES again used its BRMT bioweapon and bioweapon delivery system to induce a progression of ED symptoms despite the tadalafil medication, indicating that BRMT bioweapon sophistication had evolved by that time to be much more granular in its effects on the brain, central nervous system, and muscular control required to attain and sustain an erection, as a variety of conditions could be induced and reversed in the moment as desired by the operator.

B. Periodically throughout and after each of these cycles, Lead Plaintiff's erectile dysfunction has completely disappeared, directly indicating that the ED symptoms were explicitly due to illegal BRMT bioweapon intervention. This BRMT direct control acts through the brain and the central nervous system to affect control of the muscles which control blood flow in the penis. Managed in the moment by a human operator, an employee of defendant UNITED STATES, most probably defendant CIA, this individual operator observing the intimate scene (using a locally embedded fiber optic camera, a PC camera, an infrared camera through non-metallic curtains, and other such options, or a coordinated verbal code with the accomplice in the scene) determines the specific timing of each BRMT ED intervention, electing

an outcome which in its most modern form can vary the degree and duration of the erection at the operator's command. Accomplishing this result required coordination among the personnel with direct operational control of the illegal BRMT bioweapon and bioweapon delivery system, field personnel - agents, confidential informants, or other consenting parties willing or coerced to engage sexually with the Lead Plaintiff.

C. Wire frauds were used to orchestrate all these sexual dates, some of which were the subject of other sub-counts in this Complaint. Lead Plaintiff expended personal funds on travel and entertainment during these fraudulent relationship dates.

D. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 604 HEXP-1 subparagraph I is incorporated herein by reference. Paragraph 608 HEXP-5 subparagraphs C, D, E are incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at

pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	Not applicable
Appendix 2 paragraphs:	1-060
LPEE Table 2 pages 12023-12120 paragraphs:	2-0115, 2-0148, 2-0188 through 2-0190
LPEE pages (see technical note on page numbering at paragraph 230):	1 et al, 140 et al
Emails and documents by topic and date, also located in LPEE:	Not applicable

615. *HEXP-12 Illegal Human Experimentation: BRMT Orchestrated Personal Movements and Orchestrated Activities*

A. 2008: As forensically reverse engineered, illegal BRMT bioweapon inducement of strong anxiety in advance of a film festival in Telluride, CO which Lead Plaintiff had arranged, then cancelled as shown at LPEE pages 10365-10375 while employed at ESTABLISH, is emblematic of this pattern of illegal BRMT bioweapon and bioweapon delivery system biochemical emotional hijackings. This anxiety-induced vacation cancellation came in May 2008 after an earlier Winter 2008 ski vacation to Park City, UT. The Park City, UT solo ski trip was used by defendant UNITED STATES to arrange an “incidental” view of classified pulse jet technology in flight operations during this early 2008 trip on the day before Lead Plaintiff visited the Hill Air Force Base Museum near Ogden, UT. See other examples of this type of physical and logistical movement intervention and control herein using the illegal BRMT brain hijacking system. These illegal manipulations are a daily occurrence to Lead Plaintiff by defendant UNITED STATES’ use of its illegal BRMT bioweapon and bioweapon delivery system to hijack and sustain involuntary servitude of Lead Plaintiff in his daily life as described herein.

B. 2018-2023: As forensically reverse engineered, defendant UNITED STATES used the illegal BRMT bioweapon and online websites which it controls or spoofs including, without limitation, EventBrite and Club Free Time. These defendant UNITED STATES and other defendant police powers connected and manipulated activities and internally programmed events (which have and do incorporate press, media, and entertainment defendants who are permitted special access) most probably began in November 2018 or early 2019 (soon after Lead Plaintiff's human trafficking from Ramsey, NJ to Edgewater, NJ (paragraph 648 RICO-10) and continued until December 2023, as partially documented at LPEEV65-5, when the accessibility was to events was terminated as the reservation system used to receive the discount ticket was no longer accessible and complaints to Club FreeTime were met with no resolution. Other prior evidence of this specific conduct was deleted by defendant UNITED STATES from Lead Plaintiff's Outlook calendar in early September 2023.

C. These events and activities were intended to manage, direct, and control Lead Plaintiff's movements, and to organize controlled in-house events and schedule non-existent events for the purposes of developing specific narratives about personal interests, arranging fruitless travel to non-existent events to frustrate Lead Plaintiff, to organize delivery of verbal threats, and for other purposes (see LPEE pages 420, 456-459, 460-464, 543, 548-563, 564-571, 575-597, 598-606), all for the convenience of the defendants and to sustain management, control, direction, and frustration of the Lead Plaintiff including, without limitation:

- (i) managing venues and internally crafted and orchestrated events and performances performances to sustain isolation and attempt to introduce its own personnel for the purpose of controlling Lead Plaintiff's activities and associations with others,

- (ii) to foster a sense and reality of physical and emotional isolation and magnify a sense of aloneness,
- (iii) to impose control of daily movements as basic as the timing of shopping trips so orchestrated events, including, without limitation, contaminated foods (such as bagged spinach, milk, and brats), and stockouts of common products such as cereals and vegetables, could be orchestrated; and so field harassment sequences such as aisle blocking, physical obstacles, and personal obstructions, including knowing endangerment of fragile elderly persons by police powers defendants while the Lead Plaintiff has been subjected to illegal BRMT hijacking using elevated adrenaline (enhancing flight, fight, and anxiety as elderly people blocked his path in ACME market in Edgewater, NJ and other locations) have been run by field personnel and volunteers at all hours of day and night;
- (iv) to purposefully misdirect non-randomized directed walks which have and do include psychological operations by flipping Lead Plaintiff's sense of direction in New York City and by orchestrating apparently random walk paths using illegal BRMT brain hijacking at the moment of direction of travel decision;
- (v) to manage the timing of his arrival at events or his missing of events;
- (vi) to elect and cancel Lead Plaintiff's routine and vacation travel, and many other activities and actions inside his personal residence and in public places.

D. October-November 2023: A 20 day event sequence captured in Lead Plaintiff's notes from October 10, 2023 to November 8, 2023 incorporated herein as LPEEV65-3, is emblematic of overall police powers conduct across multiple jurisdictions in federal, state, and local governments since departure from CNA in September 2002. This specific event sequence

includes three local police powers operations (PAPD, DC, NYPD) in coordination with the defendant UNITED STATES BRMT team to create a street level narrative of an emotionally disturbed person (Lead Plaintiff) which were run during an October 10, 2023 trip to file letters and documents in Congressional offices in Washington, DC (LPEE pages 12121-12149), then a Complaint in the federal court in the Southern District of New York (23-cv-09605, Appendix 1 – Prior Filings History), then a series of local events in and around New York City (LPEEV65-3).

E. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants’ long-running schemes, frauds, and swindles to sustain defendant UNITED STATES’ involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 604 HEXP-1 subparagraph I is incorporated herein by reference. Paragraph 608 HEXP-5 subparagraphs C, D, E are incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	648 RICO-10, Appendix 1 – Prior Filings History
Appendix 2 paragraphs:	Entirety
LPEE Table 2 pages 12023-12120 paragraphs:	Entirety
LPEE pages (see technical note on page numbering at paragraph 230):	420, 456-459, 460-464, 543, 548-563, 564-571, 575-597, 598-606, 10365-10375, 12121-12149, LPEEV65-3, LPEEV65-5
Emails and documents by topic and date, also located in LPEE:	New York Cares Library Bowling Outing 080815

616. *HEXP-13 Illegal Human Experimentation: Reckless Endangerment Through BRMT Induced Defamation*

A. As forensically reverse engineered, defendant UNITED STATES has and does engage in decades long protracted coercive psychological operations and illegal BRMT bioweapon and bioweapon delivery system biochemical hijackings of Lead Plaintiff's words and actions from approximately 2000, which have been and are intended to and do publicly defame and mischaracterize the Lead Plaintiff's own natural personal pattern of conduct when not being directly subjected to coercive psychological operations and/or illegal BRMT bioweapon and bioweapon delivery system hijacking. Combined with defendant UNITED STATES' (i) careful pre-texting of Lead Plaintiff in national security matters, which accelerated after the September 11, 2001 terrorist attack allowed them new powers and virtually free reign to trample "unalienable" rights, (ii) their purposeful public internet exposure of Lead Plaintiff, and (iii) general public and police powers paranoia surrounding defendant United States' explicit documented failure at defendant FBI to interdict the 9/11 attack by disrupting the aircraft hijackers during training, these illegal BRMT bioweapon and bioweapon delivery system hijackings have and do recklessly endanger the Lead Plaintiff's life and those who surround him, both members of the public and necessary undercover security now commonly required. Both deliberately malign police powers operations and public vigilantism have and do endanger and

have been and are used in numerous attempts to defame and discredit the Lead Plaintiff in the view of the general public and to attempt to exculpate these defendants.

B. Defendants UNITED STATES, primarily acting through defendants CIA, FBI, and USMS, and unknown co-conspirators who are almost certainly other police power departments and agencies, has and does engage in making and acting, directly and indirectly in threats and violence which is not directly attributable, and by engaging themselves and others through their agents, in public mayhem in an effort to attract a violent event directed specifically at Lead Plaintiff. Within one four month period in 2022, defendants (i) made an indirect verbal threat on the Lead Plaintiff in a New York City performance space on July 16, 2022 as described at Interline Exhibit 15A; (ii) a mass transit derailment attempt initiated just after sundown while traveling toward the setting sun in the train engineer's eyes at 50-60 mph against an express train operating on the Metropolitan Transportation Authority Hudson River Line on September 11, 2022 with the Lead Plaintiff as a passenger as described in paragraph 707 LETHL-14 (Interline Exhibit 15B), (iii) upon the Lead Plaintiff in defendant NYC (City of New York) Morningside Park on September 17, 2022 while using the illegal BRMT bioweapon and bioweapon delivery system, as described at paragraph 708 LETHL-15 (Interline Exhibit 15C), and (iv) on NYC (New York City) streets with their streetlights deliberately extinguished on November 18, 2022, and by a rapidly accelerating vehicle in a BERGEN (Bergen County) New Jersey shopping center parking lot on November 19, 2022 as described at LETHL-16 while traveling to and from theater performances (see also Interline Exhibit 15D, and these two specific theater performances listed at LPEEV65-5). The Bio-Lab arson fire and US Airways Flight 1549, paragraphs 602 NSEC-3, 606A-D HEXP-3, 673 RICO-35, both proximate to the Lead Plaintiff in relationship (Bio-Lab, paragraph 602 NSEC-3) or location (US Airways 1549, paragraph

606B, C, D HEXP-3), are elements of this overall pattern of domestic violence and sabotage intended by defendant UNITED STATES to create the appearance of mayhem and violence following the Lead Plaintiff, consistent with defendant's other unfounded rumors and misdirection intended to skyline Lead Plaintiff as the root cause of this violence, which these defendants themselves directly created to conceal their other illegal acts and misdirection. Discovery will provide further specific evidence relevant to each noted incident and more incidents of such acts, both survived and likely not survived, by members of this class of plaintiffs. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs.

C. Defendants also created other false allegations against Lead Plaintiff including, without limitation, (i) of pedophilia which they acted out using the children of police powers personnel in volunteer outings with New York Cares, and in psychological operations conducted using the illegal BRMT bioweapon and bioweapon delivery system (paragraphs 526, and in full knowledge of his actual conduct as described at paragraph 839) to create false public impressions of the Lead Plaintiff; (ii) with sex traps and female officers who preceded him on his walks in New York City, and on buses, subways, and trains. Their intent and purpose has been and is to create and sustain false narratives intended to slander, libel and defame the Lead Plaintiff. Defendants (iii) have and do interfere with contract rights with dating sites and public venues for this purpose (paragraphs 505, 608 HEXP-5); and (iv) have constructed and did sustained for years a terror narrative (paragraphs 464, 519, 555, 560, Interline Exhibits 17-18, 603B, F, G, L, 634C, 802B, 839) for the purposes of endangerment, libel, and slander of Lead Plaintiff; (v) caused an event of forced public urination by coordinated police powers operations (paragraph 618 HEXP-15); (vi) orchestrated and provoked an illegal BRMT bioweapon and

bioweapon delivery system flash temper attack coordinated with undercover police powers personnel (paragraph 619 HEXP-16); and (vii) have systematically misdirected public narratives and public opinion, and deliberately misdirected the actions of co-conspirator defendants, all as misdirection for defendant UNITED STATES' own slander, libel, misrepresentation, deceit, interferences with contract rights, and other myriad acts, violations, and injuries of Lead Plaintiff's rights as described in all sections of this complaint.

D. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 604 HEXP-1 subparagraph I is incorporated herein by reference. Paragraph 608 HEXP-5 subparagraphs C, D, E are incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	17-18
Complaint paragraphs:	419-584; 603B, F, G, L NSEC-4; 608, 618, 619 HEXP-5, 15, 16; 634C RGTS-14; 802B, 839
Appendix 2 paragraphs:	1-027 to end
LPEE Table 2 pages 12023-12120 paragraphs:	2-0083 to end
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 368-793
Emails and documents by topic and date, also located in LPEE:	Not applicable

617. *HEXP-14 Illegal Human Experimentation: BRMT Induced Adverse Medical Reactions, Symptoms, and Illnesses 1980 to present*

A. As forensically reverse engineered, Lead Plaintiff has and does experience notably atypical progressions of medical symptoms, quite unnatural to their normal progressions in medical presentation, to wit, the nasal allergy and eye aging progressions documented here. Other abnormal progressions related to the illegal BRMT bioweapon and bioweapon delivery system include unusual excess hormone production spikes, extreme unexplained illness symptoms upon return from London in 1994 or 1995 which led to life threatening deep vein thrombosis (severe blood vein clotting), symptoms of non-Hodgkins lymphoma detected in glandular swelling under both armpits in August 2007, and other symptoms noted in the referenced evidence.

Persistent Atypical Allergy Symptoms

B. Allergy symptoms, which in the early 1980s abruptly presented then later mysteriously disappeared despite having lived in the exact same environment with evergreen trees since birth, were diagnosed by a Redmond, Washington allergist as a primary allergy to deciduous trees, despite the near complete absence of deciduous trees in Lead Plaintiff's normal living environment. The problem steadily worsened from the 1980s through 2005 in Washington

state (nicknamed the Evergreen State for the obvious reason its trees are almost 100% evergreen trees). The condition required persistent nasal and oral steroid use and resulted in frequent nasal infections and antibiotic use.

C. During this worsening allergy progression, nasal surgery was performed in the early 1990s in the same Evergreen Surgical Center medical building where defendant BURNS allegedly had his OB/GYN medical practice adjacent to Evergreen Hospital in Kirkland, Washington. The nasal surgery may have been used to conceal a surreptitious implantation in the sinus cavity of a passive RF device used in the further development of illegal BRMT brain hijacking system to improve location accuracy for placement of remotely administered BRMT brain hijacks as the system was evolved from a local device to a remote device. Passive radio frequency devices (implanted and applied passive RF “chips”) are now commonly used in animal identification systems, in entrance control systems, to identify and track physical assets like computers, forklift, and trucks, and to locate and control inventory.

D. The extremely persistent allergy symptoms described above changed dramatically, in a very unexpected and medically unnatural direction, after Lead Plaintiff was human trafficked by the FBI wrecking progression from Kirkland, Washington and its millions of fir, hemlock, and cedar evergreen trees to Boston, Massachusetts on December 24, 2005. Boston is a heavily treed city with millions of deciduous trees. Lead Plaintiff’s medically diagnosed allergy, supposedly to deciduous trees, nearly vanished and has never again presented in any particularly notable manner though today, even when Spring and early Summer pollen loads are heaviest, despite deciduous trees being almost the only trees near any of his residences in the Boston and northern New Jersey area from 2006 to today.

Unexplained Bleeding From Eardrum

E. Lead Plaintiff also noted an overnight hemorrhage from his left ear after a full night's sleep sometime later while Jeanette was still present in the 149th Street, Kirkland, WA house. There was no reasonable medical explanation for a near sea level eardrum break resulting in bleeding in the middle of the night in a healthy 40-45 year old with no history of ear infections, no audiology issues, and no earache or pressure being experienced during that period, and despite nearly a million air miles over several prior decades. The Lead Plaintiff's persistent head tilt to the left for many years was likely used as a field identification method, as his disturbed equilibrium from a device implanted in the left ear caused a persistent head tilt to the left, which was used to make him easier for field observers to identify during a development phase to test a new illegal BRMT bioweapon and bioweapon delivery system set of pulsed commands. A possible hardware upgrade is another feasible explanation, though less likely, for this medically implausible event.

F. Since medical software can be hacked to conceal medical issues by surreptitious means, an independent MRI using medical technology and software securely furnished by the manufacturer, is required to establish whether this smoking gun evidence is present in Lead Plaintiff's sinuses and/or ear canal.

Strong Headaches, Presbyopia, And Atypical Reversal Of Presbyopia

G. Further to improbable organic medical explanations for synthetically driven BRMT related medical sequences, Lead Plaintiff began experiencing strong headaches a few days after joining CNA Industrial Engineering in November 1996. Defendant FAUCI first appeared soon thereafter to the unwitting Lead Plaintiff posing as CNA founder Larry Cook, identified in 2024 as the executive program manager of the illegal BRMT bioweapon and bioweapon delivery system from at least 1996 forward for an unknown number of years. Lead Plaintiff's visit to an

optometrist resulted in a moderate strength bifocal prescription, consistent at age 51 with normal aging. Subsequent visits continued this normal age related progression until 2008. However, since 2008, Lead Plaintiff has been informed on each successive visit that his prescription strength was being reduced, through and including at his most recent vision check-up in 2022. This vision progression since 2008, as verbally represented by his eye doctors and in their written prescriptions, directly contradicts the normal progression over time of virtually everyone who must use prescription eyewear.

H. These unexplained and reversing progression are atypical, and further circumstantial evidence of defendant UNITED STATES' manipulations of medical symptoms through illegal BRMT bioweapon and bioweapon delivery system biomedical abuses to sustain these adverse medical reactions, stresses, and deliberately contriving sinus symptoms and the resultant infections in Washington state in order to orchestrate sinus surgery as it continued its illegal involuntary servitude and illegal medical subjugation and victimization of Lead Plaintiff.

I. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953).

Paragraph 604 HEXP-1 subparagraph I is incorporated herein by reference. Paragraph 608 HEXP-5 subparagraphs C, D, E are incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	419-584
Appendix 2 paragraphs:	Entirety
LPEE Table 2 pages 12023-12120 paragraphs:	2-0001, 2-0002, 2-0013, 2-0014, 2-0022, 2-0026, 2-0028, 2-0065, 2-0067, 2-0076, 2-0099, 2-0115, 2-0131, 2-0150, 2-0153, 2-0189, 2-0193, 2-0196, 2-0197, 2-0198, 2-0200, 2-0202, 2-0213
LPEE pages (see technical note on page numbering at paragraph 230):	10306-10310, LPEEV65-3
Emails and documents by topic and date, also located in LPEE:	Not applicable

618. *HEXP-15 Illegal Human Experimentation: BRMT Forced Public Urination Sequence, 2022*

A. As forensically reverse engineered, defendant UNITED STATES, CIA, NYPD, with MTA, orchestrated a forced public urination sequence using BRMT after Lead Plaintiff attended a Saturday afternoon rally in Foley Square, NYC in 2022. The normal 10 minute subway return trip from Foley Square to Grand Central Terminal took an exceedingly long time, nearly 60 minutes, including the initial Foley Square subway station wait for a train which runs every 20 minutes on Saturdays. This permitted additional fluid to accumulate during the delay and required cross agency coordination between NYPD (perhaps incorporating embedded CIA personnel), the MTA train operator, and the CIA personnel who operate the illegal BRMT brain

hijacking device. See LPEE page 11667 for the detailed description of this specific forced public humiliation, which is consistent with defendant UNITED STATES' overall historical pattern of practice of discrediting, humiliating, and retaliating directly against whistleblowers and victims.

B. Further evidence of these BRMT bioweapon induced bodily reactions and responses is likely to be available through the discovery process, including the recovery of the Lead Plaintiff's own records currently in the hands of defendants, through deposition of defendant UNITED STATES' BRMT operator (a local CIA employee in the vicinity of Lead Plaintiff or a remote operator acting through a locally deployed person acting as a scout), as well as the routine internal reports of these incidents authored and controlled by defendants, particularly the classified BRMT bioweapon and bioweapon delivery system defendant UNITED STATES uses without Constitutional authority and in violation of rights, law, and ratified international treaties, and which operations comprise crimes against US persons. To the extent they have not been destroyed, medical records, likely including copies maintained by defendant UNITED STATES, its medical contractors and/or researchers, can also be discovered to validate these claims.

C. This type of coordination has been experienced frequently in other situations including, without limitation, performance spaces and seating arrangements, bus trip delays and cancellations, fraudulent bomb scares at Port Authority Bus Terminal, protracted Lincoln Tunnel delays not experienced except in episodic cycles having little or nothing to do with seasonal, holiday, or normal peak hour traffic patterns, documented elsewhere including, without limitation, at paragraphs 629, 630 RGTS-9, 10.

D. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude

over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953).

Paragraph 604 HEXP-1 subparagraph I is incorporated herein by reference. Paragraph 608 HEXP-5 subparagraphs C, D, E are incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	629, 630 RGTS-9, 10
Appendix 2 paragraphs:	1-067
LPEE Table 2 pages 12023-12120 paragraphs:	2-001, 2-0217
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 575-597, 598-606, 10372
Emails and documents by topic and date, also located in LPEE:	Not applicable

619. HEXP-16 Illegal Human Experimentation: BRMT Public Flash Temper Hijacking, 2023

A. Defendants orchestrated a dangerous Tunnel Flash Temper Hijacking using the illegal BRMT bioweapon and bioweapon delivery system to brain hijacking the Lead Plaintiff in a

pedestrian subway access tunnel under 42 Street near the Port Authority Bus Terminal in New York City, which hijacking caused a very abrupt and totally out of character action during a routine walk to catch a subway train, something the Lead Plaintiff does multiple times each week in the often crowded subway tunnels of New York City. Crowded conditions while walking are nothing new to someone who has spent over 16 years in the greater New York City area, so this was an extremely unusual reaction to an entirely normal situation by a highly emotionally stable person (paragraph 320e) is a cause for concern and alarm. A sudden flash of intense anger was caused and created by a BRMT hijacked extreme adrenaline flash, exposing the Lead Plaintiff and nearby pedestrians to risk of assault or injury from this deliberately hijacked action. This can pose the risk of a violent reaction, including by nearby undercover police powers personnel with weapons who do not recognize the true source of the disturbance or assault, and thereby result in severe injury or death. See the descriptive narrative at LPEE pages 11668-11670.

B. Further evidence of these BRMT bioweapon induced bodily reactions and responses is likely to be available through the discovery process, including the recovery of the Lead Plaintiff's own records currently in the hands of defendants, through deposition of direct witnesses, as well as routine internal reports of these incidents authored and controlled by defendants, particularly the classified BRMT bioweapon and bioweapon delivery system defendant UNITED STATES uses without Constitutional authority and in violation of rights, law, and ratified international treaties, which comprise crimes against US persons. To the extent they have not been destroyed, medical and other records, likely including copies maintained by defendant UNITED STATES, its medical contractors and/or researchers, can also be discovered to validate these claims.

C. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 604 HEXP-1 subparagraph I is incorporated herein by reference. Paragraph 608 HEXP-5 subparagraphs C, D, E are incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	320e
Appendix 2 paragraphs:	1-067
LPEE Table 2 pages 12023-12120 paragraphs:	2-0001, 2-0217
LPEE pages (see technical note on page numbering at paragraph 230):	Not applicable
Emails and documents by topic and date, also located in LPEE:	Not applicable

620. *HEXP-17 Illegal Human Experimentation: Biological and Medical Invasions – Food Borne Illnesses 2008-2010, 2018-2023*

A. As forensically reverse engineered, defendants orchestrated multiple episodes of food borne illnesses to Lead Plaintiff by arranging for spoiled food products to replace fresh refrigerated products on store shelves at ACME Market in Edgewater, NJ in 2008-2010 and again in 2020-2022. Bagged salads were contaminated with rotted and blackened spoiled spinach from 2008 through 2010, which risked potentially deadly salmonella and listeria infections. This pattern of illegal practice recurred in 2020-2022 in fresh milk and packaged Johnsonville sausage bratwurst which were allowed to spoil, then placed on the refrigerated dairy shelf for sale to the Lead Plaintiff shortly before he arrived. This contaminated food, which carried similar infectious disease risks was then removed before other customers could select them. This element, likely carried out by embedded personnel of USMS. (Edgewater, NJ is the location where Lead Plaintiff was again human trafficked by DOJ, FBI, and USMS in 2018 into the midst of the Senator Menedez corruption investigation described in this Complaint.)

B. All refrigerated foods which are spoiled originated at the ACME grocery store in Edgewater Commons shopping center in Edgewater, NJ. Some packaged foods originate there, and others are home delivered from WALMART in North Bergen, NJ. Emails evidencing Lead Plaintiff's correspondence with the parent company of the Acme Edgewater, NJ grocery store, Albertsons, customer service organization in 2020-2022 are no longer on the Lead Plaintiff's personal Hotmail.com email account as of the date this Complaint is being prepared, and were not deleted by the Lead Plaintiff, providing further indications of evidence tampering by defendant UNITED STATES.

C. Lead Plaintiff has also endured several episodes of vomiting from instant rice purchased and fulfilled through WALMART, North Bergen, NJ which was home delivered, so the chain of custody is not clear, as an uncontaminated purchased package could have been replaced before delivery by an embedded undercover agent or officer posing as the delivery agent. This was most probably deliberately mishandled after pre-cooking in a small batch so it would spoil before being dried and specially packaged in normal factory packaging but outside the normal production process.

D. Further evidence of these food borne illness induced bodily reactions and responses is likely to be available through the discovery process, including the recovery of the Lead Plaintiff's own records currently in the hands of defendants, through depositions, as well as routine internal reports authored and controlled by defendants, particularly the classified BRMT bioweapon and bioweapon delivery system defendant UNITED STATES uses. To the extent they have not been destroyed medical and other records maintained by defendant UNITED STATES, its medical contractors and/or researchers, can also be discovered to validate these claims.

E. This same malign harassing pattern of practice has been experienced frequently with other types of products, including, without limitation, mismarked and improperly sized clothing ordered and fulfilled online, remotely electronically hacked and defective printers which have been rendered unusable by these technical hacks, extreme tear resistance plastic packaging being used for ketchup and mustard condiment packaging at Rumsey Playfield, Central Park, New York City. These acts, violations, and injuries are used by police powers personnel to harass targeted persons and have been experienced with especially high frequency over the past three to four years, consistent with other patterns of misconduct described elsewhere throughout this

Complaint. This experience is typical of police powers abuses of government resources to harass targeted persons, particularly targeting whistleblowers exposing corrupt police powers practices.

F. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 604 HEXP-1 subparagraph I is incorporated herein by reference. Paragraph 608 HEXP-5 subparagraphs C, D, E are incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0001, 2-0006, 2-0151, 2-152, 2-0191
LPEE pages (see technical note on page numbering at paragraph 230):	Not applicable

Emails and documents by topic and date, also located in LPEE:	ACME emails are blocked by defendant UNITED STATES computer hack or deletion from electronic records
---	--

INDIVIDUAL RIGHTS VIOLATIONS AND CONSPIRACIES (RGTS series offenses which incorporate paragraph 504 at all subcounts herein by reference.)

Entrapments, Illegal Searches, and Willful Blindness

621. RGTS-1 Rights Violations: Entrapment/Incrimination Attempts, Inculcations - Stevens Pass 1980s, Longacres Murder 1980s, Pierce County Corruption Follow-on 1980s, Alistar Capital Probe 1996

A. Stevens Pass 1980s: As forensically reverse engineered, defendant UNITED STATES and its defendant co-conspirators engaged in an illegal BRMT brain hijacking operation which posed extremely dangerous personal risk to Lead Plaintiff's first spouse Lynne during a ski outing to Steven's Pass, Washington in the 1980s. This operation also posed a grave risk of false incrimination to the Lead Plaintiff.

B. Defendant UNITED STATES created this scenario by initiating a public argument initiated by Lead Plaintiff's first wife Lynne expressing a surprising verbal outburst toward the Lead Plaintiff. During his reply, Lead Plaintiff swept his left hand to his left from a centered position and knocked over a glass of red wine. His spouse Lynne rose explosively and angrily from the table (carefully timed illegal BRMT gives this result from an extreme adrenaline surge, as shown in the 2023 Tunnel Flash incident documented herein at paragraph 619 HEXP-16). She walked angrily from the basement café in the oldest Stevens Pass day lodge (now replaced by the much larger Granite Peaks Lodge) and began to walk west down Steven Pass Highway toward Kirkland, WA, where they lived about 68 miles away.

C. After loading the ski equipment on the car, Lead Plaintiff located Lynne walking down the north side of the highway about 1 mile west of the summit and stopped to persuade her to return to the vehicle for the ride home, about 75 minutes by car. Lynne reluctantly and angrily

got into the car after a brief conversation. Had the Lead Plaintiff angrily left his spouse walking on that highway that night, Lead Plaintiff believes it is likely his spouse would not have returned home alive. Though it did not occur to him then, this would have been the perfect setup of police powers witnesses in the basement café, and an angry events sequence for her mysterious disappearance and his probable incarceration as the prime suspect. See paragraphs 494-498, 600G through I, 609 HEXP-6, LPEE page 182.

D. During the 1980s, Lead Plaintiff functioned as a member of the unwitting clean-up crew who assisted with accounting and finance related projects which followed defendants FBI and USMS in, without limitation, the Longacres Racetrack, Renton, WA chemist murder, a Pierce County, WA public corruption probe, and dozens of other domestic surveillance projects and cover operations dressed as consulting projects. Lead Plaintiff was deliberately positioned to see a Christopher Boyce (the recaptured convicted Navy nuclear submarine spy) cameo as Boyce's USMS prisoner transfer caravan entered the secured underground transfer location in the Federal District Courthouse in Seattle, WA in August 1981. As Lead Plaintiff searched for funding to acquire Pacific Pipeline in 1996, John C.T. Conte (defendant FBI Seattle, WA deep cover financial intelligence) directed him to Alistar Capital, whose founder, Bud Greer, and his spouse were later jailed for contempt after transferring funds in violation of their fiduciary duty to Britannia Corporation, a Seattle-based apparel company. Lead Plaintiff was later subjected to an attempt to use this style of court sanction entrapment by defendants FBI and ROSENBERG as a King County Superior Court Order, setting aside a default judgement entered by attorney Michael Larson who had formed Allegent, LLC binding Lead Plaintiff and embedded defendant PRAY as co-managers, was used as a pressure tactic in the forced wrecking of Allegent, LLC during the course of the ShipNow litigation, paragraphs 275(i), 471(ii), 650 RICO-12. These

pretexting sequences are indicative of defendant UNITED STATES’ perpetual on-going effort to sustain its pattern of bad faith acts and the subjugation and involuntary servitude of the Lead Plaintiff. These acts are representative of acts, violations, and injuries of the constitutional and statutory rights of this entire class of plaintiffs.

E. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants’ long-running schemes, frauds, and swindles to sustain defendant UNITED STATES’ involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	445, 494-498, 600G through I, 609 HEXP-6, 619 HEXP-16, 675 RICO-35
Appendix 2 paragraphs:	Entirety
LPEE Table 2 pages 12023-12120 paragraphs:	2-0030

LPEE pages (see technical note on page numbering at paragraph 230):	140 et al
Emails and documents by topic and date, also located in LPEE:	Not applicable

F. These schemes and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants’ long-running schemes, frauds, and swindles to sustain defendant UNITED STATES’ involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4-12,16-19
Complaint paragraphs:	10, 104, 171, 275, 276, 301, 303, 320, 337, 374-375, 417-418, 424-436, 441, 445-449, 450-451, 457-462, 462-463, 464-466, 471, 481, 494-498, 490-584, 514-515, 516, 518, 522-524, 525, 526, 565, 600-603 NSEC-1-4, 604, 606, 609, 611, 612-620 HEXP-1-3, 6, 8-17; 622, 624-626, 628-632, 635, 636 RGTS-2, 4, 5, 6, 8-12, 15, 16; 638-693 RICO-1-55, 694-710 LETHL-1-17

Appendix 2 paragraphs:	Entirety
LPEE Table 2 pages 12023-12120 paragraphs:	Entirety
LPEE pages (see technical note on page numbering at paragraph 230):	1 et al, 140 et al, 368-794, 797-865, 934-1075, 6044-6084, 8453, 10187-10250, 10251-10255, 10259-10301, 10376-10393, 10423-10433, 10434-10444, 10614, 10620, 11630-11936, 11668, 12160-12232, LPEEV65-1, LPEEV65-3 through 16, 18
Emails and documents by topic and date, also located in LPEE:	See emails and documents listed at all relevant individual subcounts in HEXP series and all other subcounts in other series listed at Complaint paragraphs above. Certain emails are blocked by a defendant UNITED STATES computer hack.

622. RGTS-2 Rights Violations: Entrapment And Incrimination Attempts, Money Laundering - Alliance Nominee Cash Bank Deposit 1990, Akoto Structured Payments 2016-2017

A. 1990-1993: As forensically reverse engineered, as part of defendant UNITED STATES' intentional financial wrecking of Lead Plaintiff's company Alliance, which incorporated (i) fraudulent co-ownership and control through a nominee investor (David J. Carey as nominee, FBI, paragraphs 445-449, 649 RICO-11), (ii) fraudulent legal representation (HIBBS and Susan THORBROGGER, DOJ/FBI, both embedded at Short Cressman Burgess law firm, paragraphs 446; 626 RGTS-6, 649, 651, 653, 683 RICO-11, 13, 15, 45), (iii) fraudulent deprivation of government benefits (SBA bonding, paragraph 446, 471; 649, 653 RICO-11, 15), (iv) theft and compromise of receivables (Steve and Kerry Brewer, FBI, paragraphs 644, 650, 651 RICO-6, 12, 13), was then succeeded by (v) a Vancouver, B.C. fraudulent financing which failed (paragraph 653 RICO-15).

B. Defendant UNITED STATES made an approximately \$80,000 cash bank deposit at a U.S. Bank, N.A. branch on 14th Street NW, Auburn, WA in the middle of 1990, a few months after Lead Plaintiff purchased the assets of Steve's Maintenance. The physical deposit was made by Kerry Brewer (defendant FBI, no relation to Lead Plaintiff) in the presence of Lead Plaintiff

to an account intended to provide a cash deposit intended for the purpose of securing bid and performance bonding from a third path bonding company. Lead Plaintiff signed the IRS disclosure form for the cash deposit since it exceeded the \$10,000 non-disclosure limit which requires disclosure to IRS. The funds were deposited in an account under the signatory control of Kerry Brewer (not a corporate officer), not Lead Plaintiff (sole corporate officer). The funds were removed the following day by Kerry Brewer. An in-person IRS inquiry followed some days later at the company's office and was answered by Lead Plaintiff. No further follow-up occurred. This was an attempt by defendant FBI to attract the attention and interest of IRS. This was supposedly intended to replace the loss of SBA bonding (FBI fraud, paragraph 649 RICO-11). It was also intended to replace defendant FBI theft and forced compromised of receivables undertaken by Steve and Kerry Brewer (paragraph 650 RICO-12). But as it was an overnight event, it was piling on to the pattern of frauds then being perpetrated by defendant FBI, another aggravating circumstance of their overall associate-in-fact enterprise pattern of racketeering acts, in conspiracy with defendants CIA and BURNS, the cross street resident at the 149th Street Kirkland, WA residence which Lead Plaintiff shared with the fraudulently orchestrated surreptitious active duty deferred prosecution bisexual ARMY soldier (Jeanette) in violation of the *Third* Amendment, all with conspiracy and complicity of defendants KCSD and WASH.

C. Around mid-1991, as defendant FBI orchestrated the acceleration of asbestos abatement work on the Sea-Tac Airport Concourse B, C, D expansion project, which exacerbated cash flow problems (as a result of a quadrupling of the weekly payroll with 45 day cash flow receipts on billings) on the Sea-Tac Airport project, the Lead Plaintiff contacted the UT bonding company to request financial assistance, only to learn the Utah based insurance company had been seized by the Utah Insurance Commissioner. The insurance company was

actually most probably seized prior to use of it's otherwise empty of personnel company building and offices by defendant FBI during the Lead Plaintiff's good faith visit to secure initial bonding coverage, which was followed by defendant FBI fraudulent issuance of the performance bond on the seized insurance company's bond form. No financing support was forthcoming from the bonding company. The Lead Plaintiff then conducted a telephone search for factoring services, was rejected by numerous factors or by intercepted phone inquiries, and eventually located Pacific Financial Services, Bellevue, WA (with defendant FBI's "Henry Wozow" posing as President).

D. Pacific Financial Services took over the Sea-Tac Airport employee payroll function, but failed to pay employment taxes and state worker compensation insurance premiums and attempted to lay this responsibility back on Lead Plaintiff. An IRS agent visited Lead Plaintiff at home in Kirkland, WA during his recovery from deep vein thrombosis (DVT is a life-threatening condition), which DVT arose after a financing trip to London for PAN in 1994. Lead Plaintiff described the turnover to Pacific Financial Services of all payroll responsibilities which had occurred early in the course of the accelerated project. With the benefit of forensic reverse engineering and based upon pattern of practice, defendant FBI's clear intent was the financial wrecking of the company after it was sold into Lead Plaintiff's private hands (David Carey, "co-owner and investor," was a former Rainier National Bank SVP used by FBI as the intermediary for its investment of agency funds). Defendant FBI's clear intent, based upon the now identifiable pattern of practice was (i) to destroy the evidence of their illegal surveillance of the environmental services businesses in western Washington (violating the *Fourth* Amendment in criminal investigations), (ii) to entangle Lead Plaintiff in liability for unpaid federal 941 payroll taxes, and (iii) to perpetuate federal involuntary servitude of Lead Plaintiff in defendant

UNITED STATES' and its co-conspirators' associated-in-fact enterprise pattern of continued illegal BRMT human subject biomedical experimentation without consent, rights, and racketeering acts, violations, and injuries.

E. 2014-2018: As forensically reverse engineered, Lead Plaintiff encountered an online dating match from the greater New York City area in 2014 while living in Ramsey, NJ. As that online discussion proceeded, it turned out that the white female "Laura AKOTO" who lived in "Ghana." Over time and through a sequence of illegal BRMT oxytocin ("love" hormone) hijackings, defendant UNITED STATES combined email and wire frauds with illegal BRMT oxytocin (love hormone) hijackings to orchestrate and sustain theft of more than \$14,000 via Western Union and by using other money transfer sites which permit anonymous pickup of cash; as well as two cell phones, LPEE pages 7845 mailed Sep. 9, 2015, 7824 mailed Nov. 15, 2015, a PlayStation 1, and game cartridges, all sent by unwitting Lead Plaintiff to Ghana – (a defendant CIA agent or asset), addressed to Prince B. Quaye, Agona Swedru, Ghana as directed by online pseudonym Laura AKOTO, actually to defendant CIA agent or asset clean cutout phones for use in Ghana, also tightly correlated to illegal use of Lead Plaintiff's U.S. passport per CPB travel record (LPEE page 540) where Lead Plaintiff supposedly departed to Dubai as planned on May 2, 2015. This trip was planned, and the air ticket purchased by Lead Plaintiff, but cancelled at the last moment due to defendant UNITED STATES orchestrating and directing a fraudulent financing in that region to Lead Plaintiff, and then demanding a known to be unaffordable advance fee a few days prior to the Lead Plaintiff's already paid and scheduled departure. The air ticket was used by a defendant CIA agent or asset traveling on Lead Plaintiff's passport. International postal services were used to deliver the hardgoods to Ghana later in 2015. Around October 2017, Laura asked Lead Plaintiff to relay payments among two international parties

through his US bank account. He agreed to do this, and later expressed discomfort, and halted the practice after one or two transfers, specific emails below:

AKOTO Laura re \$2K to Mr Prince from Porter Patten \$3K 171021,
AKOTO Hints of money laundering entrap scam 171025,

F. Lead Plaintiff discovered in 2018 that the entire relationship was an online fraud boosted by illegal BRMT bioweapon and bioweapon delivery system oxytocin hijacking (defendant CIA used video feeds which it originated illegally so its BRMT operators could determine the timing of oxytocin “love” hormone boosts to serve its illegal purposes in delivering funds and hardgoods from Lead Plaintiff to its Ghana asset in 2014-2017) which was followed with a defendant FBI structured payments entrapment attempt in 2017. Laura was actually nothing more than an online persona based upon ordinary and salacious pictures of a Broward County, Florida resident who sold the salacious pictures online, as Lead Plaintiff eventually discovered by using a Google photo-match search tool in 2018 (LPEE pages 7467-8179).

G. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants’ long-running schemes, frauds, and swindles to sustain defendant UNITED STATES’ involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets

privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953).

Paragraph 621 RGTS-1 subparagraph F is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	445-449, 471; 626 RGTS-6; 644, 649, 650, 651, 653, 683 RICO-6, 11, 12, 13, 15, 45
Appendix 2 paragraphs:	Entirety
LPEE Table 2 pages 12023-12120 paragraphs:	Entirety
LPEE pages (see technical note on page numbering at paragraph 230):	7467-8179
Emails and documents by topic and date, also located in LPEE:	Certain emails are blocked by a defendant UNITED STATES computer hack

623. RGTS-3 Rights Violations: Entrapment and Incrimination Attempts – FBI/CIA/CSIS/RCMP VSE Pink Sheet Probe 1992-1993

A. P.A.N. Environmental Services Corporation (PAN) was an SEC pink sheet company which Lead Plaintiff joined as Chief Operating Officer in 1993-94 as it sought financing for three existing operations in California and Minnesota. Defendant UNITED STATES, unbeknownst to Lead Plaintiff, was using PAN as a platform for a cross border investigation of financial frauds involving US persons and the Vancouver Stock Exchange, its brokers, agents, and others, and deliberately entangled the unwitting Lead Plaintiff into this international investigation which included defendants FBI and CIA, as well as RCMP, CSIS, and MI-6. Lead Plaintiff also made three trips to London to meet with Credit Lyonnaise Laing Managing

Director Michael Kurtanjenk (MI-6) regarding supposed PAN financing, returning from London Heathrow to Seattle, WA on Feb 8, 1994, and on March 11, 1994 according to CPB port of entry encounter records at LPEE page 540. A third return to La Guardia, New York is not recorded in CPB records during that 1994 time period.

B. This deliberate pattern of cross-border entanglements in national security and related investigations in 1993-94 repeats a pattern of practice defendant UNITED STATES had already used at Deloitte Seattle. Queen Elizabeth II's visit to the Seattle Westin in 1983 was a national security event which integrated MI-6 (Martin Astengo) into the Westin Hotel staff for a time. Defendant UNITED STATES has and does use this pattern of practice repeatedly since 1983. Defendants FBI and CIA in PAN in 1994 (paragraph 450-451), ESTABLISH 2007 (paragraph 464-466), and Senator Menendez foreign agent investigation and indictment between 2018-2023 (paragraph 525) which is the most recent example in this long-running sequence) to deliberately ensnare, ensnarl, and attempt to entrap Lead Plaintiff, perpetuate involuntary servitude, and sustain development of the defendant CIA and ARMY illegal BRMT bioweapon and bioweapon delivery system from 1968 to the present time.

C. CORNWELL, a former US Navy carrier pilot turned deep cover CIA agent who had worked espionage operations under commercial cover in north Africa before returning to the US, and who had deliberately and fraudulently failed to secure Alliance equity financing in 1992 through early 1993, now posed as having formed this new venture, PAN. PAN was allegedly using a publicly traded shell corporation (as recommended by Greg Harry, who was presented by CORNWELL as a public shell/PIPE expert during an office visit in Laguna Beach, CA) to work toward securing a form of financing known as a PIPE (private investment in public equity). PIPE financing allowed private funds to be invested in unregistered company shares

which after 90 days became publicly tradeable stock. These company shares would in turn be listed on NASDAQ to provide investor liquidity without the need to go through the SEC securities registration process.

D. CORNWELL also promised Lead Plaintiff PAN compensation and stock options as soon as a financing with Credit Lyonnaise Laing (CLL), a major French investment bank and stock broking firm with offices in London, was completed, so the Lead Plaintiff agreed to defer compensation for a time until the financing was completed. He had no knowledge that he remained the effective captive and involuntary servant of defendant UNITED STATES (CIA, ARMY, FBI, USMS), and its continuing BRMT, rights, and racketeering conspiracy.

E. The promised CLL financing, was actually simply another effort by defendants CIA and FBI to engage Lead Plaintiff in deliberate pattern of national security entanglements by cross-border projects involving CSIS (John Young, CSIS Vancouver mining financier/engineer commercial cover), and MI-6 (Michael Kurtanjek, CLL, international Managing Director for mining commercial cover used in MI-6 operations in Africa and elsewhere), MI-5 (UK's FBI equivalent), and the London Metropolitan Police. The London Metropolitan Police visible to Lead Plaintiff during his three PAN-related trips to London and CLL included a five man Counterterror squad trot-by while he was alone in a 500 foot long construction tunnel at Heathrow Airport, and a Copthorne Tara, Kensington, hotel bill on his hotel room number, which remained unpaid by CORNWELL for a sufficient time to attract the attention of their Serious Fraud squad. Lead Plaintiff made three trips to London to meet with Credit Lyonnaise Laing Managing Director Michael Kurtanjek (MI-6) regarding financing, returning from London Heathrow to Seattle, WA on Feb 8, 1994, and on March 11, 1994 according to CPB port of entry

encounter records at LPEE page 540. A third return to La Guardia, New York is not recorded in CPB records during that 1994 time period.

F. This deliberate pattern of cross-border entanglement in national security and related investigations again repeats, without limitation, the prior 1983 and 1994 patterns when it recurs in 2007. Lead Plaintiff was again trafficked by defendants FBI and ROSENBERG while employed after human trafficking from Seattle to Boston to Fort Lee, NJ and ESTABLISH, yet another FBI false flag employment cover company. While defendant ROSENBERG did not directly participate in the 1983 Queen Elizabeth II and 1994 PAN scenario he was present as an illegal FBI embed at NutraSource and connected with Lead Plaintiff, as BURNS (CIA) throughout that period of time. Through these careful and deliberate cross-border forms of national security entanglements by defendants CIA and FBI, Lead Plaintiff was rendered eligible for technical surveillance by CSIS, MI-5, and MI-6 during those periods of time, permitting those countries' intelligence surveillance personnel and tools to be used against the Lead Plaintiff and others in his direct contact network, even though such practices are not legal under US law for US police powers operations to use against their own citizens. This form of off the books trading of intelligence support facilitates illegal spying on US persons through fraudulent color of law abuse of international intelligence cooperation, which thereby functionally abuses and abridges the rights of US persons.

G. CORNWELL and defendant FBI also ran a \$165,000 fraudulent factoring theft on a Pacific Environmental Services (the P. in PAN) sub-soil remediation or paving project during this sequence in 1994, echoing the prior \$20,000 factoring loan which had been used for the fraudulent Canadian financing,\$65,000 loan default, and forced bankruptcy closed out just four or five months before. The California factoring company used in this specific fraud on Lead

Plaintiff was represented in a meeting in the greater vicinity of Orange County, CA, by an individual with a strong overall physical resemblance to Dave Brown (CNA), Henry Wozow (Pacific Financial Services), and Ron McCormick (Walmart- Bentonville), who appeared at various other times during this decades long associated-in-fact enterprise pattern of racketeering acts and rights violations. The practical effect of this specific factoring fraud was the continued deprivation of promised compensation by defendant UNITED STATES while at PAN.

H. Lead Plaintiff made numerous trips to supposed PAN operations in Ontario, California, met the London CLL contact, Michael Kurtanjek, in Los Angeles with CORNWELL, and took three trips to London and CLL over the next approximately six months, all in expectation of the completion of the promised financing of PAN by CLL, a major financial services firm with global reach and connections. Lead Plaintiff made three trips to London to meet with Credit Lyonnaise Laing Managing Director Michael Kurtanjek (MI-6) regarding financing, returning from London Heathrow to Seattle, WA on Feb 8, 1994, and on March 11, 1994 according to CPB port of entry encounter records at LPEE page 540. A third return to La Guardia, New York is not recorded in CPB records during that 1994 time period. Lead Plaintiff never received the compensation due for his work at PAN and was referred by ROSENBERG (FBI) during the latter stages of this FBI operation to Pacific Pipeline where he joined the Board of Directors in 1994 alongside ROSENBERG and PERILLO, among others.

I. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent,

to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 621 RGTS-1 subparagraph F is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	450-451, 464-466, 525
Appendix 2 paragraphs:	1-017
LPEE Table 2 pages 12023-12120 paragraphs:	2-0045 through 2-0061
LPEE pages (see technical note on page numbering at paragraph 230):	Not applicable
Emails and documents by topic and date, also located in LPEE:	Emails and documents are controlled by defendant UNITED STATES - as delivered to ROSENBERG (FBI) in 2007, and in USPS handled mail surveillance in 2008, 2010, possible recovery at Ramsey, NJ in 2018

624. RGTS-4 Rights Violations: Entrapment and Incrimination Attempts – FBI Sole Source, CFO Search, Tax Filings, Ironwood 2018-2023

A. As forensically reverse engineered, at the same time FBI opened a 2018-2023 national security investigation centered in Edgewater, NJ, FBI reached out to Lead Plaintiff as this investigation in January 2018 using a fraudulent financing from SOLE SOURCE as its bait to connect FBI SDNY directly to Lead Plaintiff. The investigation led to the September 22, 2023

indictment of NJ Senator Menendez for domestic corruption with a local real estate developer, bribery and influence peddling related to an Egyptian halal certification scheme, and actions as an unregistered foreign agent for Qatar.

B. Defendant UNITED STATES has and does sustain Lead Plaintiff's involuntary servitude and continue its entrapment attempts during 2018 to the present. Lead Plaintiff had sent a series of interstate email financing solicitations in late 2017 sourced from a list in a Los Angeles Times business news article, now known as a fraudulent planted story by defendant FBI on a spoofed Los Angeles Times website, seeking business financing. SOLE SOURCE Capital, Santa Monica, CA responded and introduced Dewey TURNER, a principal, from this fraudulent defendant FBI cover operation actually run from Manhattan, New York.

C. A few weeks later, TURNER and three other agents, one known as Bradford ROSSI, ostensibly visiting from Los Angeles, requested a meeting the afternoon of January 9, 2018 on very short notice at the St. Regis Hotel bar in New York City. ROSSI, as the senior most executive at SOLE SOURCE, verbally promised a multi-million dollar financing at that meeting. SOLE SOURCE, acting through emails and a January 23, 2018 phone call from Dewey TURNER, then reneged to the Lead Plaintiff's company Winnett Cattle Company (see paragraph 337). As dialog continued on other possible future investments occasionally into 2021, TURNER mentioned a visit to an operation in west Texas in one of his calls to Lead Plaintiff.

D. Searching for a CFO to support the company after a replacement financing, Lead Plaintiff came across CFO SEARCH in 2020, a specialized senior financial officer executive search firm with a "partner" who did or does work from a residential address in west Texas - Lubbock, Texas. The partner, known as Michael MAGGARD (FBI), located a CFO, Ibrahim

ABDELSAYED, an Egyptian national working in the United States, who was looking for a new position and had appropriate food industry experience.

E. The search for other financing was still underway in 2020. With alternate financing sources stalled (by defendant FBI technical hacks and intercepts of outward communications from Lead Plaintiff to viable and authentic private financing sources as it continued interference in interstate commerce), Lead Plaintiff advised MAGGARD of the delay in placing his identified CFO candidate Ibrahim ABDELSAYED as company CFO pending financing.

F. After some additional discussions, MAGGARD loaned \$6,000 (actually FBI funds) to Lead Plaintiff's company Gannett Peak Ranch (GPR) for web development, and another \$6,000 to Lead Plaintiff personally which was used to try to improve his credit score by lowering credit utilization and payment defaults, so Lead Plaintiff would be able to co-sign for a six figure loan for Gannett Peak Ranch. As previously experienced, this good faith interstate commerce Gannett Peak Ranch project also went wrong - the web site was never completed by ENVOTEC (almost completed, saying they just needed a little more time and money, yet again as with other prior software projects). Nonetheless, the \$6,000 personal loan was still due from Lead Plaintiff to MAGGARD, the \$6,000 business loan was still due, and there was no offsetting revenue or income.

G. Defendant UNITED STATES (FBI) then cooked up a new entrapment scheme to get this \$6,000 loan off defendant FBI records. A release form for a Whistler, British Columbia, Canada condo (Ironwood, LPEEV65-9) already released by Lead Plaintiff to second spouse Jeanette (and not shown on either the condo association records nor the British Columbia, Canada property roll) in their 2005 divorce, mysteriously showed up beginning in February 2023

in the approximate amount of \$6,000 a nearly perfect offset for the \$6,000 MAGGARD personal loan (if defaulted) for tax purposes.

H. The disclosure requesting the release stated there were no underlying records which support this timeshare on either the condo association or the British Columbia timeshare interest register as required by law (paragraph 648 RICO-10, LPEEV65-9). While a British Columbia notary firm was used to complete the release of interest process, this was a transparent attempt to either (i) secure a loan default against FBI agency funds by FBI, to entrap the Lead Plaintiff, and/or (ii) to create a condition for loss of government benefits by alternate means (federal Section 8 housing choice voucher, paragraph 301, 481, 514-515, 646B, C, 647B, C RICO-8, 9) and (iii) to transfer responsibility for this transparently illegal act against a US person off defendant FBI's records, using classic "blame the victim" tactics seen often in criminal assaults, as recounted throughout this Complaint.

I. Forensic reverse engineering provides the following common pattern racketeering acts by defendant UNITED STATES (FBI) and its co-conspirators in this sequence as previously experienced by Lead Plaintiff which have no valid original legal basis for their initiation by defendant UNITED STATES:

- (i) Fraudulent pretexting lacking legal basis repeated
- (ii) National security entanglements repeated
- (iii) Human trafficking repeated
- (iv) Interstate commerce interference entrapment repeated – fraudulent financings, fraudulent employees, incomplete and defective technology projects
- (v) Interstate commerce interference incorporating a personal liability entrapment repeated

(vi) Successor fraudulent concealment acts repeated

J. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 621 RGTS-1 subparagraph F is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	301, 337, 481, 514-515; RICO-10, 646B, C, 647B, C 648 RICO-8, 9, 10
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	Not applicable
LPEE pages (see technical note on page numbering at paragraph 230):	LPEEV65-8, 9
Emails and documents by topic and date, also located in LPEE:	Certain emails are blocked by a defendant UNITED STATES computer hack

625. *RGTS-5 Rights Violations: Bad Faith Acts – Illegal Searches, BRMT Hijacking, and Harassing, Oregon Trip 2021*

A. Lead Plaintiff's flight from Kennedy Airport in New York City to Seattle, WA, enroute to Redmond OR, for the Lake County Ranch tour listed at paragraph 693 RICO-55, in July 2021 was delayed for about two hours due to a local thunderstorm over Kennedy Airport. The flight arrived in Seattle about 1:00 AM local time, about 20 hours after the Lead Plaintiff awakened the previous morning in New Jersey, and hours after the last evening flight connection to Redmond, OR. Lead Plaintiff remained overnight in Seattle, where he got about four hours of sleep. Defendants attempted to take advantage of this much shortened night of sleep to cause the Lead Plaintiff to act out against an undercover officer the next morning.

B. About an hour before his early morning flight, he stopped at a concourse restaurant for breakfast. After a few minutes, an undercover police powers officer abruptly replaced the food service worker shortly after he ordered breakfast, then delayed providing the check for the meal for about 15 minutes while he conversed with a 6 to 8 person undercover police backup team which had arrived and was seated a couple of tables away. Needing to catch the departing flight, Lead Plaintiff called to this server several times for the food service check, the server repeatedly acknowledged and delayed, so the Lead Plaintiff who rarely carries cash, dropped a \$20 bill on the table and began to leave. Seeing that his bluff has been called and with the establishment allegedly not accepting cash (it is illegal not to accept cash as payment in Washington state), the server rushed to the table and an illegal BRMT bioweapon and bioweapon hijacked moment of anger (BRMT adrenaline boost) on short sleep ensued as the server insisted a credit card must be used. No violence occurred as Lead Plaintiff had by now learned substantially more about the biochemically driven emotional body sensations exhibited

in illegal BRMT brain hijacking, and carefully kept his arms rigid at his sides so his movements could not be misinterpreted by the police snatch team seated nearby as any assaultive move, and simply raised his voice, so the nearby police snatch team would be aware of their operational failure.

C. This was a typical illegal BRMT-enhanced entrapment sequence run by defendant UNITED STATES hundreds of times against Lead Plaintiff (including many dangerous scenarios which were not reverse engineered until 2021 and thereafter), using the natural circumstances of events as they unfold to involve local police powers, who would have no reason to be aware of this classified illegal BRMT bioweapon and bioweapon delivery system's existence and these malign methods of surreptitious operation.

D. Since the illegal BRMT bioweapon and bioweapon delivery system has been a very highly classified federal program of defendant UNITED STATES, it can be used very successfully in corrupt federal police powers and intelligence agency entrapment attempts. If an unpaid food service check walk-off or an assault on the undercover officer (food server) had occurred, local police would have arrested, processed, and prosecuted this incident as an unprovoked assault on a police officer or as a walk-off theft, though it was actually perpetrated as an entrapment crime targeting the Lead Plaintiff perpetrated by defendant UNITED STATES (defendant CIA domestic field personnel) using the illegal BRMT bioweapon and bioweapon delivery system, its brain hijacking system, to effect the imprisonment of the Lead Plaintiff through this third party local or other federal police powers operation.

E. This conduct is completely consistent with prior and subsequent behaviors of defendant UNITED STATES and its co-conspirator defendant police powers entities, officers, and agents, as expressed through their conduct, including conspiratorial conduct cited in

paragraphs 600-603 NSEC-1-4; 615-618, 620 HEXP-12, 13, 14, 17; 624-626, 628-632, 635, 636 RGTS-4, 5, 6, 8-12, 15, 16; 638-693 RICO-1-55, 694-710 LETHL-1-17. See also these types of harassment, entrapment, and incrimination attempts at LPEE page 181H paragraph 138. These incidents are a very small set of select of examples of these incidents which have been and are run against Lead Plaintiff. Hundreds of other such incidents will unquestionably be unveiled through the discovery process, including in Lead Plaintiff's own hand-written notes, and in computer files most probably still in the hands of FBI, as computerized files dating back into the early 2000s were handed to ROSENBERG in late 2007.

F. Since members of the general public also engage in these harassing and annoying behaviors in the vicinity of the Lead Plaintiff at times due to his extreme public visibility, it can be difficult at times to distinguish the purposeful harassment by defendant police powers personnel acting illegally under color of law from lawful exercises of civil rights and nonviolent free expression by members of the public. This particular scenario on a Sea-Tac Airport concourse before flying to Redmond, Oregon was, to the now well-experienced Lead Plaintiff, a clearly obvious police powers operation. The risk of BRMT induced escalation in his hijacked brain at these kind of moments leads Lead Plaintiff to exercise extreme caution around others in these scenarios to avoid any undue provocations and encounters which could lead to escalation and use of force by police powers personnel or others. But the same cannot be said for other unwitting persons targeted and victimized by these corrupt police powers operations against them, who are doubtless among the other members of this class of victimized plaintiffs.

G. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude

over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 621 RGTS-1 subparagraph F is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	600-603 NSEC-1-4; 615-618, 620 HEXP-12, 13, 14, 17; 624-626, 628-632, 635, 636 RGTS-4, 5, 6, 8-12, 15, 16; 638-693 RICO-1-55, 694-710 LETHL-1-17
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	Not applicable
LPEE pages (see technical note on page numbering at paragraph 230):	181H paragraph 138
Emails and documents by topic and date, also located in LPEE:	Bryant Park Jazz and 911 call bemused response 220701, COSTCO GC reply to verification request 211102, Match Group Second Notice re Preserve Evidence 220122, Match EPL Response 221110, Match Group Legal Dept Email 221110, NYPD FOIL righttoknow Summary 210901, NYPD FOIL Appeal Denial Letter 210915, NYC Mayor Ofc Assist Re NYPD FOIL Appeal Denial 211001,

	NYC Mayor Ofc Assit Request NYPD FOIL Appeal Denial 211001, NYPD FOIL Request 210901, NYPD Response to FOIL Request 210903, NYPD Notice of Duty to Preserve Evidence 211116, NYPD Reply to Evidence Retention Letter 211123, NYPD Reply to Corbett Evidence Preservation 211127, NYPD Event Sequence 220422, Certain emails are blocked by a defendant UNITED STATES computer hack
--	---

626. RGTS-6 Rights Violations: Bad Faith Acts – Federal Police Powers Abuses of Legal Processes 1990 to present

A. As forensically reverse engineered, defendant UNITED STATES and its defendant co-conspirators have and do engage in bad faith acts in their systemic abuses of the legal system and legal process. Defendant UNITED STATES has and does use a variety of legally abusive practices to (i) engage in broad ranging general searches, to (ii) harm and wreck the political and commercial interests of US persons, and to (iii) conceal those illegal acts behind normal practices of records destruction, which are used with human trafficking and other direct methods to conceal and destroy evidence of their crimes and criminal intent, and of those committed by co-conspirators. Illegally embedded and misrepresented or ethically and legal compromised corporate lawyers have and do act against client interests while apparently engaged for their benefit in direct violation of (a) legal standards of conduct, and their (b) fiduciary duty to clients as specialists in the field of law in both common law frauds against interests through the color of law abuse of the legal process (violations of 18 USC 1589(a)(3) related to forced labor) and (c) constructive frauds against client interests and in violations of their ethical duty to clients under state and federal bar codes of ethics for conduct as officers of the court. Federal police powers defendants both act to enable these practices and fail to act to suppress and disable these illegal patterns of practice. These abusive practices, as experienced directly by the Lead Plaintiff

against his own interests and against the interests of others of this class of injured plaintiffs, include:

- i. Imposed litigation expenses required to remedy illegal acts undertaken in cover operations by or on behalf of federal defendants against US persons, including, without limitation, thefts of compensation, check fraud, wire fraud, receivables fraud persons. (Direct examples of this pattern of practice include, without limitation, frauds against Alliance, and Allegent, LLC dba Performa cited herein, paragraphs 275, 276, 303, 462.)
- ii. Imposed compromises of financial and other assets required to remedy illegal acts undertaken in cover operations by or on behalf of federal defendants against US persons, including, without limitation, thefts of compensation, check fraud, wire fraud, receivables fraud. (Direct examples of this pattern of practice include direct frauds against Alliance (paragraph 650 RICO-12, and against Lead Plaintiff by CNA cited herein (paragraphs 457-461, 600 NSEC-1, 602 NSEC-3, 639-641 RICO-1-3).
- iii. Non-working attorneys embedded in law firms who make vague claims to represent client interests but who do no direct work for those clients (government targets) to evade attorney-client privilege ethical and legal constraints, and thereby conduct de facto general searches. (Direct examples of this pattern of practice include embedded attorneys HIBBS and GARRISON cited herein, paragraphs 446, 441.)
- iv. Corporate lawyers who misrepresent client interests to benefit the government, while operating in illegally embedded undercover roles in law firms. Lead Plaintiff was not consulted prior to the removal of a cost-plus provision at paragraph 12 of the Alliance purchase and sale agreement for the asset purchase of Steve's Maintenance, including the assumption of project contracts for projects then currently underway but incomplete. The

Short Cressman Burgess attorney did not mention the removal of the cost-plus reimbursement paragraph 12 to Lead Plaintiff. Only his direct review and insistence on its return to the agreement resulted in the final agreement which included this paragraph 12. If the purposeful deletion by Susan THORBROGGER (Short Cressman Burgess, Seattle, WA, most probably DOJ, together with HIBBS) had not been noticed and returned on Lead Plaintiff's insistence, this deletion would have potentially cost Alliance up to \$165,000 of lost revenue and approximately \$100,000 of unreimbursed costs for labor, materials, asbestos waste dump fees, and direct project overhead costs, on the Bates Vocational-Technical parking garage asbestos abatement project which required hand jack-hammering and removal of an asbestos paper interposed between the concrete finish floor and the underlying structural floor in the multi-story parking structure at Bates in Summer 1990. A \$265,000 loss would have wiped out company equity (initially \$250,000) and left the Lead Plaintiff in personal default on a \$150,000 bank line of credit related to his personal guarantee with excellent personal credit. Nonetheless, defendant FBI would go on to complete the wrecking of the illegal search cover company, Steve's Maintenance, which destroyed its business records and thereby fraudulently concealed criminal wrongdoing in criminal investigations. This process destroyed Lead Plaintiff's company Alliance in 1993 through the use of, without limitation, as forensically reverse engineered, as part of defendant UNITED STATES' intentional financial wrecking of Lead Plaintiff's company Alliance, which incorporated (i) fraudulent co-ownership and control through a nominee (David J. Carey as nominee, FBI, paragraphs 445-449, 649 RICO-11), (ii) fraudulent legal representation (HIBBS and Susan THORBROGGER, DOJ/FBI, both embedded at Short Cressman Burgess law firm, paragraphs 446; 626

RGTS-6, 649, 651, 653, 683 RICO-11, 13, 15, 45), (iii) fraudulent deprivation of government benefits (SBA bonding, paragraph 446, 471; 649, 653 RICO-11, 15), (iv) theft and compromise of receivables (Steve and Kerry Brewer, FBI, paragraphs 644, 650, 651 RICO-6, 12, 13), was then succeeded by (v) a Vancouver, B.C. fraudulent financing which failed (paragraph 653 RICO-15).

- v. Corporate lawyer abuses using embedded and solo practice attorneys who represent corporate entities but not individuals and use this distinction to conduct intelligence operations, general searches, and conceal illegal operations of defendant DOJ and its police powers agencies, as conducted against individuals, their rights, and interests. (Direct examples of this pattern of practice include HIBBS, GARRISON, LARSON, CALDWELL, SULLIVAN cited herein, paragraphs 446, 441, 602U(xxvi), 621D, 99e, 171.)
- vi. Subpoena process abuses used to extract otherwise inaccessible information by engaging in litigation directly against the target and/or indirectly by faux litigation between two cover entities. (Direct examples of this pattern of practice include *CORNHUSKER Capital v. Auctus* cited herein, paragraph 671 RICO-33.)
- vii. Entity embeds of undercover officers and/or agents as employees of an entity who target that entity and/or customer operations and/or finances for disruption, to empower internal dissension, and/or to sabotage direction and operations. (Direct examples of this pattern of practice include PCC – Whiteman (WEISSMAN); Pacific Pipeline - PERILLO et al; Nutra Source – LeFevre (ROSENBERG) et al; Alliance – Hintz, Kealoha, Steele (BIVENS) et al; ESTABLISH – Drumm (ROSENBERG) et al cited herein.)

- viii. Corporate and other legal form cover entities used to sustain captive employees in involuntary servitude in entities which have employed Lead Plaintiff and were and/or are cover entities, and together with various mail and electronic frauds, sustain this involuntary servitude and forced labor, and enable captive human biomedical experimentation without informed consent. (Direct examples of this pattern of practice include Deloitte Seattle (Consulting) – Hopper et al; LazerSoft – Moller (STONE) et al; PCC-Whiteman (WEISSMAN); NutraSource – LeFevre (ROSENBERG); P. A. N. – CORNWELL et al; Pacific Pipeline-PERILLO; CNA Industrial Engineering – COOK et al; ESTABLISH – Drumm (ROSENBERG) et al cited herein.
- ix. Corporate and other legal form cover entities used to sustain captive “owners” including, without limitation, entities which have employed Lead Plaintiff as an “owner” which were and/or are cover entities used, together with various mail and electronic frauds, to sustain involuntary servitude and forced labor, and human biomedical experimentation without consent. (Direct examples of this pattern of practice include, without limitation, Alliance, Allegent, LLC dba Performa, Winnett, Winnett Cattle, Gannett Peak Ranch – all with co-investment by federal defendants, generally FBI and/or CIA cited herein, paragraphs 445, 516,565, Interline Exhibit 6.)
- x. General searches, which are broad ranging inquiries against specific groups or individuals rather than against suspicion of specific acts and patterns of conduct are specifically unconstitutional, and directly violate the Founder’s intent, wherein legalistic maneuvers are used to claim them as intelligence operations, and which may embed undercover personnel and informants, and bleed appropriated funds into ostensibly private cover entities and into favored collaborating private entities to sustain financial

losses while competing with private sector firms for certain types of contracts and sales.

Used to conduct commercial and other general searches (under the sweeping title of “intelligence operations”) of all forms of persons, private entities, including civic, political, cultural, artistic, and religious groups, cooperatives, and other officially disfavored institutions and individuals. (Direct examples of this pattern of practice include all elements of Lead Plaintiff’s human existence both domestic and international; Deloitte Seattle (Consulting) as to various domestic undercover investigations and international commercial cover spying projects; NutraSource as to food buying clubs and cooperatives; Pacific Pipeline as to authors, publishers, and retail booksellers; CNA as to the “Japanese Miracle” and national security matters cited herein, paragraph 600 NSEC-1.)

- xi. Foreign intelligence and national security entanglements claimed as intelligence operations which abuse relationships with foreign intelligence and formulate and /or promote officially propagated lies for the purpose of abusing US persons by orchestrating both in-country and international spying on those persons by foreign intelligence operations, who then share this information legally acquired under their own laws with US police powers and intelligence operations. Used to conduct otherwise illegal general searches (under the sweeping titles of “intelligence operations” and “national security”) of all forms of persons, private entities, including civic, political, cultural, artistic, and religious groups, cooperatives, and other officially disfavored institutions and individuals.
- xii. Attorney-client privilege inadvertently waived by having individuals unrelated by marriage, and individuals not represented with corporate and other legal form interests

engage legal counsel on an issue in which both the individual(s) and/or the entity and the individual do not share a common and direct legal interest.

B. All subcounts throughout this Complaint relate directly and explicitly to these patterns of practice which are driven by defendants' conspiracy to commit and comprise an integrated pattern of illegal acts including racketeering acts, which both individually and as a pattern of practice, would reasonably be expected to engage the interest of elements of defendant DOJ, rather than no element of defendant DOJ in its sworn constitutional duty to protect the public interest, including the liberty and constitutional rights interests of all US persons.

C. One example of this durable pattern of corrupt practice inculcates defendant Leslie CALDWELL, who conspired to and supported the illegal BRMT bioweapon and bioweapon delivery system and the accompanying rights and associated-in-fact enterprise pattern of racketeering acts from the 1970s throughout her public employment at defendant DOJ. Defendant CALDWELL has been plausibly identified as the roommate of Susan B. Irish at WSU, who was Lead Plaintiff's assigned romantic partner for nearly two years. Defendant CALDWELL expressed anger one morning after his overnight stay in the bedroom she shared with Irish, for observation by Irish for possible sunstroke (more plausibly an illegal BRMT human subject biomedical experiment without consent which caused and created this specific set of symptoms under the program management of defendant BREYER and with the participation at WSU of GARLAND, now Attorney General). CALDWELL apologized a few days later to Lead Plaintiff, explaining that Irish had informed of the reason for the overnight in the bedroom shared by Irish and Caldwell.

D. Defendant CALDWELL worked with defendant WEISSMAN as an Assistant US Attorney in the Eastern District of New York from 1987-1998, after defendant WEISSMAN left

his illegal embedded position at PCC where Lead Plaintiff had served on the Boards of both PCC run by defendant WEISSMAN, and NutraSource formed by WEISSMAN using PCC financial resources and run by illegally embedded defendant ROSENBERG as CEO. Defendant CALDWELL transferred to the Northern District of California where she worked for US Attorney Robert MUELLER (who was later FBI Director from 2001-2013) and for his successor from 1999 to 2002. Defendant CALDWELL rejoined defendant WEISSMAN on the Enron Task Force between 2002 and 2005. During this period, defendant CALDWELL fraudulently misrepresented herself as a Seed & Berry intellectual property attorney in Allegent LLC's 2004 ShipNow check fraud intellectual property claim brought by the Lead Plaintiff, wherein she acted outside the plausible role and any plausible expectation of the role of a prosecutor (as defined at 28 U.S.C. § 547) in a conspiracy to fraudulently conceal defendant FBI's illegal associated-in-fact enterprise pattern of racketeering acts, which included this ShipNow bad check fraud on Allegent, LLC and co-owner Lead Plaintiff, which racketeering acts were then being run by defendants ROSENBERG and PRAY (who was posing as Allegent, LLC's co-owner) during the 2002-2005 financial, marital, and emotional wrecking of Lead Plaintiff through a period of divorce, business destruction, income destruction, torture, suicide ideation, loss of property, homelessness, and destruction of evidence conspiracy of defendants ROSENBERG and PRAY in conspiracy with defendant FAUCI (including Lead Plaintiff's compensation litigation against CNA for compensation theft, paragraph 641 RICO-3).

E. Between 2014 and 2017 CALDWELL was promoted to Assistant Attorney General Criminal Division under Attorney General HOLDER, as about \$14,000 was stolen from Lead Plaintiff by defendant CIA using the pseudonym Laura Akoto in his on-going involuntary servitude and illegal BRMT bioweapon and bioweapon delivery system hijacking and oxytocin

manipulations (paragraph 637 RGTS-17) while he resided in Ramsey, NJ, before he was human trafficked to Edgewater, NJ including, without limitation, an accelerated cycle of lethality attempts (paragraphs 703-710 LETHL-10-17, Interline Exhibit 15), another salacious video session and fraudulent relationship (paragraph 613 HEXP-10) in the middle of the Senator Menendez public corruption investigation which was indicted on September 22, 2023.

F. Comparable conflicts between the interests of justice and the personal interests of defendant WEISSMAN arose in the 1960s or 1970s when he was embedded by defendant FBI in Associated Grocers, where he supervised the infiltration team at Larry's Market, co-owned by Lead Plaintiff's father cousin, Larry Brewer and secretly co-owned and financially destroyed by defendant FBI, WEISSMAN, paragraph 99j, 99k, 418, 449.

G. Defendant WEISSMAN then moved from Associated Grocers, the Seattle, WA based regional independent supermarket cooperative wholesaler, to a new illegal embedded position as PCC General Manager in the early 1980s. Defendant BREYER rotated out of the illegal BRMT bioweapon and bioweapon delivery system program management role. BREYER was replaced at some point during the early 1980s by defendant BURNS (CIA), whose first known direct personal interaction with Lead Plaintiff was in Summer 1986, paragraphs 36 table, 48(b), 120, 437-444.

H. Defendant WEISSMAN arranged defendant ROSENBERG's transfer to the defendant FBI Seattle field office in the early 1980s to operate as the illegally embedded CEO of newly formed NutraSource, where the unwitting Lead Plaintiff served as a member of the Board of Directors representing PCC, and where defendant WEISSMAN was himself illegally embedded with other defendant FBI personnel from the Oakland, CA food cooperative in secret control of the NutraSource Board of Directors, so the illegal regional defendant FBI spying mission could

be expanded to all organic and natural food retailers and food buying clubs in the Pacific Northwest and Alaska using NutraSource as the platform for this illegal spying and targeted financial wrecking operations.

I. Defendant WEISSMAN later transferred out of defendant FBI to become an Assistant U.S. Attorney for the Eastern District of New York in 1991-2002, ran the Enron Task Force prosecutions from 2002-2005 with CALDWELL and others, then was FBI General Counsel to FBI Director MUELLER from 2011-2013 before moving back to defendant DOJ to be Chief of the Criminal Fraud Section at defendant DOJ headquarters from 2015-2017, working there for CALDWELL, then Assistant Attorney General for the Criminal Division, also at defendant DOJ's headquarters.

J. Comparable conflicts between the interests of justice and the personal interests of defendant ROSENBERG, the former illegal embedded CEO of NutraSource, the PCC investment with Lead Plaintiff on its Board, after NutraSource was merged with an Auburn, CA wholesaler. In 2005-2006, Attorney General GONZALES appointed defendant ROSENBERG Acting US Attorney for South Texas in June 2005-2006 to move him away from the on-going conspiracy with defendant FAUCI divorce/business wrecking/torture sequence described at paragraph 510-520, 610 HEXP-7, immediately after the May 2005 forced sale of Lead Plaintiff's 149th Street, Kirkland, WA home (Interline Exhibit 14) was completed and that particular FAUCI, ROSENBERG, FBI, CIA, ARMY, DOJ, RUBIN, MELBER, VINDMAN, PRAY, and unknown other defendants, total wrecking sequence was nearing completion.

K. Attorney General GONZALES then arranged Rosenberg's confirmation as US Attorney for Eastern Virginia from 2006 to 2008, wherein Lead Plaintiff was again being human trafficked directly under defendant ROSENBERG's supervision from homelessness in Boston,

MA (paragraphs 213, 223, 225A, 276A, 416, 464-466, 603 NSEC-4) to Fort Lee, NJ. In fact, defendant ROSENBERG had been human trafficking the unwitting Lead Plaintiff since the early 1980s, paragraphs 600-604 NSEC-1-4, previously with CORNWELL, PERILLO, and others, this time in conspiracy with defendant FAUCI. Through a bogus Mossad interview in Boston which was intended to develop a completely fictional terror legend for Lead Plaintiff (confirmed by defendant NYPD before a local and federal coordinated police powers cover-up, Interline Exhibit 17-19), then during his direct employment at ESTABLISH in Fort Lee, NJ, where defendant ROSENBERG was General Manager in 2007 through early 2008.

L. Defendant ROSENBERG then burnished the fraudulent and defamatory legend he had spun about the Lead Plaintiff into further depravity with defendants MODDERMAN, NYPD, PAPD, NJTPD, BERGEN SHERIFF, NJSP, CIA and other unknown defendants (paragraphs 464-466, 603 NSEC-4, 606, 611-616, 618 HEXP-3, 8-13, 15). Defendant ROSENBERG later served again in defendant FBI under Director Comey as Chief of Staff from 2013-2015, and then was designated as Acting Administrator of DEA from 2014 to 2017. The conflicts of interest with the alleged justice mission of defendant DOJ dated from the early 1980s and there was no personal interest for defendant ROSENBERG or for defendant FBI in anything other than an adverse outcome to Lead Plaintiff.

K. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and

racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953).

Paragraph 621 RGTS-1 subparagraph F is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4-12,16-19
Complaint paragraphs:	99e, 99j, 99k, 36 table, 48(b), 120, 171, 213, 223, 225A, 275, 276, 303, 416, 418, 437-449, 457-462, 464-466, 471, 516, 565, 510-520, 600-604 NSEC-1-4; 606, 610-616, 618 HEXP-3, 7-13, 15; 621D, 626, 637 RGTS-1, 6, 17; 639-641 644, 649-651, 653, 671, 683 RICO-1-3, 6, 11-13, 15, 33, 45; 703-710 LETHL-10-17
Appendix 2 paragraphs:	Entirety
LPEE Table 2 pages 12023-12120 paragraphs:	Entirety
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 368-794, 797-865, 934-1075, 11630-11936
Emails and documents by topic and date, also located in LPEE:	LIBERTY EB-5 Contract Annotated 141112.pdf LIBERTY EB-5 LOI .pdf LIBERTY EB-5 LOI 141112.pdf LIBERTY EB-5 LOI WinnettOrganics LOI 11-5-14.pdf WO (CO) Articles of Incorporation 150702.pdf WP (CO) Articles of Incorporation 121022.pdf WP IRS Employer ID Number FEIN 120824.pdf Stock Cert 003 D Merck 121202.pdf WP WO Los Angeles Management Meeting Agenda 150924.pdf 150805 WP Stock Cert 002 Preferred Series A Dean Smith 150805.pdf 150917 WP Stock Cert 003 D Brewer 150917.pdf

	<p>150921 WP Stock Cert 016 Common BELLI Architectural Group 190521.pdf</p> <p>150921 WP Stock Cert 017 Common SULLIVAN 190521.pdf</p> <p>150927 WP Stock Cert 004 Preferred Series A Doug PETERSEN 150927.pdf</p> <p>150927 WP Stock Cert 005 Preferred Series A Dean Smith 150927.pdf</p> <p>150929 WP Winnett Perico Shares Auth Attach150929.pdf</p> <p>160320 WP Stock Cert 006 Preferred Series A Dean Smith 160320.pdf</p> <p>160404 WP Stock Cert 007 Preferred Series A Doug PETERSEN 160404.pdf</p> <p>161024 WP Stock Cert 008 Preferred Series A Dean Smith 161024.pdf</p> <p>161028 WO Cattle Co Annual Report 161028.pdf</p> <p>170103 WP Stock Cert 009 Preferred Series A Doug PETERSEN 170103.pdf</p> <p>170420 WP Stock Cert 010 Preferred Series A Doug PETERSEN 170420.pdf</p> <p>170519 WP Stock Cert 011 Preferred Series A Doug PETERSEN 170519.pdf</p> <p>170708 WP Stock Cert 012 Preferred Series A Doug PETERSEN 170708.pdf</p> <p>170911 WP Stock Cert 013 Common D Brewer 170911.pdf</p> <p>170914 WP Stock Cert 014 Preferred Series A Doug PETERSEN 170914.pdf</p> <p>170923 WP CO SOS Annual Report 170923.pdf</p> <p>180305 WP Stock Cert 015 Preferred Series A Doug PETERSEN 180305.pdf</p> <p>190628 WP Shares Distribution 190628.pdf</p> <p>SBI AP Aging Detail Report 2020 12-31 draft v1 201231.pdf</p> <p>SBI Articles of Incorporation NJ 200123.pdf</p> <p>SBI Balance Sheet 2020 12-31 draft v1 201231.pdf</p> <p>SBI Case Ready Plant 17 Plant Operations Workflow Design Rev 1.7 200707.pdf</p> <p>SBI Completed App NJ-REG 200123.pdf</p> <p>SBI Debt Schedule Digitally Signed Document Not Converted 210703.pdf</p> <p>SBI EIN CP 575 A Notice 200123.pdf</p> <p>SBI Income Statement 2020 12-31 draft v1 SBI.pdf</p> <p>SBI Shares Distn 200124.pdf</p> <p>SBI Shares Distn 200225.pdf</p> <p>SBI Sheldon Beef Tax Return 2020 12-31 Draft v1 201231.pdf</p>
--	--

	200123 SBI Completed NJ-REG 200123.pdf 200123 SBI EIN 84-4406368 CP 575 A Notice 200123.pdf 200123SBI Articles of Incorporation NJ 200123.pdf 200225 SBI 001 Brewer Stock Cert Common 200225.pdf 200225 SBI 002 WASEMAN Stock Cert Common 200225.pdf 200225 SBI 003 NICKLESS Stock Cert Common 200225.pdf 200225 SBI 004 SULLIVAN Stock Cert Common 200225.pdf 200225 SBI 005 Canchola Stock Cert Common 200225.pdf 200225 SBI 006 PETERSEN Stock Cert Common 200225.pdf 200225 SBI 007 BELLI Stock Cert Common 200225.pdf 200225 SBI 2020 Stock Opt Plan approved by BD on 200225.pdf 200225 SBI Canchola SB Grant - Signed 200225.pdf 200225 SBI Canchola SBI Notice of Stock Option Grant 200225.pdf 200225 SBI NICKLESS SBI Notice of Stock Option Grant 200225.pdf 200225 SBI NICKLESS Stock Option Grant 200225.pdf 200225 SBI WASEMAN SBI Notice of Stock Option Grant 200225.pdf 200324 SBI Shares Distribution 200324.pdf Certain emails are blocked by a defendant UNITED STATES computer hack
--	---

627. RGTS-7 Rights Violations: Bad Faith Acts – Federal Police Powers Abuses of Legal Processes Forced Personal Bankruptcy 1993

A. CORNWELL (former commercial cover CIA agent in north Africa selling center pivot irrigation systems as cover) and defendant FBI worked, unknown to Lead Plaintiff, with RCMP, Ralph Shearing (who ostensibly ran a Canadian mining geophysical sampling company based in Vancouver, BC, Canada), and Rory Godinho (barrister in the Vancouver, BC area), and CSIS, John Young (international mining financier and mining engineer), to develop a fraudulent Vancouver, BC financing package through Shearing, which required a financial audit. A \$20,000 factoring loan from Pacific Financial Services, Bellevue, WA (a fraudulent factoring

company run by Henry Wozow, most probably FBI) was used to cover the financing fees, audit fees, and expenses (paragraphs 447-448).

B. When this fraudulent financing eventually failed in Vancouver, BC, Canada, the \$20,000 factoring loan turned in a few months into a loan default totaling \$65,000 which Lead Plaintiff had personally guaranteed, and then into personal federal bankruptcy in December 1993 for Lead Plaintiff and his second wife Jeanette. Lead Plaintiff was working on a financing at PAN when his wife Jeanette, who worked in the same First American Title Company office in Bellevue, WA as Laurie Vanderberry (wife of Kerry Vanderberry, FBI Seattle bank robbery squad agent, whose infant son Lead Plaintiff and Jeanette babysat at their home in Kirkland, WA, paragraph 104) informed him that the Pacific Financial Services default court order against community property was being used to garnish her wages for this \$65,000 defaulted loan.

C. During a conversation with the Bellevue, WA bankruptcy attorney in Fall 1993, Jeanette proposed that the 149th Street, Kirkland, WA house be forfeited in the bankruptcy. (Federal Bankruptcy Court case filed November 1993). This made no financial sense as the equity in the residence did not exceed and was protected by the bankruptcy exemption for minimal assets. She persisted for some time as Lead Plaintiff demurred and Jeanette eventually relented. Lead Plaintiff proceeded later to complete the improvements to the 149th Street residence at Interline Exhibit 14.

D. With the benefit of forensic reverse engineering, it is plausible Jeanette understood the circumstances but was fearful of revealing the true nature of the contrived marital relationship and the hostile local environment, including defendant BURNS. The defendant BURNS (CIA) residence was across the street. Jeanette's supposed extended family members included sister-in-law Michelle (RUBIN, FBI), stepbrother Paul (Alexander VINDMAN, ARMY), and stepbrother

by marriage Wes (Ari MELBER, FBI). Based upon some oblique comments Jeanette made, which were misunderstood then by Lead Plaintiff, it is highly probable ARMY was then deferring criminal prosecution for national security matters based upon her sexual orientation and deliberate inculcation in national security matters to force the relationship with Lead Plaintiff.

E. Non-heterosexual military service in the 1980s and 1990s was a prosecutable military criminal justice system offense, which would have been compounded by the deliberate inculcation of Jeanette into national security matters. Wife Jeanette may then have been attempting to remove herself from the BURNS/ARMY problem, or at least the physical proximity to BURNS (across 149th Street, Kirkland, WA) through a physical relocation.

F. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 621 RGTS-1 subparagraph F is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See

other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	104, 447-448
Appendix 2 paragraphs:	1-017
LPEE Table 2 pages 12023-12120 paragraphs:	2-054 through 2-056
LPEE pages (see technical note on page numbering at paragraph 230):	Not applicable
Emails and documents by topic and date, also located in LPEE:	Federal Bankruptcy Court case filed November 1989

628. *RGTS-8 Rights Violations: Bad Faith Acts – Willful Blindness, US Attorney Offices, DOJ Headquarters 2005 to present*

A. Lead Plaintiff shared information about all the then known acts, violations, and injuries from about 2002 to 2005 with the U.S. Attorney’s Office for the Western Washington in Summer 2005. This description was far short of an accurate portrayal of the facts and circumstances even to that date, as Lead Plaintiff was completely ignorant of all, but the most obvious elements, of the coercive psychological operations undertaken during that specific period. He was met with the events of duress and homelessness described at paragraphs 320, 462-463, 518. The U.S. Attorney’s Office for the District of Columbia received a courtesy filing in September 2021 of DC 1:21-cv-2424 by personal hand delivery (and a laughable DC Fire Department Hazmat Team sluggish emergency response was witnessed immediately as the Hazmat Team enroute toward the DC US Attorney Civil section office immediately thereafter rolled by the National Building Museum and the Lead Plaintiff). The only reply was an email from the office indicating that the filing was not served (full text at LPEEV65-10):

dsbrewer [REDACTED]

From: [REDACTED]@usdoj.gov>
Sent: Tuesday, October 12, 2021 3:34 PM
To: Dennis Brewer
Subject: RE: DC District EMERGENCY REQUEST for Injunctive Relief and Complaint

Dennis,

I have received your email. However, please allow me to reiterate what we discussed when you called earlier that this is not a substitute for service and we cannot accept service via email. Our office will need to be served in accordance with the Civil Rules of Civil Procedure. If you have questions, you should contact the civil clerk for the District Court of the District of Columbia.

Best,

[REDACTED]
Paralegal Specialist
U. S. Attorney's Office
District of Columbia - Civil Division
Phone: 202-252-[REDACTED]
[REDACTED] 2599
Email: [REDACTED]@usdoj.gov

A series of letters and evidence was delivered to the Southern District of New York in person between December 2021 and September 2023, to DOJ Headquarters through SDNY during 2022 and 2023, and to the DOJ Assistant Inspector General for Investigations (Interline Exhibit 19, LPEE pages 368-793, LPEEV65-11-16).

B. The Lead Plaintiff's communications attempts are evidenced in extensive exhibits throughout this complaint, both inline and in hundreds of pages and dozens of letters included the LPEE herein. No other contact from any U.S. executive branch police powers operation has ever been forthcoming, with the notable exception of the FBI's September 30, 2021 "liar letter" coordinated in September 2021 with a prior admission, then quick retraction twelve days later by defendant NYPD shown in series in Interline Exhibits 17 through 18 herein. A 2022 no interest letter series with the DOJ Assistant Inspector General for Investigations is at Interline Exhibit 19.

C. All subcounts throughout this Complaint are driven by defendants' conspiracy to commit and comprise an integrated pattern of illegal acts including racketeering acts, which both

individually and as a pattern of practice, would reasonably be expected to engage the interest of elements of the Department of Justice, rather than no element of that Department.

D. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 621 RGTS-1 subparagraph F is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	17 through 19
Complaint paragraphs:	320, 462-463, 518
Appendix 2 paragraphs:	1-038, 1-040 through 1-059, 1-067
LPEE Table 2 pages 12023-12120 paragraphs:	2-0116 through 2-0119, 2-0154, 2-205 through 2-0207, 2-0210
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 368-794, 797-865, 934-1075, 11630-11936, LPEEV65-10-16

Emails and documents by topic and date, also located in LPEE:	Not applicable
---	----------------

629. RGTS-9 Rights Violations: Bad Faith Acts – Illegal General Searches, Continual Monitoring in Involuntary Servitude 1968 to present

A. As forensically reverse engineered, defendant UNITED STATES first directly abused Lead Plaintiff in 1968 with interstate human trafficking to California, paragraph 417. Defendant UNITED STATES has and does fraudulently and repeatedly engage in prejudicial acts, violations, and injuries against Lead Plaintiff and his constitutional rights from the age of 12 as a minor child, through his high school years, through college and graduate school, and through captive employment thereafter, to and through his last permitted employment in 2008 and through all prior and current period attempts by Lead Plaintiff to engage in interstate commerce. Defendant UNITED STATES has and does engage in the hacking of Lead Plaintiff's personal computer and printers, used for both personal and business matters, beginning around 1984 and into the present time.

B. At all times, defendant UNITED STATES and its co-conspirators have and do invade his privacy, and monitor his communications whether by email, telephone, or cellular phone, including arranging through his spouse, then a newly hired employee of US West Cellular, cellular car telephone service in the 1980s from AT&T's cellular telephone service, later used in a double murder attempt on Lead Plaintiff and spouse Lynne in British Columbia (paragraph 694 LETHL-1). This US West subsidiary, also a previous client of Lead Plaintiff while serving as a consultant at Deloitte Seattle, was used to track movements, to listen to in-car conversations and communications, and to sustain their pattern of involuntary servitude, manipulation, and control of Lead Plaintiff.

C. One specific example of fraudulent color of law falsely pretexted searches conducted by police powers: While in Boston's Pine Street Inn, unknown police powers defendants engaged in warrantless illegal searches using a housing pretext with no intention of providing housing as the basis for an illegal search. This search was comprised of two urine tests undertaken soon after Lead Plaintiff's arrival around April 2006 ostensibly as a condition of securing housing. Soon after the second test, the staff member administering the tests announced that the program had been cancelled.

D. Defendant UNITED STATES has and does arrange for the continual public monitoring of all Lead Plaintiff's private activities in his personal residences to and including the preparation of this complaint, normal hygiene activities, food preparation, doctor visits, drug prescription fulfillment, control of persons who are permitted to interact with and meet him using electronic means, entertainment venues, performances and nearby patrons, and the myriad other acts comprising normal daily life in the United States and other nations where he has travelled at various times and nearly all times since the early 2000s.

E. Some of this monitoring is essential to personal security due to the public corruption which has and does cause this security concern given his global visibility and the political desire to project political stability in the United States to the domestic population and to the world at large, as well as to secure him from persons seeking to make violent and hateful political statements or to conceal prior criminal acts undertaken in public corruption of United States' domestic police powers operations and corruption in its international intelligence and espionage operations. But the root cause of the entirety of this claimed necessity is public corruption, to and including, without limitation, defendant DOJ's series of Attorneys General and its subordinate agencies, which dates back decades to the 1950s and the initial stages of these

illegal programs perpetrated by defendant ARMY, CIA, DOJ, FBI, and other police powers defendants which have no legal basis in law nor in our Constitution.

F. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 621 RGTS-1 subparagraph F is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	417-418, 694 LETHL-1
Appendix 2 paragraphs:	Entirety
LPEE Table 2 pages 12023-12120 paragraphs:	Entirety
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 770-772, 783-784, 10251-10255, 10376-10393, 10434-10444
Emails and documents by topic and date, also located in LPEE:	D Brewer reply to DOJ OIG decline ltr 220325, DOJ OIG Institutional Contacts 211109,

	DOJ OIG From Investigations 220128 Div Ack Letter 220128, DOJ OIG Decline Ltr 220322, NJ EDC Inquiry 200805, NJ Unemployment Hangup and shelter info request 081217, Wire Fraud Examples Raising Consciousness of Guilt 221004
--	--

630. RGTS-10 Rights Violations: Bad Faith Acts – Privacy and Quiet Enjoyment 1968 to present

A. As forensically reverse engineered, since approximately 1968, Lead Plaintiff's life, relationships, family life, physical health, emotional well-being, career, businesses, life circumstances, and public reputation, as well as all human, Constitutional, civil, and legal rights have been usurped and subsumed by the illegal acts, violations, and injuries of defendant UNITED STATES and its co-conspirators.

B. Lead Plaintiff was, without consent, designated as an involuntary servant of defendant UNITED STATES as a minor child. Lead Plaintiff's formal petitions in 2005 under FTCA for limited injuries, as then understood, were never answered by any defendant UNITED STATES department, agency, nor the Executive Office of the President. By their acts, violations, and injuries, he was rendered homeless, and human trafficked to further homelessness in Boston, MA. A litigation attempt in U.S. District Court at Newark, NJ, was indirectly answered by defendants through their illegal racketeering acts. By their acts, violations, and injuries, he was rendered homeless, then involuntarily committed to a psychiatric hospital (Bergen Regional Medical Center) for two weeks, followed by a bureaucratically obstructed further 5.5 months, for a total of six months. In 2022, as this entire pattern of facts was first reasonably well understood and communicated to a US Attorney's Office, defendants again answered indirectly with BRMT assisted attempts on the Lead Plaintiff's life, and through their still on-going and

persistent pattern of threats and violence (paragraphs 707-710 LETHL-14-17, Interline Exhibit 15).

C. Defendant UNITED STATES and its co-conspirators desperately seek to avoid legal liability for their associated-in-fact enterprise, their patterns of racketeering and civil rights conspiracy and acts of violence, and their patterns of terror. Terror acts include, without limitation, at least three mass casualty attempts, the most recent against an express train traveling 50 to 60 miles per hour enroute to New York City on the evening of September 11, 2022 which directly threatened the lives of about 300 people in addition to the Lead Plaintiff (paragraph 707 LETHL-14).

D. The broad sweep of about fifty-five years and nearly uncountable acts, violations, and injuries by defendant UNITED STATES and its co-conspirators, including thousands of examples presented in this Complaint and the accompanying exhibits which, together with the violations of five international treaties (paragraph 251), are systematic violations of RICO, civil rights, and the powers of limited government envisioned by the founders.

E. The Constitution, from its ratification in June 1788, was and is intended to restrain the federal government from replacing the tyranny and oppression of a King with new forms of the same patterns of practice, not replace one form of government with another which functionally continues those same patterns. Our institutions continue to fail us rather dramatically in these matters, including in their neglect to prevent (per 42 U.S.C. Chapter 21) acts, violations, and injuries against both enumerated and unenumerated rights of Lead Plaintiff and others of this class, each and every one of whom is, together with all others, entitled to the quiet enjoyment of life, liberty, family, and property; to the pursuit of happiness rather than the imposition of coercive psychological operations and BRMT driven suicide ideations; and to the protections of

the rule of law, rather than to involuntary servitude with their lives being dictated – past, present, and future – to the whims of government executives, managers, remote BRMT operators, and undercover police powers acting with impunity under color of law and subjecting these plaintiffs to the dangers of public vigilantes.

F. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants’ long-running schemes, frauds, and swindles to sustain defendant UNITED STATES’ involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	251, 707-710 LETHL-14-17
Appendix 2 paragraphs:	Entirety
LPEE Table 2 pages 12023-12120 paragraphs:	Entirety

LPEE pages (see technical note on page numbering at paragraph 230):	Entirety. LPEEV65-3, 5
Emails and documents by topic and date, also located in LPEE:	Entirety

631. RGTS-11 Rights Violations: Bad Faith Acts – Biological and Medical Invasions, Access to Basic Health Care Lifetime

A. As forensically reverse engineered, defendant UNITED STATES and its defendant co-conspirators deprive Lead Plaintiff of access to basic health care services using a variety of means including, without limitation, through involuntary servitude, peonage, and penury inflicted by denial of employment, and by theft of compensation, by theft of personal services, by deprivation of access to unemployment benefits payments, and by using email fraud and wire fraud (paragraphs 490-584). Defendant UNITED STATES and its defendant co-conspirators denied access to initial Covid-19 vaccinations series 149 times when eligible (paragraph 704 LETHL-11 and LPEE pages 9875, 10187-10250); to medical doctors; to prescription medications essential to treat the illegal BRMT induced mental depression ranging to suicide ideation (paragraphs 604-606 HEXP-1-3), while defendant UNITED STATES was fully aware of the broad spectrum of biochemical and physical abuses it has been and does inflict with its illegal BRMT bioweapon and bioweapon delivery system during periods of unemployment, peonage, penury, and forced unemployment.

B. This awareness is most clearly demonstrated by the physical presence of two undercover officers on the southeast corner of Thompson Lane and River Road, Edgewater, NJ, who stood in front of and blocked the Lead Plaintiff's path to cross this very busy street at this particular moment on this particular day of suicide ideation between 2008 and 2010 (paragraph 606, HEXP-3). Defendants also blocked access to basic preventative dental services, exams,

checkups, and other routine but essential preventative services, resulting in the loss of teeth and the onset of infections in teeth, which have and do risk infections spreading to the brain and other parts of the body. Defendant UNITED STATES bears complete and total responsibility for these acts, violations, and injuries, as Lead Plaintiff has been and is conscientious about seeking affordable medical care when needed at all times.

C. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 621 RGTS-1 subparagraph F is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	490-584, 604-606, 617 HEXP-1-3, 14 704 LETHL-11
Appendix 2 paragraphs:	1-039, 1-067

LPEE Table 2 pages 12023-12120 paragraphs:	2-0001 through 2-0006, 2-0059, 2-0067, 2-0076, 2-0117, 2-0118, 2-0159, 2-0167, 2-0196, 2-0205
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al; pages 9875, 10187-10250, 11656-11664, 12160-12232, LPEEV65-2, 3, 13, 15
Emails and documents by topic and date, also located in LPEE:	Bergen Covid Exec emails 210324, Bergen Covid Exec emails 210326.

Direct Interferences in Personal and Intimate Relationships

632. RGTS-12 Rights Violations: Personal and Intimate Relationships - Managed Romantic Interests, Arranged In-Person Meetings 2004-2005

A. As forensically reverse engineered, defendants, in late 2004 and continuing in 2005 use an ostensibly drunken female bar patron in hot pants, an in-person bar pickup, and other females of interest as they screen-in and screen-out women placed in the presence of Lead Plaintiff. Lead Plaintiff expended personal funds during these screened and manipulated in-person events in the Kirkland, WA area. Additional computer files and electronic calendar evidence noted by Lead Plaintiff during this period and related to this sequence is currently in the hands of defendant UNITED STATES, as it was personally handed to ROSENBERG (FBI) by Lead Plaintiff at ESTABLISH around October 2007 and had likely been recovered by an FBI lab working through a cover company website. Paper based documentation of these events may have been scanned or photographed by defendant UNITED STATES, specifically FBI or USPIS, during mailing to and from New Jersey to Washington in 2010 and 2011 by Lead Plaintiff as he was trafficked from Cliffside Park, NJ through Bergen Regional, coercion and duress, to Ramsey, NJ (paragraph 522-524, 606 HEXP-3G-K, 611H(xii)-(xv) HEXP-8, 630 RGTS-10B, 643 RICO-5C-H).

B. Defendants have and do continue this romantic and intimate interests manipulations through 2024 by purposefully screening-in and screening out potential romantic interests using

wire fraud on dating sites, and his known concern to retain traceability of these manipulations, primarily to sustain isolation of Lead Plaintiff. Defendants also placed BRMT manipulated romantic interests in his life (see paragraphs 611-614 HEXP-8 through HEXP-11, LPEEV65-4).

C. On knowledge and belief, defendant UNITED STATES has and does also orchestrate and conduct such interferences of certain of his romantic partners and their interests to manage this aspect of the lives of these various plaintiffs, who are themselves also BRMT injured and trafficked members of this class. These victims include at least both former spouses (Lynne and Jeanette), one college girlfriend (Susan Irish), and one close college female friend (Katherine Andrews). Given the ease of remote surreptitious illegal BRMT bioweapon and bioweapon delivery system hijackings and the obvious misogynistic character of certain individual defendants hereto personally known to the Lead Plaintiff, there are undoubtedly many more people who comprise this class of unwitting victims who are as yet unidentified plaintiffs.

D. Defendant UNITED STATES most probably employed this method of extreme BRMT abuse to orchestrate the murder of Audrey Brewer in September 2011 (paragraph 10) using an physically and emotionally abused female intermediary as the direct perpetrator while acting in apparent extreme jealous rage under the direct influence of the illegal BRMT bioweapon and bioweapon delivery system used to physically hijack her pineal gland for explosive adrenaline surge to provoke the knife slashing attack, which resulted in Audrey Brewer's death from the fatal slashing of her carotid artery in her neck. The female perpetrator had absolutely no history of violence at any time but was also being psychologically provoked by the manipulative male who was involved in relationships with both women at various times. The psychological abuse of the apparent perpetrator was the plausible explanation for the attack, which concealed the actual BRMT perpetrator of the extreme BRMT biomedical manipulation

from being exposed as the root perpetrator. BRMT is a highly classified weapon system, not previously known in human history, certainly not known to local police departments, which leaves absolutely no trace evidence of the series of carefully focused energy pulses absorbed by the brain to cause the extreme adrenaline surge.

E. The momentary sense of extreme rage (adrenaline), which was most probably experienced by the knife wielder in that fatal moment, is comparable to the momentary biochemical rage induced in Lead Plaintiff by the illegal BRMT bioweapon and bioweapon delivery system in the 2023 Subway Tunnel Flash Incident documented at paragraph 619 HEXP-16, LPEE pages 11668, and as he experienced during an unrecorded incident while walking one morning past the gas station adjacent to his Cliffside Park, NJ residence between August 2008 and October 2010. The intent of defendant UNITED STATES in orchestrating this illegal BRMT bioweapon and bioweapon delivery system operation against US persons (Lead Plaintiff, Audrey Brewer, Lead Plaintiff) was most probably to test and field deploy it in a specific deadly manner to demonstrate its field effectiveness for its future deployment against others which defendant UNITED STATES (CIA) targets for assassination in its field operations.

F. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention

directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	10, 522-524, 606 HEXP-3G-K, 611H(xii)-(xv) HEXP-8, 611-614, 619 HEXP-8 through HEXP-11, 16, 630 RGTS-10B, 643 RICO-5C-H
Appendix 2 paragraphs:	
LPEE Table 2 pages 12023-12120 paragraphs:	2-0115, 2-0148, 2-0188, 2-0192
LPEE pages (see technical note on page numbering at paragraph 230):	1 et al, 140 et al, 441-459, 11668, LPEEV65-1, LPEEV65-4
Emails and documents by topic and date, also located in LPEE:	Not applicable

633. RGTS-13 Rights Violations: Personal and Intimate Relationships – Blocked and Spoofed Access to Dating Sites 2004-2005, 2007-2008, 2011-2014, 2018 to present

A. As forensically reverse engineered, defendants have and do use online dating platforms, including those of MATCH GROUP and BUMBLE, or their spoofing by an unknown defendant police powers operation, to completely block Lead Plaintiff from all access to dating site participants among the general public to orchestrate the relationships elected by defendant UNITED STATES (paragraphs 612-615 HEXP-9-12). When Lead Plaintiff has and does recently (late 2023 to present) provide direct feedback about these specific forms of *First* Amendment civil rights violations to the other party on dating sited of interferences, criminal

deprivation of rights, and conspiracy against rights, to these imaginary dates, the texts related to this conversation are most frequently subsequently deleted by unmatching which removes this evidence from the Lead Plaintiff's phone app. For example, police powers use of the Hinge app, where this destruction of evidence is accomplished by the website administrator claiming that the match was a fraud, withdrawing the match, and thereby automatically deleting it from the Lead Plaintiff's phone application, which destroys the evidence of the defendants' knowing, clear, and continuing violations of the Lead Plaintiff's *First* Amendment civil rights as communicated directly to the perpetrators of these acts (LPEEV65-4). This can also be accomplished by unmatching by the imaginary prospective date, actually defendant police powers personnel violating the *First* Amendment, to wit, in an egregious and durable pattern of violations of 18 U.S.C. §§ 241, 242, and Title 42 Chapter 21 Civil Rights.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 621 RGTS-1 subparagraph F is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual

defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	611-614 HEXP-8 through HEXP-11
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0115, 2-0148, 2-0169, 2-0184, 2-0188
LPEE pages (see technical note on page numbering at paragraph 230):	LPEE pages as shown at 611-614 HEXP-8 through HEXP-11 incorporated here by reference, LPEEV65-4, 6, 7
Emails and documents by topic and date, also located in LPEE:	LPEE emails and documents as shown at 611-614 HEXP-8 through HEXP-11 incorporated here by reference

634. RGTS-14 Rights Violations: Personal and Intimate Relationships - Managed Romantic Interests, Fraudulent Dates 2004-2005, 2008, 2019-2020

A. As forensically reverse engineered, 2004-2005: Defendants used the online dating platform Match.com, a Match Group website, or its spoofing by an unknown defendant police powers operation, to arrange approximately 15 to 20 fraudulent dates with defendant police powers agents, officers, and confidential informants in the greater Seattle, WA and Tacoma, WA area and the greater Portland, OR area. Lead Plaintiff spent over \$1,000 for in-state and interstate travel and to pay for meals and other entertainment during these fraudulent dates in late 2004 and the first half of 2005, arranged using email and other electronic means. Documentation is available through the discovery process, including the recovery of the Lead Plaintiff's own records currently in the hands of defendants, as well as the routine police reports of these incidents controlled by defendants. Additional computer files and electronic calendar evidence noted by Lead Plaintiff during this period and related to this sequence is currently in the hands of defendant UNITED STATES, as it was personally handed to defendant

ROSENBERG (FBI) by Lead Plaintiff at defendant ESTABLISH in Fall 2007 around October and had likely been recovered by an FBI lab working through a cover company website. Paper based documentation of these events may have been scanned or photographed by defendant UNITED STATES, specifically FBI or USPIS, during mailing to and from New Jersey to Washington in 2010 and 2011 by Lead Plaintiff.

B. 2007-2008: Defendants, used various online dating platforms including Match, or spoofing by an unknown defendant police powers operation as they screened-in and screened-out women of interest to Lead Plaintiff in 2008, resulting only in the brief relationship with defendant MODDERMAN, paragraph 611 HEXP-8.

C. All other members of the public were (and are) systematically excluded by the acts of defendants UNITED STATES, FBI, and ROSENBERG, to orchestrate the maximum detrimental psychological impact on Lead Plaintiff during the ESTABLISH termination, PANKOWSKI wedding, MODDERMAN start, stop, then attempt resume sequence in Summer 2008 (paragraph 611 HEXP-8), as the imagined terror investigation pretexted by FBI and ROSENBERG and underway by regional Joint Terrorism Task Forces continued in the background in NYC and NJ.

D. Documentation is available through the discovery process, including the recovery of the Lead Plaintiff's own records currently in the hands of defendants, as well as the routine police reports of these incidents controlled by defendants. Additional computer files and electronic calendar evidence noted by Lead Plaintiff during this period and related to this sequence is currently in the hands of defendant UNITED STATES, as it was personally handed to defendant ROSENBERG (FBI) by Lead Plaintiff at defendant ESTABLISH in Fall 2007 around October and had likely been recovered by an FBI lab working through a cover company

website. Paper based documentation of these events may have been scanned or photographed by defendant UNITED STATES, specifically FBI or USPIS, during mailing to and from New Jersey to Washington in 2010 and 2011 by Lead Plaintiff.

E. 2018 to present: Defendants use online dating platforms, Hinge, Plenty of Fish, Elite Singles, Black People Meet, Tinder, Bumble, Adult Friend Finder, eHarmony, Zoosk, Ashley Madison, OKCupid, or spoofing of these sites by an unknown defendant police powers operation from 2018 and orchestrate a series of approximately 15 to 20 fraudulent dates with defendant police powers agents, officers, and confidential informants in the greater New York City area in 2019-2020. All these dates require interstate travel from Lead Plaintiff's residence in Edgewater, NJ to various parts of New York City, NY. Lead Plaintiff spends over \$1,000 to travel to and pay for meals and other entertainment during these fraudulent dates arranged using email and other electronic means. Documentation is available through the discovery process, including the recovery of the Lead Plaintiff's own records currently controlled by defendants, as well as the routine police reports of these incidents controlled by defendants, also LPEEV65-4.

F. Defendants have and do continue this romantic and intimate interests manipulation which is a 100% freeze out from any direct personal contact through these sites from 2020 through the present time and have and do terminate all online discussions without any direct in-person contact to sustain isolation of Lead Plaintiff, and to destroy evidence of the police powers corruption narrative which Lead Plaintiff uses to identify these continuing interferences in defendant UNITED STATES' and other defendants in their knowing decades-long and continuing violations of human, Constitutional, and civil rights.

G. On knowledge and belief, defendant UNITED STATES also has and does orchestrate and conduct such interferences of his romantic partners and their interests to manage this aspect

of the lives of other unidentified plaintiffs, who are themselves also members of this class. These victims have included both spouses, one college girlfriend, and one close college female friend.

H. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 621 RGTS-1 subparagraph F is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	611 HEXP-8
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0115, 2-0148, 2-0169, 2-0184, 2-0188
LPEE pages (see technical note on page numbering at paragraph 230):	1 et al, 140 et al, 441-459, from 611-614 HEXP-8 through HEXP-11 incorporated here by reference, LPEEV65-4, 6, 7
Emails and documents by topic and date, also located in LPEE:	Match Group Second Notice re Preserve Evidence 220122,

	Match EPL Response 221110, Match Group Legal Dept Email 221110 Also see LPEE pages listed at 611-614 HEXP-8 through HEXP-11 incorporated here by reference
--	---

Hacking, Harassment, Disinformation, Abuse of Official Records

635. RGTS-15 Rights Violations: Illegal Searches, Hacking, and Harassing, Computer Technology

A. Defendants have and do fraudulently and repeatedly engage in the hacking of Lead Plaintiff's personal computer and printers, used for both personal and business matters beginning around 1984 and into the present time including, without limitation, for the purposes of suppressing and destroying evidence of their criminal acts such food contamination (paragraph 620 HEXP-17), suppressing printing of predicate act evidence for submission to federal court (DC 23-cv-0415, related at Appendix 1, and docketed at DC 23-mc-014), managing his unemployment compensation access (paragraph 642 RICO-4), and his work with public charities (paragraph 526). They have and do create technical hacks to, without limitation, (i) pretext phone support troubleshooting opportunities, (ii) physical disable personal computers and force their physical repair, (iii) perform fraudulent online system updates of Windows 10 and various applications, as well as (iv) Android updates of cell phone software, all of which then have been and are used by defendant UNITED STATES to, without limitation, (a) strip data, (b) to install and remove malware and keyboard loggers, (c) to permit personal computer video camera operation without consent, (d) to create remote printer and other computer hacks which require (e) harassing forms of customer support use by Lead Plaintiff while (f) failing to solve the problem they created and (g) shifting responsibility among various in-house assets to perpetuate these frustrations of Lead Plaintiff.

B. Defendants also cause and create circumstances requiring the Lead Plaintiff to replace or return non-functional equipment at considerable expense on his very limited financial resources (also subject to control and to asset stripping by defendant UNITED STATES and co-conspirators, see for example LPEEV65-18 third printer disabled during complaint preparations). Defendants have and do systematically violate the *First*, *Fourth*, and *Fifth* Amendment rights, among many other rights, of Lead Plaintiff, and have and do continuously fail to respect, much less protect, those rights, as evidenced by the comprehensive official silence of defendant UNITED STATES and co-conspirators including, without limitation, defendant NYPD, paragraphs 550-584, Interline exhibits 17-19.

C. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 621 RGTS-1 subparagraph F is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE

Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	526, 620 HEXP-17, 642 RICO-4
Appendix 2 paragraphs:	1-067
LPEE Table 2 pages 12023-12120 paragraphs:	2-0207, 2-0215 through 2-0217
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al; pages 371, 473, 544, 549, 566-573, 575-576, 599, 603, 609-612, 770-771, 783, 6044-6084, 10251-10255, 10259-10301, 10423-10433, 10434-10444, 11673-11925, LPEEV65-6, 7, 18
Emails and documents by topic and date, also located in LPEE:	Not applicable

636. RGTS-16 Rights Violations: Blocking Information Access and Supplying Deliberate Disinformation

A. Defendants have and do block, continuously surveil, and/or spoof Lead Plaintiff's access to various online services both in-state and interstate, including, without limitation, dating sites; news sites including, without limitation, New York Times, Washington Post, Wall Street Journal, Al Jazeera, and others; corporate sites for shopping, technical support, customer service, and other commercial purposes; performance and performance ticketing sites, and many others, including all online activities.

B. Brain-computer interface company sites were also actively suppressed by defendant UNITED STATES from Lead Plaintiff's view from at least as early as 2012 (Synchron's founding date, paragraphs 374-375) into 2021, as they were and are a vital element of corroborating evidence of the scientific and technical feasibility of the illegal BRMT bioweapon and bioweapon delivery system to place before non-technical US District Court, to assist in their evaluation of the threshold veracity of Lead Plaintiff's novel technological claims made in accordance with the *Denton* mandate.

C. Defendant UNITED STATES has and does fraudulently fail, despite their direct control of access, to prevent certain hacks, performs others of their own making, and abuses paid services to sustain defendants' involuntary servitude, control, and manipulation of Lead Plaintiff, including to arrange various captive events, to control who are the audience members who surround him at captive and public events attended by Lead Plaintiff, including his public charity volunteer work, which Lead Plaintiff attends alongside defendant police powers agents, officers, confidential informants and/or performance actors, in their scheme to manage and control the actions of Lead Plaintiff, including, without limitation, in the sequence of programmed events which used the Club FreeTime website to orchestrate attendance at these functions, see Interline Exhibit 15A (July 16, 2022 direct verbal threat), LPEEV65-5.

D. This spoofing and/or blocking of various websites, has and does include the blocking of accurate information access, and its absence or replacement by other false and misleading information, which is intended to mislead and/or publicly discredit the Lead Plaintiff when he cites this incorrect information, currently continues under defendants' direction and control, LPEEV65-4.

E. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention

directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953).

Paragraph 621 RGTS-1 subparagraph F is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	16
Complaint paragraphs:	374-375
Appendix 2 paragraphs:	1-067
LPEE Table 2 pages 12023-12120 paragraphs:	2-0129, 2-0141, 2-0148, 2-0169, 2-0171, 2-0179, 2-0179, 2-0180, 2-0185, 2-0199, 2-0200, 2-0202, 2-0205 through 2-0207
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al; pages 548-549, 576, 582-597, 771-772, 782, 10251-10255, 10259-10301, 10423-10433, 10614, 10620. See also beginning page 148 paragraphs 28, 31, 42, 44-48, 51-52, 55, 58, 60, 64-68, 72-77, 83-95, 11738-11739, 11743-11748, 11760-11870, 11871-11886, 11908-11925, LPEEV65-4, 5
Emails and documents by topic and date, also located in LPEE:	Certain time periods continue to be blocked by defendant UNITED STATES computer hacks

637. RGTS-17 Rights Violations: Misuse of Official Records, Mispersonation, Dubai 2015

A. As forensically reverse engineered, Lead Plaintiff encountered an online dating match from the greater New York City area in 2014 while living in Ramsey, NJ. As that online discussion proceed, it turned out that the white female “Laura” who lived in “Ghana” (paragraphs 612 HEXP-9, 622 RGTS-2). Between 2014 and 2018, defendant UNITED STATES combined email and wire frauds with illegal BRMT bioweapon and bioweapon delivery system oxytocin (love hormone) hijacking to orchestrate and perpetuate a series of thefts totaling more

than \$14,000 from Lead Plaintiff via Western Union and other money transfer sites which permit anonymous pickup of cash; as well as two cell phones, mailed Sep. 9, 2015 (LPEE page 7845), mailed Nov. 15, 2015 (LPEE page 7824), a PlayStation 1, game cartridges, and several dvd movies which the unwitting Lead Plaintiff to Ghana – (CIA field asset), addressed to Prince B. Quaye, Agona Swedru, Ghana as directed by Laura AKOTO. This provided a CIA asset with two clean cutout phones for use in Africa.

B. This sequence is tightly correlated to the illegal use of Lead Plaintiff's U.S. passport (per CPB travel record, LPEE page 540) where Lead Plaintiff supposedly departed to Dubai on May 2, 2015. Lead Plaintiff had planned this trip and purchased the air ticket but cancelled a few days prior to departure (non-refundable ticket) due to the late addition of an advanced fee (known to be unaffordable) a few days prior to the Lead Plaintiff's already paid and scheduled departure. The air ticket was used by a CIA exfiltrator traveling on Lead Plaintiff's passport to Dubai. The unwitting Lead Plaintiff then used International postal services were then used to deliver the phones, Playstation I, game cartridges, and movies to Ghana in September and November 2015.

C. Around 2017 Laura asked Lead Plaintiff to relay payments among two international parties through his US bank account. He agreed to do this, and later expressed discomfort, and halted the practice after one or two transfers, specific emails below:

AKOTO Laura re \$2K to Mr Prince from Porter Patten \$3K 171021,
AKOTO Hints of money laundering entrap scam 171025

D. This was an FBI structured payments entrapment attempt with no legal basis or foundation as Lead Plaintiff has never engaged in such practices nor expressed any interest in doing so. "Laura" was FBI's bait and a carefully pretexted trap demonstrating FBI culpability

and FBI/CIA *mens rea*, since it incorporated the pattern of theft of funds and phones sent to Ghana using Lead Plaintiff as a cutout for sending phones not traceable to defendant UNITED STATES through Lead Plaintiff.

E. Simple replacement of the Lead Plaintiff's picture and physical description on a blank duplicate passport accessible to CIA by defendant UNITED STATES was all that was needed to complete this specific exfiltration of a CIA asset to Dubai. According to these records, Lead Plaintiff left the United States on May 2, 2015 and has never returned, CPB at LPEE pages 537-541. Lead Plaintiff was also used in September and November 2015 to supply two cell phones to a CIA operative in Ghana who had traveled to Dubai using the Lead Plaintiff's passport number in May 2015 as defendant CIA abused the Lead Plaintiff with the illegal BRMT bioweapon and bioweapon delivery system to hijack and manipulate his oxytocin level, creating and gradually escalating his biochemically-driven online romantic interest in the imaginary Laura Akoto, in whose name an anonymous party (defendant CIA personnel) also received about \$14,000 of untraceable funds sent via Western Union and other money transmission services from the Lead Plaintiff.

From: [Dennis Brewer](#)
To: [laura akoto](#)
Subject: Hi Love
Date: Wednesday, September 9, 2015 8:22:44 AM

Sorry we could not chat. Things are going well. Had our last meeting with vendors yesterday and met my consultant on the packing plant. Have a contract for the \$22 million raise, may sign today or tomorrow.
Hope all is well with you. Your [phone](#) was mailed yesterday. Love you very much.

F. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude

over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953).

Paragraph 621 RGTS-1 subparagraph F is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	612 HEXP-9, 622 RGTS-2
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	Not applicable
LPEE pages (see technical note on page numbering at paragraph 230):	8453
Emails and documents by topic and date, also located in LPEE:	Not applicable

Racketeering – (RICO series offenses)

638. All RICO acts, violations, and injuries (RICO-1 through RICO-55) have been forensically reverse engineered and have and do comprise a durable, integrated pattern of associated-in-fact enterprise pattern racketeering acts, violations, and injuries, by these

over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953).

Paragraph 621 RGTS-1 subparagraph F is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	612 HEXP-9, 622 RGTS-2
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	Not applicable
LPEE pages (see technical note on page numbering at paragraph 230):	8453
Emails and documents by topic and date, also located in LPEE:	Not applicable

Racketeering – (RICO series offenses)

638. All RICO acts, violations, and injuries (RICO-1 through RICO-55) have been forensically reverse engineered and have and do comprise a durable, integrated pattern of associated-in-fact enterprise pattern racketeering acts, violations, and injuries, by these

defendants, as defined in accordance with 18 U.S.C. §§ 1961-1968; and in accordance with Congressional intent in PL 91-452 (RICO) October 1970 that 18 U.S.C. §§ 1961-1968 be liberally construed to effect its intended purpose:

"(a) The provisions of this title [enacting this chapter and amending sections 1505, 2516, and 2517 of this title] shall be liberally construed to effectuate its remedial purposes."

Thefts and Takings Targeted at Personal Assets

639. RICO-1 Racketeering Violations: Involuntary Servitude, Forced Labor, Human Trafficking, Entrapment Attempts and Entanglements – Obstructing Market Rate Private Employment and Interstate Commerce From Deloitte (1979) through Establish (2008)

A. As forensically reverse engineered, fraudulent takings resulting from the defendants' careful timing of events contrived by defendants to appear as life circumstances and events have been and are used to control and human traffick Lead Plaintiff through a series of physical and emotional traumas including the selection, assignment, and destruction of teenage and adult relationships; destruction and recovery of physical and mental health; tortures and suicide ideations; homelessness; enterprise and employment failures; de facto takings of real and financial assets; various emergency situations with barely avoided lethal consequences; among other traumas, many of which are directly created by or arise from the defendants direct acts and their willful violation of the privacy of the Lead Plaintiff to expose him to risks resulting from adverse exposure to the general public and vigilantism. All these acts against Lead Plaintiff's interests, life, and liberty, are elements of and arise from defendants' associated-in-fact enterprise pattern of racketeering acts, including, without limitation, their commercial and police powers frauds and conspiracies in commerce and interstate commerce, and violations of individual rights and liberties protected by the Constitution, laws, and treaties of the United States of America (paragraphs 414-534).

B. Each and every act against the Lead Plaintiff included in the inline evidence herein at all paragraphs, and each and all the LPEE evidentiary exhibits incorporated herein by reference, are representative of the array of injuries to other similarly situated plaintiffs by these defendants, though certain plaintiffs likely did not survive these acts by these defendants and must therefore be represented through their heirs and estates.

C. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). RGTS-6 subparagraphs A through C are incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4 through 14
Complaint paragraphs:	414-534; 639-648 RICO-1-10 generally
Appendix 2 paragraphs:	1-010, 1-015, 1-017 through 1-023, 1-025, 1-031, 1-032

LPEE Table 2 pages 12023-12120 paragraphs:	Entirety of column entitled: Actions: Destroy Career, Businesses; Pretext, Entrap, Incriminate
LPEE pages (see technical note on page numbering at paragraph 230):	10311-10364, 10376-10393, LPEEV65-6, 7
Emails and documents by topic and date, also located in LPEE:	Mail and email blocks and website spoofs and hacks as described at NSEC, RGTS, and RICO subcounts incorporate predicate acts which preclude valid First Amendment protected rights and communications, which are consistently violated by defendants. See also Complaint paragraph 70 for a separation of powers example of defendants' contempt for First Amendment rights, and paragraph 74 for relevant demonstrations of contempt for Fourth Amendment rights, all of which proceed with minimal, if any at all, adverse consequences ever against these defendant perpetrators (paragraph 40).

D. These schemes and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). RGTS-6 subparagraphs A through C are incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable

indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4 through 14
Complaint paragraphs:	99l., 170, 219, 222, 226, 275(i), 276, 320f(iv), 337, 414-534, 543, 563; 601 602 NSEC-2, 3; 612, 613 HEXP-9, 10; 623, 624, 626, 627A, 629 RGTS-3, 4, 6, 7, 9; 640-653, 655, 656C, 658-661, 667, 668, 670, 672-693 RICO-2-15, 17, 18, 20-23, 29, 30, 32, 34-54
Appendix 2 paragraphs:	1-007 through 1-010, 1-015, 1-017 through 1-023, 1-025, 1-031, 1-032, 1-067
LPEE Table 2 pages 12023-12120 paragraphs:	2-0001, 2-0036, 2-0039, 2-0045, 2-0047, 2-0050, 2-0053 through 2-0058, 2-0059, 2-0061, 2-0068, 2-0072, 2-0081, 2-0106, 2-0107, 2-0110, 2-0111, 2-0113, 2-0114, 2-0115, 2-0117, 2-0122, 2-0134, 2-0135, 2-0140, 2-0141, 2-0150, 2-0157 through 2-0164, 2-0165 through 2-0179, 2-0185, 2-0186, 2-0195, 2-0202, 2-0207; entirety of column entitled: Actions: Destroy Career, Businesses; Pretext, Entrap, Incriminate
LPEE pages (see technical note on page numbering at paragraph 230):	1 et al, 11-139, 140 et al, 371, 380, 382, 383-384, 386, 398, 420, 427, 430-438, 440, 463, 473, 474, 486, 518, 549, 542-547, 566-573, 575-576, 599, 602, 603, 609-612, 616-765, 767-768, 770-771, 783, 1740, 6085, 8290, 8291-8293, 8350-8355, 8351-8352, 8370-8373, 8378, 8379, 8411, 8454-8467, 8472-8473, 8474, 8479, 8489-8506, 8507-8514, 8563-8714, 8715-8718, 8770-8787, 8788-8804, 8805-8812, 8813-8854, 8937-8938, 8939-8955, 8956, 9053-9059, 9068-9078, 9093, 9094, 9181, 9193, 9194-9206, 9207-9214, 9219-9222, 9240, 9241-9248, 9256-9259, 9260, 9270-9272, 9275-9276, 9277, 9278-9279, 9280, 9281-9283, 9285, 9300-9306, 9307-9310, 9311, 9312-9313, 9314-9318, 9328-9337, 9340-9391, 9392-9393, 9394-9401, 9406-9534, 9538, 9539-9545, 9547, 9548-9561, 9568-9572, 9573-9591, 9601-9604, 9610-9611, 9636-9637, 9639, 9642, 9645, 9646-9647, 9649, 9651, 9653, 9722, 9727-9728, 9788-9790, 9820, 9840, 9890-9896, 9897-9901, 9902, 9905, 9907, 9917, 9920, 9923, 9925, 9926, 9984, 9985, 9987, 9989, 9991-9993, 9997, 10000, 10002, 10004, 10005, 10007, 10011, 10013, 10014, 10015, 10017, 10021, 10023, 10027 second line, 10028 second line, 10093, 10094; 10095, 10132-10137, noting entries for Arizona destinations and locations, 10750-10771, 10179-10186, noting

	<p>disbursements on (yymmdd) 210706 Delta \$534.40, 210707 JFK \$22.90, 210707 Motel 6 \$2121.54, 210708 Africa Lounge \$23.81, SEPTA \$9.25; 10108-10118, 10138-10613, 11641, 11704-11707, 11708-11726, LPEEV65-6, 7, 8, 9,12</p> <p>AXIAL Investor Interest 150904.pdf AXIAL to ALTAHAWI connect 150910.pdf AXIAL NYC re Investor Referrals 171108.pdf AXIAL re Paine Schwartz 171113.pdf AXIAL NYC FRACTAL Intro 171116.pdf AXIAL NYC FRACTAL stall 171129.pdf AXIAL NYC FRACTAL stall 171204.pdf AXIAL NYC FRACTAL drag out 171206.pdf AXIAL fake investor leads 180302.pdf See Compendium at LPEE pages 934-1075 for other selected relevant emails and documents related to each entity and individuals named in this subcount. Full documentation to be provided in discovery.</p>
Emails and documents by topic and date, also located in LPEE:	See emails and documents listed at all relevant individual subcounts in RICO series and all other subcounts in other series listed at Complaint paragraphs above.
Disbursements in Interstate Commerce (partial listing only, bank statements to be produced during discovery process):	<p>130101 Winnett Perico 2013 Expenses P&L 130101.pdf 130926 JACKSON fee from BA personal acct130926.pdf 150730 Smith 100K Check 150730.pdf 150822 Inv Blue Sky Search150822.pdf 150824 Vista Bus Cards Pd 150824.pdf 150825 Pd Inv Org Trade Assn150825.pdf 150825 Pd Inv Tucson Intel Ofc 150825.pdf 150828 D Brewer Expense report 150824.pdf 150831 PETERSEN 25K Inv Check 150831.pdf 150901 Pd Inv Tucson Intel Ofc 150901.pdf 150916 D Brewer Expense report 150916.pdf 151116 D Brewer Expense Report 151116.pdf 151231 D Brewer Expense Report 151231.pdf 151231 WP Financial Statements 151231.pdf 170126 Smith 5K Wire 170126.pdf 170315 Smith Active 1K Wire170315.pdf 170930 WCC Balance Sheet Only 9-30-2017 170930.pdf 180131 NBH 7469-BUSINESS CHECKING-20180131.pdf 180228 NBH 7469-BUSINESS CHECKING-20180228.pdf 180308 Lance Surety Livestock Dlr Bond 180308.pdf 180320 ADP Quote Reprint 180320.pdf</p>

	180329 NBH Pex Deposit 180329.pdf 180331 NBH 7469-BUSINESS CHECKING- 20180331.pdf 180414 SALLYPORT Wire ACH Information 180414.pdf 180430 NBH 7469-BUSINESS CHECKING- 20180430.pdf 180430 TRADEKEY Orbit ACH 180430.pdf 180501 WEBLINK Pymt180501.pdf 180511 Reprint of ADP Payroll Setup Fees 180511.pdf 180515 TRADEKEY Orbit ACH 180515.pdf 180521 Lux Offices Pd 180521.pdf 180531 NBH 7469-BUSINESS CHECKING- 20180531.pdf 180620 Lux Offices Pd 180620.pdf 180720 Lux Offices Pd 180720.pdf 180726 Smith 30K Note 180726.pdf 180803 Autoklose Paid Invoice180803.pdf 180803 EGM List Pd INV 4479 180803.pdf 180806 EGM Deploy INV 4481 180806.pdf 180905 EGM Email List Rent Pd Inv 4485 180905.pdf 180906 EGM INV 4485 \$300 Completed ACH 180906.pdf 180807 Smith \$18K Wire 180807.pdf 180814 SALLYPORT Fee 2K Wire180814.pdf 180814 TRADEKEY Orbit 3K ACH 180814.pdf 180814 TRADEKEY Orbit ACH 180814.pdf 180816 True Comm Pd 180816.pdf 180823 NAL HUGHES \$2K Wire Details 180823.pdf 180831 ALVAREZ Lori Acctnt Svcs Invoice Pd 180831.pdf 180906 EXACT DATA Fee ACH 180906.pdf 180906 EXACT DATA Rent Agrmt180906.pdf 180925 Right Networks \$25 pd Setup INV180925.pdf 181012 NAL HUGHES \$5000 Compl Wire 181012.pdf 181203 WEBLINK \$500 Wire 181203.pdf 181204 WEBLINK Invoice 181204.pdf 181231 WCC PandL 181231.pdf 181231 WP IRS 1120 18Exp Sched 181231.pdf 181231 WP IRS 1120 for 2015 181231.pdf 181231 WP IRS 1120 for 2016 181231.pdf 181231 WP IRS 1120 for 2017 181231.pdf 181231 WP IRS 1120 for 2018 181231.pdf 190228 NBH 7469-BUSINESS CHECKING- 20190228.pdf 190331 NBH 7469-BUSINESS CHECKING-20190331 (1).pdf 190430 Financials WCC 190430.pdf
--	--

	<p>190430 NBH 7469-BUSINESS CHECKING-20190430.pdf</p> <p>190513 NBH 7469-BUSINESS CHECKING-20190513.pdf</p> <p>190531 NBH 7469-BUSINESS CHECKING-20190531.pdf</p> <p>190630 NBH 7469-BUSINESS CHECKING-20190630.pdf</p> <p>190731 NBH 7469-BUSINESS CHECKING-20190731.pdf</p> <p>191231 WP Financials 2018-2019 191231.pdf</p> <p>201231 SBI General Ledger Detail 201231.pdf</p> <p>201231 SBI Income Statement Detail 201231.pdf</p> <p>210901 DB Reimb for Advance to SBI 210901.pdf</p> <p>210903 GPR 210731 FS Change Notes 210903.pdf</p> <p>210904 GPR INC 073121 GAAP FS 210904.pdf</p> <p>220614 Sheldon Beef Chase Check To 220614.pdf</p> <p>C1 220628 Notes to C1 Ltrs Series 220628.pdf</p> <p>C1 220629 CapitalOne Autopay June 29 220629.pdf</p> <p>C1 220719 CapitalOne WMT late fee dispute 220719.pdf</p> <p>C1 220801 C1 CEO 220629Ltr re Autopay 220801.pdf</p> <p>C1 220805 C1 Letter from 220805.pdf</p> <p>C1 220808 C1 Pymt Corresp 220808.pdf</p> <p>C1 220812 C1 Letter from 220812 .pdf</p> <p>C1 220813 C1 Collections Process 220813.pdf</p> <p>Certain emails are blocked by a defendant UNITED STATES computer hack</p>
<p>Calendared meetings and phone calls in date sequence:</p> <p>Dennis Brewer, WinnettOrganics.com Calendar (partial listing only, bank statements to be produced during discovery process):</p>	<p>Date Party</p> <p>2016</p> <p>1/22 Colby Arkin, NetSuite update</p> <p>2/18 Chris Nichols, Ryder</p> <p>3/17 Ramsey Café Ryder Mtg (Chris Nichols + Mktg VP or Sandra, Controller</p> <p>3/30 Richard MILLER, RAM Consulting</p> <p>4/25 Richard MILLER, RAM Consulting</p> <p>5/2 BA BESTWICK CARDONE Group Group Natural Food symposium Andrew CARDONE</p> <p>6/22 Matt Paul</p> <p>8/11 Libby Leggett re solar greenhouses</p> <p>8/25 NYC Food Investing Conference - intial introduction, Revolution VC</p> <p>9/12 Quentin Cote, LeaseQ</p> <p>9/19 GVC intro call</p> <p>9/26 Michael Callahan (KEENE), Domincik and Dickerman (DD)</p> <p>9/30 Peter Hsuing, DelMorgan introduction</p>

	<p>10/4 CARDONE intro of John Kiely - trust attny</p> <p>10/11 Micheal Callahan (KEENE), DD</p> <p>10/18 Ron MCCORMICK, WALMART Senior Director, Fresh, WebEx call</p> <p>10/26 John Cecilian, Clutch</p> <p>10/27 Jim Case, Champion (re housing at Hyder farm, AZ)</p> <p>11/3 Jim Case</p> <p>11/4 Lance Troutman</p> <p>11/9 Jacob KREMPEL & Jose MERCED, KROGER re organic produce in KPPC Conference room, Blue Vine, OH</p> <p>11/10 Dan Davidson re soils and gypsum addition</p> <p>11/14 Michael Callaahn (KEENE), DD, meeting at NYC office on Lexington Ave</p> <p>11/21 Chris Nichols, Ryder, re update</p> <p>11/23 Ken Ferguson re Hyder ag housing</p> <p>11/29 Britney Smith re Hyder ag housing</p> <p>2017</p> <p>1/6 Sarah Freese re IBM marketing cloud</p> <p>1/27 Dan KREWSON, MULTIFUNDING re loans</p> <p>2/6 SHEFFORD Wire Transfer</p> <p>2/8 Kingman, AZ farm visit w/ Christine J VOLK, realtor, and Jonathan CROSS (BLACKPOOL/SHEFFORD), Bruce Blitch</p> <p>2/17 C Arkin</p> <p>2/21 WALMART Bentonville, AR - Meeting with Ron MCCORMICK, Shawn Baldwin, others in WALMART second floor GPS conference room</p> <p>2/22 Jim Case, Chamion re Gerlach, NV , Hyder, AZ, Kingman, AZ agricultural worker housing</p> <p>2/23 C Arkin, NetSuite, review of NetSuite Professional Services statement of work</p> <p>2/24 SHEFFORD closing sked</p> <p>2/27 J. Buddy Persons re Constsvcs ag housing</p> <p>2/27 C Nichols, Ryder reupdated fleet needs</p> <p>2/28 Dave Wanders, Utica Leaseco</p> <p>4/6 Wendy Berger, re refrigerated facilities development</p> <p>4/26 Steve Monroe, re factor financing NJ</p> <p>5/18 M Callahan (KEENE), DD and staff meeting at DD Lexington Avenue offices, NYC</p> <p>7/11 G Troutman, telcon re SPAC meeting at Chardan offices, Battery Park, NYC</p> <p>7/11 EarlyBird telcon re SPAC meeting at their offices</p>
--	---

	<p>7/11 LOEB & LOEB telcon re SPAC meeting at their offices</p> <p>7/14 J Ju, DD, conference call w/Advantage Capital Partners</p> <p>7/18 Conference call w/HIG</p> <p>8/7 Gordon, MAUGHAN breakfast meeting in Salt Lake City re accounting services</p> <p>8/7 Sam SANDERS, Swan Raelty, travel from Salt Lake City to Idaho Falls, ID for two days at Skaar, then afternoon visits to Wells Fargo Bank, Idaho Falls, Jefferson County offices, then to Teton River Farm and rural residential property near Driggs, ID</p> <p>8/8 Sam SANDERS - Skaar tour complete and return to Salt Lake City, UT for travel home to NJ</p> <p>8/24 Jasper VAN BRAKEL, Armonia, and 2 female team members in NYC shared offices conference room re grassfed beef</p> <p>8/25 Jasper VAN BRAKEL follow-up telcon</p> <p>9/7 JD Kritser, Ranch Partners, Seattle, WA telcon</p> <p>9/8 Stephen O'Hara Riverside Capital, NYC re investment review</p> <p>9/25 Gavin Haladay - Equilibrium Capital, Portland, OR permanent crop investment firm telcon</p> <p>10/30 JD Kritser, Ranchland Partners, Seattle, WA and Fiona Industries ex-CEO John Herring TX feedlot expert call, per email</p> <p>10/31 Visit to Manning Beef, Pico Rivera, CA with Anthony DiMaria</p> <p>11/1 Phoenix, AZ investor meeting scheduled with GREG SMITH, Zach SEASE, both of BANCO Advisors. Both are no shows at their office in Scottsdale with WP employees including Blich and others. Receptionist connects us to BANCO and some of the supposed investors on a conference call while we are at their offices. Afternoon meeting thereafter with Joel GOTTESMAN, Liquid Capital AZ re financing.</p> <p>11/1 Joel GOTTESMAN Liquid Capital early pm restaurant mtg</p> <p>11/13 Gavin Haladay - Equilibrium Capital, Portland, OR permanent crop investment firm telcon</p> <p>11/13 Monday date to confirm Andy Wiegand Peninsula Funds telcon per email on 11/10/17</p> <p>12/22 Lucas Gibson NBH re nat org beef telcon</p> <p>12/27 Lucas Gibson NBH re nat org beef telcon</p>
--	---

	<p>2018</p> <p>1/9 SOLE SOURCE Capital in NYC for meetings with their funders, so Brewer has meeting with TURNER, ROSSI, two others at St Regis King Cole Bar in NYC. Managing Partner ROSSI verbally commits to funding Winnett Perico during that meeting</p> <p>1/10 Eric Edwards NBH Ag Banking telcon</p> <p>1/17 Chris Nichols, Ryder update</p> <p>1/18 Mike ROZNOWSKI FRACTAL Advisors intro Black Lake Capital intro</p> <p>1/23 Dewey TURNER telcon</p> <p>2/26 Brandon Sowder Indoor cattle pen facility telcon Hart TX</p> <p>2/28 Bryan Sprinkman project review telcon</p> <p>4/26 Colby Arkin, NetSuite update</p> <p>Certain emails are blocked by a defendant UNITED STATES computer hack, calendar entries have been deleted by a defendant UNITED STATES computer hack</p>
--	--

640. RICO-2 Racketeering Violations: Theft and Takings - Financial Resources, Obstructing Market Rate Private Employment 1986 to Present

A. As forensically reverse engineered, defendants with police powers have and do hack and manipulate Lead Plaintiff's personal computer and the websites and/or spoofs of legitimate websites presented to Lead Plaintiff to engage in repeated blocking of access to legitimate personal employment opportunities, perpetuating involuntary servitude and forced labor from college graduation in 1977 forward through the present. Defendant UNITED STATES has and does repeatedly substitute its own fraudulent executive recruiters and insider network of defendant police powers, domestic and international intelligence agents, officers, and confidential informants, for both legitimate existing and to place imaginary non-existent positions, and do not permit the Lead Plaintiff to seek or engage in legitimate private employment. This fraudulent scheme, running from the Lead Plaintiff's first instance of a mailed application and resume, through his ownership of a personal computer beginning in the 1980s to the present, has and does use mail fraud, and since the 1980s, primarily uses wire frauds and

email frauds, in both in-state and interstate commerce, to sustain and perpetuate plaintiff involuntary servitude, forced labor, and to perpetuate systematic violations of the *First, Third, Fourth, Eighth, Ninth, Thirteenth, and Fourteenth* Amendments, and other civil, Constitutional, and human rights guaranteed under ratified international treaties including, without limitation, the 1972 *Bioweapons Treaty* and the 1992 *Torture Treaty*.

Interline Exhibits:	Not applicable
Complaint paragraphs:	414-534, 629 RGTS-9; 639-648 RICO-1-10 generally
Appendix 2 paragraphs:	1-007 through 1-010, 1-015, 1-017 through 1-023, 1-025, 1-031, 1-032
LPEE Table 2 pages 12023-12120 paragraphs:	Entirety of column entitled: Actions: Destroy Career, Businesses; Pretext, Entrap, Incriminate
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 8350-8355, 10259-10301, 10352-10363, 10376-10393, LPEEV65-6, 7
Emails and documents by topic and date, also located in LPEE:	CaseStack cutout Edwards Tracy 080625, IBM Circo DB Headhunter 1080717, LLoyd Staffing K Shipper DB Headhunter 110621, Paul Rainer IMS 080701, Personal Recruiter Connections Carnegieww Stricklin DB Headhunter 080625, Personal Recruiter Connections Circo 080716, Personal Recruiter Connections Kvederis 080716, Personal Recruiter Connections Circo 080725, Personal Recruiter Connections Rivera 080725, Personal Recruiter Connections Rowa 080801, Personal Recruiter Connections Sklenar 081021, Personal Recruiter Connections Gonzalez 110324, Personal Recruiter Connections Knox 110413, Personal Recruiter Connections Santorelli 110420, Personal Recruiter Connections McQuilkin 111015, Personal Recruiter Connections Lang 120726, Personal Recruiter Connections Melino 130213, Personal Recruiter Connections Andersen 140128, Personal Recruiter Connections DeNapoles 150210, Personal Recruiter Connections Weis 171019, Personal Recruiter Connections Pages 171205, Personal Recruiter Connections Nithin 180206, Personal Recruiter Connections Alcanzirin 181105,

	Personal Recruiter Connections Harte 190910, Personal Recruiter Connections Foster Peters 210518, Personal Recruiter Connections Olympia 210518, Personal Recruiter Connections Walsh 210518, Personal Recruiter Connections Foster Peters 210604, Personal Recruiter Connections Vasamshetti 220127
--	---

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

641. RICO-3 Racketeering Violations: Theft and Takings - Financial Resources, Thefts of Compensation PAN 1993-1994, CNA 2002, Establish 2008

A. 1993: PAN, CORNWELL, Ron WILLIAMS, as an employer promised and then denied compensation by using the fraudulent subterfuge of an accounts receivable factoring fraud, a loss of approximately \$65,000 to \$125,000 of compensation and theft of services (paragraphs 450-451, 519, 599D(i)c, 600, 601, 623, 627B, 639, 640, 644B(iv), 649F, 650B(ii), 652, 653, 683B(iv)).

B. 2002: CNA, defendant UNITED STATES' USMS cover company, which was ostensibly founded, managed, and owned by defendant FAUCI, (i) attempted to defraud Lead Plaintiff of a six-figure sum, paragraphs 471(i), 644 RICO-6), and did succeed in depriving him of the double damages and attorney's fees which would have awarded through a timely process before a King County Superior Court jury, through its protracted pattern of delays and attorney substitutions on this matter. These delaying tactics, abusing the King County Superior Court litigation process under state law through lies, evasions, misrepresentations, and legal maneuvers, such as the last minute withdrawal and replacement of counsel, and the series of other concurrent frauds, (ii) defendant FBI ShipNow check fraud (paragraphs 275(i), 471(ii), 650 RICO-12), and (iii) litigation expenses (ShipNow and CNA, paragraphs 471(ii), 644(v) RICO-6, CALDWELL, paragraphs 99c, 275(i), 320(f)(vi)), 683 RICO-45), combined with other fraudulent police powers color of law actions including, without limitation, (iv) defendants FBI and TSL commercial sales frauds (paragraph 673 RICO-35); which ran concurrently with (v) other hacking and the (vi) torture to suicide ideation process, paragraph 604 HEXP-1, all of which comprised simultaneous elements of defendant UNITED STATES' associated-in-fact enterprise racketeering acts, rights violations, and property rights wrecking process between 2002 and 2005, while defendant REICHERT was Sheriff of defendant KCSD, and which led to

the further human trafficking by defendant ROSENBERG in December 2005, to Boston, MA, with the assistance of SUMMERS, described at paragraph 463.

C. 2008: Defendant ESTABLISH sales commissions were not paid as due while Lead Plaintiff was employed in 2007 and 2008, despite the explicit and specific wording of the Lead Plaintiff's offer letter from ESTABLISH (paragraph 465 offer letter excerpt, LPEE pages 797-798). As forensically reverse engineered, this purposeful and deliberate fraud by defendant ESTABLISH and its key executive in the United States, defendant ROSENBERG (FBI). ROSENBERG (posing as Drumm) chose not to pay Lead Plaintiff these commissions timely, citing company cash flow issues, despite this sole US office being alleged wholly owned by a well-capitalized Swedish parent company, Establish, a four PL with global operations, with international consulting ostensibly run internationally by Haaken Andersen.

D. Defendants purposefully delayed the ESTABLISH commission payments until they had placed the Lead Plaintiff in a more financially vulnerable position after he was terminated in June 2008, and he lacked the financial resources to adequately defend his personal financial interests. ROSENBERG fraudulently leading ESTABLISH (FBI) company cash flow problems, then ROSS simply refusing to pay the full amount knowing the Lead Plaintiff's deliberately impoverished position which made litigation impossible. The actual sales commissions due by the time of Lead Plaintiff's June 2008 termination are approximately \$6,600. ESTABLISH also refused to pay the one month of termination pay agreed with the executive recruiter (nearly \$11,666) despite a verbal agreement at the time the offer was reviewed in a telephone call with Joe McKeon ("MRI" Executive Recruiter, Pittsburgh, PA, actually embedded FBI). According to the terminating manager, Conrad ROSS, the agreement to pay one month of severance was

not included in the company offer letter signed by ROSENBERG (William Drumm), and therefore was not due.

E. ESTABLISH provided \$700 to Lead Plaintiff and claimed this as full payment of all these claims, the proximate theft by a sequence of racketeering acts of approximately \$17,500 by defendant UNITED STATES (FBI, USMS) in this instance. The Lead Plaintiff lacked the funds to pay for legal services to litigate this matter and so was unable to legally pursue and collect the full amount of compensation due, legally permitted damages, and attorney's fees, which he would otherwise have received in a Court action and order.

F. These acts both reprise and repeat the compensation theft pattern also used by FBI at CNA in 2001-2002 in paragraph 644 RICO-6, and reprises, in alternate form, the SHIPNOW check fraud theft, paragraph 650 RICO-12. Further, this pattern of practice echoes the thefts by alternate means by defendant UNITED STATES which have been part of Lead Plaintiff's loss of quiet enjoyment and future value appreciation in the two residential improvements, which occurred by defendant UNITED STATES' design, in the two marital community destruction sequences in Redmond, WA and Kirkland, WA (paragraphs 425-470, Interline Exhibits 13, 14). Two subsequent residential improvements, followed closely by human trafficking events, in Cliffside Park, NJ, at paragraph 642 RICO-4, and Ramsey, NJ at paragraph 523, and have also deprived the Lead Plaintiff of quiet enjoyment of improvements made at personal expense, and not fully compensated by defendant UNITED STATES as actual landlord in its cover entity owned "safe" houses.

G. These schemes and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES'

involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; human medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content in searchable indexes and lists at LPEE Compendium at pages 934-1075. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	425-470, 523, 642, 650 RICO-4, 12; 639-648 RICO-1-10 generally
Appendix 2 paragraphs:	1-031, 1-032
LPEE Table 2 pages 12023-12120 paragraphs:	2-0094, 2-0129 through 2-0150
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al; pages 8351-8355, 10311-10364, LPEEV65-6, 7
Emails and documents by topic and date, also located in LPEE:	ESTABLISH Drumm post wedding 253pm 080630, ESTABLISH Meeks re closeout issues 080630, ESTABLISH ROSS re CWP stiff and closeout 080702, ESTABLISH ROSS re CWP stiff and closeout 080709, ESTABLISH ROSS Demand Ltr 080714, ESTABLISH Meeks New Ramsey Address Move in date 110331

642. RICO-4 Racketeering Violations: Theft and Takings - Financial Resources, Thefts of Labor And Materials, Cliffside Park Apartment Renovations 2008

A. After Lead Plaintiff was terminated from defendant ESTABLISH in June 2008, his Cliffside Park landlord (CHALOM, USMS) requested he renovate and improve his top floor apartment in Cliffside Park, NJ several months after he began collecting unemployment benefits (paragraph 472-474). To avoid losing his eligibility for unemployment payments (and being entrapped for collecting unemployment benefits while employed, which tradecraft pattern echoed the alleged AUSTIN double dipping allegations from his alleged lay-off at Boeing which arose while he worked at CNA), Lead Plaintiff agreed to accept the work as required by state law and stopped his unemployment compensation benefits while he worked on this project. When the project was completed, he presented defendant CHALOM the bill for equipment rental, tools, materials, supplies, and for his labor at \$17.00 per hour, a total of approximately \$16,000. Defendant CHALOM (USMS) then informed Lead Plaintiff that New Jersey law requires written contracts for all such agreements when the cost totals more than \$5,000. Lead Plaintiff was forced to settle for \$5,200, less than the amount of out of pocket costs he had incurred. He had continued his professional job search for alternate employment throughout this period and reapplied for resumption of unemployment compensation on completion of the project which cost all his labor and significant out-of-pocket, which exhausted his \$10,000 limit Bank of America credit card.

B. As forensically reverse engineered, as in similar prior sequences driven and orchestrated by defendant UNITED STATES and its co-conspirators, Lead Plaintiff was again placed in a very precarious financial position while unemployed, with no financial reserves after only ten months of employment in this fraudulent VP job at defendant ESTABLISH and prior homelessness, exactly where defendant UNITED STATES and its co-conspirators seek to keep

him as they have for years already – and will tomorrow and the next day – through the preparation of this Complaint.

C. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants’ long-running schemes, frauds, and swindles to sustain defendant UNITED STATES’ involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	472-474; 639-648 RICO-1-10 generally
Appendix 2 paragraphs:	1-032
LPEE Table 2 pages 12023-12120 paragraphs:	2-0141, 2-0157
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 10305-10307, LPEEV65-6, 7
Emails and documents by topic and date, also located in LPEE:	CHALOM re improvements billing 081229, CHALOM Final rent pymt 100913

643. RICO-5 Racketeering Violations: Theft and Takings - Financial Resources, Deprivation of Benefits, Kidnapping, and Involuntary Commitment 2008-2011

A. As a result of incurring renovation and improvement out-of-pocket expenses at Cliffside Park, NJ apartment, as related in paragraph 642 RICO-4, while his unemployment compensation had been suspended, by using his available credit to pay for the project costs and for daily food and other necessities, Lead Plaintiff's access to the credit he had reestablished in 2007 and 2008 was eliminated yet again, and his credit rating was again destroyed in this process. His \$10,000 Bank of America credit card was completely exhausted by advances to pay for the renovation project.

B. When he missed a payment on the credit card (likely actually issued by a defendant USMS or other federal defendant captive bank, not the actual Bank of America commonly used by the general public, LPEEV65-6, 7), while awaiting resumption of unemployment benefits, the credit card insurer (likely also a captive of federal defendants and which had removed funds by its premium charges) immediately cancelled his credit insurance before any claim could be made. The credit card then went into default as he was forced to choose eating and paying rent over making his credit card payment, all while waiting the further two weeks for unemployment compensation to be resumed.

C. In May and June 2010, Lead Plaintiff composed and filed a US District Court Complaint in Newark, NJ on June 23, 2010, naming USSS and FBI as lead defendants. Lead Plaintiff did not then remotely understand the full scope of the associated-in-fact enterprise and conspiracy, and presumed those parties may have been the primary perpetrators, and lacked the specific positive identifications which he has developed since beginning forensic analysis in mid-2021 and has been able to develop since September 2023, which served to highlight the full

scope of events, the related institutional defendants' operational tradecraft signatures, and facilitated specific positive identifications of individual defendants who clearly linked specific institutional defendants to specific acts, violations, and injuries.

D. The June 2010 federal court filing, docketed June 23 was swiftly followed in July 2010 by a certified letter from his landlord, defendant CHALOM (USMS), terminating his month to month apartment rental (paragraph 472-474). The Cliffside Park US Post Office did not allow him to collect this certified letter due to an alleged signature mismatch between the addressee name and his electronic signature at the point of collection, a clerk's workstation in the Post Office in July 2010, and no first class copy was sent, so the notice to vacate was never received.

E. Defendant CHALOM knocked at his apartment door on September 1, 2010 demanding he leave the premises. He overstayed his rental period to remain in his renovated Cliffside Park, NJ until October 1, 2010 when, with no financial resources or credit, he became homeless again. Duress, as a preferred method of fraudulent concealment was being reintroduced yet again by defendant UNITED STATES, with co-conspirators NJSP, BERGEN COUNTY, and BERGEN SHERIFF, as related below.

F. Lead Plaintiff took one rolling suitcase, donating his suits and most other clothing, leaving all other possessions – apartment furnishing, household equipment, and construction tools, behind. He boarded a New Jersey Transit bus to the Bergen County homeless shelter in Hackensack, NJ. Upon arrival, he was informed by BERGEN COUNTY shelter personnel that the shelter was full and was redirected by that person to the street address of an alleged nightly shelter a few blocks away. There was no shelter at that address, only older family residences on that street, and no such street address number between those residences.

G. Lead Plaintiff then walked to the Hackensack, NJ Police station and waited for about 20-30 minutes for a not particularly busy desk sergeant to respond. He was directed and walked to a South Hackensack, NJ motel about 2 miles away. One night in this low budget motel exhausted his remaining funds, and he called 911 in distress the morning of October 2, 2010. A South Hackensack Police officer and an ambulance responded. Lead Plaintiff was interviewed, loaded into the ambulance and, without explanation, transported to an unfamiliar hospital location (Bergen Regional Medical Center in Paramus, NJ), was briefly examined, and waited about 12 hours in the emergency room.

H. Unbeknownst to Lead Plaintiff, an emergency involuntary commitment hearing was allegedly held with no contact with either his appointed legal counsel before the hearing or with the Court at the time of the hearing. This alleged process actually constituted a kidnapping offense, as civil due process rights related to the involuntary commitment hearing, if one actually transpired, were systematically violated. These rights, which are unconditionally guaranteed to any subject of such a hearing under New Jersey statutes and case law *In Re R.S.*, 263 N.J. Super. 428, 432 (App. Div. 1993), are summarized below:

New Jersey courts have held that because of the important liberty interests in being free from unnecessary commitment, all procedural and substantive safeguards must be followed closely. (See *In re R.S.*, 263 N.J. Super. 428, 432 (App. Div. 1993)).

- You have the right to be present at your commitment hearing. (See NJSA § 30:4-27.14(b) and NJ R. 4:74-7(e)).
- You have the right to an attorney. (See NJSA § 30:4-27.12(d) and NJ R. 4:74-7(e)).
- You have the right to an in camera hearing, which means that there is not an audience. (See NJSA § 30:4-27.14(e)). However, you may request that your family attend and testify on your behalf at your hearing. (See NJSA § 30:4-27.13(c)).
- The decision of the judge must be supported by the testimony of a psychiatrist on your treatment team. (See NJ R. 4:74-7(e)).
- Other members of the treatment team may also testify at the hearing. (See NJSA § 30:4-27.13(b) and NJ R. 4:74-7(e)).
- You and your attorney have the right to present evidence and cross-examine witnesses. (See NJSA § 30:4-27.14 and NJ R. 4:74-7(e)).
- You have the right to testify at your hearing. (See NJ R. 4:74-7(e)).
- At the conclusion of the hearing, the judge will sign an order. (See NJSA § 30:4-27.15 and NJ R. 4:74-7(h)). This decision may order your discharge, order your continued involuntary, or convert your status to Conditional Extension Pending Placement (CEPP). The special legal status of CEPP is discussed here.

Source: Website_Involuntary_Patients_Legal-Rights_2.23.2021.pdf located at disabilityrightsny.org

The involuntary commitment in Bergen Regional Medical Center from October 2, 2010 to March 31, 2011 by these defendants violated the Lead Plaintiff's civil rights as follows:

- (i) It is presently unknown if there even was an actual court hearing on October 2, 2010, the day of the involuntary commitment, as Lead Plaintiff remained in the hospital emergency room for about 12 hours while a uniformed police officer was present outside his examining room whereupon, with no explanation, he was taken in a wheelchair with his meager belongings to a locked ward, where his belongings were searched and inventoried,
- (ii) Lead Plaintiff had no awareness of any court proceeding at any time, and was not present at the alleged hearing,

- (iii) The alleged legal representative was never in the presence of the Lead Plaintiff on the day of the alleged hearing,
- (iv) no evidence was allowed to be presented,
- (v) there was no cross-examination of anyone,
- (vi) there was no right to testify at the alleged hearing which Lead Plaintiff did not attend.

Lead Plaintiff was informed in a personal meeting with his alleged legal counsel about 5 days (around October 7, 2010) after the allegedly held hearing that he had been ordered involuntarily committed for 14 days.

I. A few days into this involuntary commitment, after refusing medication because the nurse would not tell him the names or the effects of the medications being administered orally, he was placed in a padded cell overnight and forcibly medicated by three large male orderlies with an injection in the buttocks. During this six month confinement period, he was transferred among various wards three or four times, experienced a violent indirect threat, experienced indirect physical violence, and a suicide trauma trigger attempt was perpetrated, had limited access to indoor exercise facilities intermittently and had virtually no outdoor access, which outdoor access consisted of a maximum of two minutes less than once each week as he walked from the main entrance to the behavioral facility entrance at the hospital. If in criminal confinement, this would constitute a clear violation of the *Eighth* Amendment prohibition on cruel and unusual punishment.

J. Since NJ state law states that a hospital may only release admitted patients to safe housing, and he had no access to housing or funds that he was then aware of, had been informed there were no shelter beds available upon this specific inquiry of the floor social worker Sinisi,

he “elected” to remain, and was unable to leave the locked psychiatric wards of his confinement until March 31, 2011, about six months later. In actual fact, rehousing was already immediately available through Advance Housing (Ramsey, NJ where he was eventually relocated on March 31, 2011) on the day he was admitted, had those confining him permitted him to access this housing.

K. As forensically reverse engineered, the “voluntary decision,” by the Lead Plaintiff to dismiss the federal civil rights litigation was made under extreme duress on December 15, 2010 while confined in the locked ward, and after a specific indirect threat of an indefinite civil confinement period in the hospital ward was described by an undercover officer who was posing as a patient on the ward, which furthered the stress of the direct and specific duress which had already and was continuing to be imposed throughout the entire sequence of defendants’ illegal police powers actions in their extreme violations of civil rights including, without limitation, multiple periods of extreme psychological and physical torture, which had begun in Washington state in 2002 (paragraphs 604-606 HEXP-1-3).

L. The District of New Jersey federal court took absolutely no action of any kind on the June 2010 *in forma pauperis* complaint, and the complaint was never served by USMS as required by law on any of the defendants. Once the federal court received the December 15, 2010 duress letter from the Lead Plaintiff, it then ordered the “voluntary” dismissal of the complaint on January 7, 2001. The rehousing process began very soon thereafter with an interview in late January or early February, then two overnight visits in February/March, and rehousing was completed on March 31, 2011, with a series of five interposed USMS minders posing as Advance Housing counselors thereafter.

M. These acts were perpetrated as further elements of the ongoing conspiracy which was and is an associated-in-fact enterprise pattern of racketeering acts including, without limitation, defendants' (i) intentional starve outs at various times and locations described herein, (ii) thefts of resources, (iii) psychological and physical torture, and (iv) deprivation of benefits under law including, without limitation, (a) the denial of shelter, (b) misdirection to a non-existent homeless shelter on October 1, 2010, and (c) the subsequent systematic denial of civil rights and civil due process rights in ordering, or allegedly ordering, without proper civil adjudication, this six month period of confinement of the Lead Plaintiff in Bergen Regional Medical Center, when rehousing resources (through Advance Housing in Ramsey, NJ where he was eventually relocated on March 30, 2011) had been vacant and available from at least the first day he was involuntarily committed to Bergen Regional Medical Center, so he could have been promptly rehoused within days, rather than months later, under the alleged court findings which led to his involuntary commitment (kidnapping and coerced confinement). Defendants, led by defendant UNITED STATES, in this on-going conspiracy against rights and long-running associated-in-fact enterprise pattern of racketeering acts, once again acted as, and are clearly shown to be, kidnapers and human traffickers of the Lead Plaintiff as their involuntary servant under duress, while they sustained their illegal abuse of the state's secrets privilege, among their other violations of rights and law.

N. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent,

to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	472-474, 642 RICO-4; 639-648 RICO-1-10 generally
Appendix 2 paragraphs:	1-032
LPEE Table 2 pages 12023-12120 paragraphs:	2-0141, 2-0157 through 2-0164
LPEE pages (see technical note on page numbering at paragraph 230):	10259-10301, 10305-10310, 10311-10364, 10434-10444, LPEEV65-6, 7
Emails and documents by topic and date, also located in LPEE:	Bergen Regional Sinisi re resume and cover ltr 101230

644. RICO-6 Racketeering Violations: Theft and Takings - Financial Resources, Forced Labor Imposed Litigation Expenses 1993-2022

A. As forensically reverse engineered, defendant UNITED STATES has used a variety of disguised methods to perpetuate involuntary servitude in forced labor including, without limitation, the imposition of litigation expenses, in violation of 18 U.S.C. § 1589(3),

B. Litigation, including compromises of funds legally due and legal expenses and fees, as imposed by defendant UNITED STATES in violation of 18 U.S.C. § 1589(3), was also required to attempt recovery of stolen and/or promised funds and compensation in both personal matters and in closely held commercial enterprises, all while engaged in interstate commerce and, in some case, on federally funded projects:

- (i) 1990: Alliance for a stolen project account receivable payment of approximately \$165,000, ostensibly to Steve's Maintenance from the Bates Vocational-Technical Institute project in Tacoma, WA, with eventual recovery of about \$82,000, a loss of \$83,000, plus legal fees paid;
- (ii) 1993: Forced personal bankruptcy litigation expenses resulting from the deliberate fraudulent financing by CORNWELL, Shearing, Wozow (acting through Pacific Financial Services, Bellevue, WA, paragraph 448);
- (iii) 1993: LaserAccess (formerly LazerSoft when run by Lead Plaintiff) for recovery of \$40,000 of post-merger sales bonuses awarded in 1989 with an eventual recovery of \$22,000 coming from defendant Stephen M. WATERS rather than the entity itself, a loss of \$18,000 plus legal fees paid;
- (iv) 1993: PAN, CORNWELL, Ron WILLIAMS, as an employer promised and then denied compensation by using the fraudulent subterfuge of accounts receivable factoring fraud, a loss of approximately \$65,000 to \$125,000;
- (v) 1994: Forced to pay \$2,200 of legal fees after leaving P.A.N. Environmental Services (PAN) by a supposed freelancer seeking payment for an unpaid PAN bill for services which had to be defended to avoid a default judgment;

- (vi) 2003-2004: CNA Industrial Engineering, another six-figure compensation theft where there was no valid legal basis for the arguments being presented and legal maneuvering including a change of attorneys and failures to comply with court deadlines used to delay the matter while starving the Lead Plaintiff's financial resources (as he was working unwittingly with PRAY as fraudulently embedded defendant UNITED STATES co-owner of Allegent, LLC, and in 2004 had engaged defendant CALDWELL fraudulently misrepresenting herself as a Seed & Berry intellectual property attorney to pursue the ShipNow intellectual property matter for Allegent), so as to avoid the double damages (approximately \$250,000 of compensation if fully recovered) and attorney's fees recovery allowed under Washington state law for this kind of compensation theft (see LPEE pages 10467-10527), while costing \$37,000 in legal fees out of pocket,
- (vii) 2004: Allegent, LLC dba Performa, for \$82,000 of bad checks passed to Performa by a customer, actually a defendant FBI entity ShipNow (see LPEE pages 10445-10471),
- (viii) 2019: defendant DEAN T. SMITH (UNITED STATES, FBI) filed litigation in the Eastern District of California (19-cv-01918, which see on Pacer.gov) which further extended Lead Plaintiff's involuntary servitude and functionally destroyed the interstate commerce startup Winnett Perico, Inc. (Winnett), and its subsidiaries. The federal court case filed lacked a sound legal basis for the claims made and was based on false representations with virtually no due diligence prior to filing by attorney Evers, all in furtherance of defendant UNITED STATES and co-conspirators associated-in-fact enterprise pattern of racketeering acts and its on-going violations of, without limitation, 18 U.S.C. § 1589(3), forced labor, abuse of legal process (paragraph 626 RGTS-6). The

Smith v. Winnett/Brewer et al case in 19-cv-01918 was voluntarily dismissed without prejudice in April 2021, so it effectively continues to hang over the Lead Plaintiff despite the false original premise for the claims being made in the Complaint and is clear abuse of the legal process by defendant UNITED STATES, FBI, DEAN T. SMITH. See Interline Exhibits 6, 11, LPEE pages 140 et al, 8472-8473, 9601-9604, 9610-9611, 9788-9790, 9925, 9926, 9997, 10004.

C. This forced litigation abuse pattern of racketeering acts by defendants is part of a very broad scope and long running pattern of defendants prior and continuing bad faith acts toward Lead Plaintiff and enterprises he has and does own or control in interstate commerce, which include thefts by various means, including, without limitation, uncollectible and disputed accounts receivable, bad checks, compensation theft, and related litigation recounted at paragraphs 629 RGTS-9, 640-645, 650, 655, 680-693 RICO-2 through RICO-7, RICO-12, RICO-17, RICO-42 through RICO-54. This series of “legal” techniques, used by defendant UNITED STATES and its officers, agents, and confidential informants, abuses the legal system to induce delay, expense, and mental and financial stress, while “dirtying up” the Lead Plaintiff as it does for other similarly situated plaintiffs.

D. Defendant FBI also deprived Lead Plaintiff’s private enterprise of both (i) access to private investors through its co-ownership of Alliance, and (ii) of SBA government benefits to small businesses, for which Alliance qualified under SBA’s contractor bonding program as FBI defrauded Alliance and Lead Plaintiff in 1990-1993 as (a) it destroyed the company, and (b) placed Lead Plaintiff in personal bankruptcy, using (c) a fraudulent cross-border financing through CORNWELL (CIA, paragraph 652 RICO-14). All these acts, violations, and injuries occurred while the Lead Plaintiff was under the unwitting coercive control and duress imposed

by his human traffickers, defendant UNITED STATES including, without limitation, FBI, CIA, ARMY, BURNS, ROSENBERG, in circumstances not reflecting the full market value of the Lead Plaintiff's professional services, as he was then and still an involuntary servant from 1968. These amounts are not adjusted for inflation or interest due, nor for consequential damages including, without limitation, the loss of other professional and entrepreneurial opportunities, the repeated loss of real property and financial assets, and appreciation of those assets over time due to interest compounding and real property appreciation.

E. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as

well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	6, 11
Complaint paragraphs:	626 RGTS-6, 629 RGTS-9, 640-645, 650, 655, 680-693 RICO-2 through RICO-7, RICO-12, RICO-17, RICO-42 through RICO-54, 652 RICO-14; 639-648 RICO-1-10 generally
Appendix 2 paragraphs:	
LPEE Table 2 pages 12023-12120 paragraphs:	2-0001, 2-0047, 2-0056, 2-0057, 2-0110, 2-0111, 2-0113, 2-0114, 2-0134, 2-0185, 2-0186
LPEE pages (see technical note on page numbering at paragraph 230):	A. 140 et al, 8472-8473, 9601-9604, 9610-9611, 9788-9790, 9925, 9926, 9997, 10004 B(v) 10445-10471 B(vi) 10467-10527
Emails and documents by topic and date, also located in LPEE:	COSTCO GC reply to verification request 211102, D Brewer reply to DOJ OIG decline ltr 220325 Performa (Allegent dba) v ShipNow 220818 040210.pdf 040713 Allegent ShipNow Confirmation of Joinder 040713.pdf 040713 Allegent ShipNow Dismissal With Prejudice 040713.pdf 040713 Brewer Allegent ShipNow Docket Sheet 040713.pdf 040713 Brewer ShipNow Amended Complaint 040713.pdf 040713 Brewer ShipNow Disclosure 040713.pdf 040713 Brewer ShipNow Notice of Appearance 040713.pdf 10445-10467 030122 Brewer CNA Brewer Counsel LARSON 030122.pdf 030122 Brewer CNA CNA Motion for Summary Judgment 030122.pdf 030122 Brewer CNA Decl Amount Due etc 030122.pdf 10468-10527 030122 Brewer CNA Docket Sheet 030122.pdf 030122 Brewer CNA Plaintiff Brewer Ans 030122.pdf 030122 Brewer CNA Summons and Complaint 030122.pdf Smith 100K Check 1of2 150730.pdf Smith 100K Check 2of2 150730.pdf Smith 100K Subscription Agreement SKMBT_C36415072911310 DB Signed 150729.pdf Smith Litigation Halt Proposal to resume company operations 200106.pdf Smith Litigation SULLIVAN Winnett - WCC Letter Respond to Evers-DSmith 190621.pdf

	Smith Litigation SULLIVAN Winnett - WCC Letter to Evers - Dean Smith III 190723.pdf Smith Litigation Winnett - WCC Letter Responding to Evers - Dean Smith II 190710.pdf Smith Note 5K 190201.pdf Smith Loan pays CORNHUSKER Retainer 10125 Smith \$30K Loan 10157 Smith \$5K loan 10164 Smith Paid COSTCO Trip Hotel Reservation 10165-10171 Evers Ltr to R. SULLIVAN 160925.pdf
--	--

645. RICO-7 Racketeering Violations: Theft and Takings - Financial Resources, Shadow Banking System Thefts And Manipulations

A. As forensically reverse engineered, during the late 1980s into the 1990s, as debit cards came into widespread use, defendant UNITED STATES spoofed Washington Mutual Bank and orchestrated a cascade of thousands of dollars of insufficient funds charges against Lead Plaintiff's DDA checking account by imposing a minimum \$25 transaction amount to his DDA account each time he used his debit card, even when the actual transaction was much less. This cost the Lead Plaintiff in the vicinity of \$5,000 for insufficient funds charges over several years at a time when his non-market compensation as an involuntary servant to the UNITED STATES at LazerSoft was in the range of \$40,000 per year and zero at Alliance after 4-6 months at about \$65,000 per year. This is part of a pattern of similar acts, violations, and injuries by defendant UNITED STATES directed at Lead Plaintiff and others similarly situated.

B. Defendant UNITED STATES' control of Lead Plaintiff's finances was demonstrated yet again by their hacking of the ACH system, or their complete control of Lead Plaintiff's financial life through use of a completely controlled financial system in their hack or their contrivance to appear as a hack. An \$8 ACH payment to CapitalOne from Lead Plaintiff's personal checking account failed as a result of their hack or some other fraudulent contrivance of

defendants and resulted in a \$20 late fee. A recent BRMT hijacking of Lead Plaintiff resulted in a cascade of late fees on a Taz Visa credit card sequence.

C. Defendant UNITED STATES has and does routinely impound Lead Plaintiff's funds and credit availability using double-billing and overbilling for goods and services, as well as order fulfillment shortages, delivery of wrongly sized items, and hacked electronic devices requiring returns to the vendor, to frustrate rights, to constrain available financial resources, and to limit financial flexibility and the ability of Lead Plaintiff to travel, entertain, and purchase goods and services at certain times (paragraph 646 RICO-8, and in evidence blocked by defendant UNITED STATES related to a 2020 trip to New Orleans, LA with defendant GIA, paragraph 613 HEXP-10). This complements defendants' outright illegal conversions to the benefit of themselves or to others by alternate means including, without limitation, contrived employment and unemployment, business losses, destroyed marital communities, alternate form thefts and seizures of real and personal property, thefts of financial assets, and imposed expenses documented throughout the RICO series of offenses and injuries herein.

D. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets

privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953).

Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	613 HEXP-10, 646 RICO-8; 639-648 RICO-1-10 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0047, 2-0054, 2-0115, 2-0202, 2-0207
LPEE pages (see technical note on page numbering at paragraph 230):	609-612, LPEEV65-6, 7
Emails and documents by topic and date, also located in LPEE:	Not applicable

Racketeering – Personal Color of Law Entrapments

646. RICO-8 Racketeering Violations: Theft and Takings - Credit and Credit Access Hacks

A. As forensically reverse engineered, defendant UNITED STATES’ control of Lead Plaintiff’s finances has been demonstrated repeatedly in its continuing control of his credit and credit access. Defendants have and do routinely impound Lead Plaintiff’s funds and credit availability using:

- (i) posting delays when crediting available funds,
- (ii) double billing to reduce available credit,
- (ii) hacking to prevent credit availability online.

These illegal manipulations have and do constrain available financial resources and limit financial flexibility and the ability of Lead Plaintiff to travel, entertain, and purchase goods and services at certain times.

B. These particular credit and collections accounts frauds and swindles are an element of defendants' broader scheme to use uncollected credit card account balances as part of a scheme to generate some sort of tax liability which could be coordinated with other entrapment attempts including, without limitation, paragraphs 647-648 RICO-9, 10. Non-payment of these collection accounts by Lead Plaintiff would lead to taxable income from unpaid debts. This specific entrapment combination of unpaid collection accounts, with the \$6,000 cash loans from MAGGARD (FBI), and any forced or voluntary default such as would occur if Lead Plaintiff did not make an annual interest payment on the \$6,000 loan from MAGGARD (FBI), which combination could then be used in an effort to render the Lead Plaintiff guilty of tax fraud for failure to declare income resulting from these debt extinguishments.

C. Lead Plaintiff could then be deprived of certain federal government benefits including, without limitation, the Section 8 housing voucher he must use to maintain stable housing. This would again limit his ability to pursue litigation against these defendants, just as they were able to accomplish by imposing extreme duress on Lead Plaintiff soon after his June 23, 2010 filing in Newark federal district court when they rendered him homeless and orchestrated the involuntary commitment related at paragraphs 512-522. This entire complex scheme in 2023 arose in the months after the Lead Plaintiff mentioned such a scheme to the US Attorney for the Southern District of New York in a hand delivered letter on July 18, 2022 (LPEE pages 542-544).

D. This sequence of events, pattern of practice, and its application in this timeframe, all demonstrate defendants including, without limitation, defendant FBI's clear awareness of their own past pattern of corrupted practice in their operation of their associated-in-fact enterprise pattern of racketeering acts, continued surveillance of all Lead Plaintiff's activities and systematic rights violations, and confirm defendants' long-running patterns of fraudulent concealment, racketeering acts, *mens rea*, and consciousness of guilt.

E. This was another step in an evolving complex financial entrapment scheme primarily perpetrated by defendant UNITED STATES (FBI, USMS, CIA) which extends to other subsequently dated RICO counts herein at paragraphs 647-648 RICO-9, 10.

F. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at

paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	512-522, 647-648 RICO-9, 10; 639-648 RICO-1-10 generally
Appendix 2 paragraphs:	1-067
LPEE Table 2 pages 12023-12120 paragraphs:	2-0047, 2-0054, 2-0055, 2-0056, 2-0068, 2-0122, 2-0195
LPEE pages (see technical note on page numbering at paragraph 230):	542-547, 10256-10258, 11708-11726
Emails and documents by topic and date, also located in LPEE:	Not applicable

647. *RICO-9 Racketeering Violations: Illegal Searches, Hacking, and Harassing– Tax Software Hack EITC Entrapment Attempt 2021, 2022*

A. As forensically reverse engineered, defendant UNITED STATES’ control of Lead Plaintiff’s finances was demonstrated yet again by their hacking of TurboTax tax filing software so that it requires earned income to complete the filing (LPEEV65-12). Normally, a Social Security recipient with no taxable income could file without the need to add any taxable income to their filing. Lead Plaintiff worked around this hack by reporting \$1 of earned income for 2021 and 2022 so the tax returns could be filed timely. There was no resultant problem from this method of filing in 2021. In 2022, this same filing technique generated an EITC check from the State of New Jersey, which defendant FBI (UNITED STATES) clearly intended would not be returned to the State of New Jersey as required by law (since there was no actual earned income). Lead Plaintiff returned the EITC check with a note to the NJ state tax investigators, see LPEE pages 11704-11707.

B. This was another step in an evolving complex financial entrapment scheme primarily perpetrated by defendant UNITED STATES (FBI, USMS, CIA) which subsequently extended to RICO-10. This is the next step in a series of recent transparent attempts in 2021-2023 by defendant FBI (UNITED STATES) to entrap for improper receipt of EITC refund, which would then cause the loss of Lead Plaintiff's federally funded, state administered Section 8 housing voucher rent subsidy and force displacement of the Lead Plaintiff from his current Edgewater, NJ apartment. This pattern of practice is completely consistent with these police powers defendants' long running pattern of practice which has included prior losses of residence and related personal property to and including homelessness (involuntary servitude and forced labor).

C. This Section 8 voucher loss would have the practical effect of making civil rights litigation over this fraudulently concealed illegal program of BRMT, rights, and racketeering acts, violations, and injuries practically impossible, as these defendants have done in imposing duress to complement other methods of fraudulent concealment in the past including, without limitation, in December 2005 (within 120 days following a FTCA complaint letter) and October 2010 (within 100 days following a federal district court at Newark complaint).

D. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated

herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	13, 14
Complaint paragraphs:	639-648 RICO-1-10 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	Not applicable
LPEE pages (see technical note on page numbering at paragraph 230):	11704-11707, LPEEV65-9, 12
Emails and documents by topic and date, also located in LPEE:	Not applicable

648. RICO-10 Racketeering Violations: SOLE SOURCE Fraudulent Financing with Ironwood Tax Loss Self-Exculpatory Offset Attempt 2018-2023

A. As forensically reverse engineered, Lead Plaintiff sent a series of email solicitations in 2018 sourced from a list in a Los Angeles Times business news article, now known as likely a fraudulent planted story on a spoofed LA Times website, seeking business financing. SOLE SOURCE Capital responded and introduced Dewey TURNER, a principal, from this defendant FBI cover operation actually run from Manhattan, New York. A few weeks later, TURNER and three other agents, one known as Bradford ROSSI, ostensibly visiting from Los Angeles,

requested a meeting the afternoon of January 9, 2018 on very short notice at the St. Regis Hotel bar in New York City. ROSSI, as the senior most executive at SOLE SOURCE, verbally promised a multi-million dollar financing at that meeting. SOLE SOURCE, acting through emails and a January 23, 2018 phone call from Dewey TURNER, then reneged to the Lead Plaintiff's company in 2018 (see paragraph 337). This was part of the pattern of fraudulent financing commitments which have become evident to Lead Plaintiff over time with the benefit of forensic reverse engineering from mid-2021. It is an element of defendant UNITED STATES' pattern of involuntary servitude racketeering acts which has and does continue from the 1970s forward to this day.

B. TURNER mentioned a visit to an operation in west Texas in one of his calls to Lead Plaintiff sometime in the following months (paragraph 624 RGTS-4). In searching for a CFO to support the originally promised financing or a replacement financing, Lead Plaintiff had also come across CFO SEARCH, a specialized senior financial officer executive search firm with a "partner" who did or does work from a residential address in Lubbock, Texas. The partner, known as Michael MAGGARD, located a CFO, an Egyptian national working in the United States, for Sheldon Beef, but company financing, originally promised by SOLE SOURCE had been withdrawn as above. and a search for other financing was still underway (never to be completed due to on-going interferences with interstate commerce by police powers defendants and their on-going pattern of involuntary servitude, illegal BRMT abuses, rights violations, and racketeering acts, violations, and injuries). See paragraph 624 RGTS-4.

C. At the time, Lead Plaintiff had not connected these defendant FBI dots between SOLE SOURCE and the search firm CFO SEARCH, despite TURNER's prior phone hint as related by his casual mention of a trip to a potential company investment prospect in West Texas. (This is

now known from forensic analysis and evaluation of direct prior experiences reviewed in that analysis as an common tradecraft practice used by defendant FBI for in-process operational security checks and is therefore also useful as a breadcrumb for forensic backtracking of their operations by Lead Plaintiff.) The CFO SEARCH partner, defendant Michael MAGGARD, an FBI agent assigned to the Amarillo field office, had coordinated this overall operation with New York field office agent known as principal Dewey TURNER, SOLE SOURCE. This is a step in an evolving complex financial entrapment scheme primarily perpetrated by defendant UNITED STATES (FBI, USMS, CIA) which extends to other subsequently dated RICO counts herein.

D. MAGGARD then loaned \$6,000 to Lead Plaintiff's company Gannett Peak Ranch (GPR, Inc., incorporated in Oregon) for web development, and another \$6,000 to Lead Plaintiff personally which was used to try to improve his credit score by lowering credit utilization and payment defaults, so Lead Plaintiff would be able to co-sign for a six figure loan for Gannett Peak Ranch. As previously experienced, this good faith interstate commerce Gannett Peak Ranch project also went wrong - the web site was never completed by ENVOTEC (almost completed, saying they just needed a little more time and money, yet again as with other prior software projects). Nonetheless, the \$6,000 personal loan was still due from Lead Plaintiff to MAGGARD, the \$6,000 business loan was still due, and there was no offsetting revenue or income. This is a virtually identical repeat of the pattern of racketeering act frauds experienced repeatedly in other interstate commerce private business projects since Sheldon-Lee Associates in 1984 with THORPE through this 2022 project with MAGGARD as perpetrated by defendant UNITED STATES and its co-conspirators. See paragraph 650 RICO-12.

E. Defendant UNITED STATES then cooked up a new entrapment scheme to get this \$6,000 loan off defendant FBI records. A release form for a Whistler, British Columbia, Canada

condo relinquished to Lead Plaintiff's second spouse in their 2005 divorce mysteriously showed up beginning in February 2023 in the approximate amount of \$6,000 a nearly perfect offset for the \$6,000 MAGGARD personal loan (if defaulted) for tax purposes.

F. The email sent by the alleged condo association representative requesting the release stated there were no underlying records which support this timeshare on either the condo association or the British Columbia timeshare interest register (Ironwood, LPEEV65-9). While a British Columbia notary firm was used the release, this was a transparent attempt to secure a loan default against defendant FBI agency funds by FBI. Defendant FBI would then hold this matter open looking for another offense to add, or until the statute of limitations and/or internal record keeping requirements had run their course, so this fraudulent loan record is lost to the evidence destruction cycle related to closed "investigations," thus disappearing the direct evidence of defendant FBI's own direct repeated direct interference in the Lead Plaintiff's financial affairs and business in interstate commerce, effectively another attempt to transfer its culpability for its own participation in this associated-in-fact enterprise pattern of racketeering acts to the Lead Plaintiff. See LPEE page 11641 where Lead Plaintiff explicitly was finally able to connect this illicit defendant FBI train of events.

G. This was another step in an evolving complex financial entrapment scheme primarily perpetrated by defendant UNITED STATES (FBI, USMS, CIA) which extended through other previously dated RICO counts herein. Defendant UNITED STATES has a long history of these patterns of practices, including scofflaw conduct and repeated evidence destruction cycles using human trafficking, technical hacks, check fraud, among other illegal techniques in bad faith acts against Lead Plaintiff and his business efforts in interstate commerce (at all paragraphs in this Complaint).

H. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	337, 624 RGTS-4, 650 RICO-12; 639-648 RICO-1-10 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	Not applicable
LPEE pages (see technical note on page numbering at paragraph 230):	11641, LPEEV65-8
Emails and documents by topic and date, also located in LPEE:	MAGGARD TX re ABDELSAYED 200722, MAGGARD TX re ABDELSAYED start date 200817,

	<p> MAGGARD TX status 210115, MAGGARD re Korea Angus pgm etc 210118, MAGGARD re 26 Ranch and ABDELSAYED 210221, MAGGARD on ABDELSAYED positive connect 210222, MAGGARD re ABDELSAYED 210302, MAGGARD re ABDELSAYED to Egypt 210304, MAGGARD on loan docs PFS need 210306, MAGGARD re gty and PFS 210307, MAGGARD re Big Sandy BAFO 210322, MAGGARD re Big Sandy reprise 210505, MAGGARD re investors and Big Sandy 210519, MAGGARD re Lake County LOI 210701, MAGGARD re Lake County 210702, MAGGARD re 500k loan 210703, MAGGARD enroute Lake County 210707, MAGGARD re Lake County enroute 210707, MAGGARD re Lake Copunty tour and plus minus issues 210709, MAGGARD re Lake County and pers FICo improvement 210715, MAGGARD re Lake County 210719, MAGGARD Loan to DB improving FICO 210721, MAGGARD re Lake County 3559 LOI 210721, MAGGARD on Lake County Fin snags 210725, MAGGARD on WMT Wagyu comp price and other status 210804, MAGGARD re startup sequencing plan 210816, MAGGARD re status web dev sales 210816, MAGGARD re add subs WEFUNDER 210817, MAGGARD re GAAP fin need 210818, MAGGARD re mkt gap 210818, MAGGARD 5k GPR loan 210826, MAGGARD re 4500 loan recvd 210826, MAGGARD Revised GPR Startup Plan 210830, MAGGARD re DB overadvance 210901, MAGGARD re loan not pursued 210903, MAGGARD re 26k loan 210909, MAGGARD re ICPO LOI-FM-LZ-210913, MAGGARD re Terminating Trader efforts 210916, MAGGARD re status 211104, MAGGARD re 700 211221, SOLE SOURCE cold email hit 171219, SOLE SOURCE feedback 171222, SOLE SOURCE call 171226, SOLE SOURCE NDA Double D feedyard 171227, SOLE SOURCE TURNER phenom news HEC etc 180105, </p>
--	---

	SOLE SOURCE TX feedyard options 180105, SOLE SOURCE TURNER mtg invite StRegis NYC 180108, SOLE SOURCE TURNER re NYC mtg 180108, SOLE SOURCE mtg fup NYC 180109, SOLE SOURCE mtg in NYC 180109, (see also LPEE page 1074V entry 1/9/2018) SOLE SOURCE TURNER at mtg StRegis 180109, SOLE SOURCE mtg results to NICKLESS 180110, SOLE SOURCE 180111, SOLE SOURCE update TX 180119, SOLE SOURCE 180121, SOLE SOURCE Check by outsider 180122, SOLE SOURCE re WMT China added opptntys 180123, SOLE SOURCE on string out 180125, SOLE SOURCE hold cmu to Gearn 180126, SOLE SOURCE repeat decline 180228, SOLE SOURCE TURNER on Big Sandy 210507, SOLE SOURCE TURNER on feed price sensitivity 210601, TURNER on Feedyards and Deloitte Earnings review 180111, TURNER re TX feedyards status 180121,
--	---

Racketeering – Targeting Small Business And Enterprise

649. RICO-11 Racketeering Violations: Deprivation Of SBA Government Bonding Benefits, UT Bonding Fraud 1990-1993

A. As forensically reverse engineered, as part of defendant UNITED STATES’ intentional financial wrecking of Lead Plaintiff’s company Alliance, which incorporated (i) fraudulent co-ownership and control through a nominee (David J. Carey as nominee, FBI, paragraphs 445-449, 649 RICO-11), (ii) fraudulent legal representation (HIBBS and Susan THORBROGGER, DOJ/FBI, both embedded at Short Cressman Burgess law firm, paragraphs 446; 626 RGTS-6, 649, 651, 653, 683 RICO-11, 13, 15, 45), (iii) fraudulent deprivation of government benefits (SBA bonding, paragraph 446, 471; 649, 653 RICO-11, 15), (iv) theft and compromise of receivables (Steve and Kerry Brewer, FBI, paragraphs 644, 650, 651 RICO-6,

12, 13), was then succeeded by (v) a Vancouver, B.C. fraudulent financing which failed (paragraph 653 RICO-15).

B. 1990-1993: As forensically reverse engineered, defendant UNITED STATES deprived Alliance, Lead Plaintiff's environmental services company, of legally guaranteed access to Small Business Administration (SBA) bid and performance bonding and loan guarantees ordinarily available to small businesses through SBA by interposing a defendant FBI agent as the supposed SBA representative during and after Alliance's acquisition of the assets of Steve's Maintenance in March 1990. Steve's Maintenance was in fact an FBI cover company which FBI was intent on financially wrecking on Lead Plaintiff, both (i) to conceal evidence of its own illegal acts during general searches of businesses in the asbestos abatement and other environmental services in western Washington, and (ii) to further CIA/ARMY continued development of the illegal BRMT bioweapon through continued illegal human medical experimentation on the unwitting Lead Plaintiff, and his new spouse Jeanette (married March 1990).

C. 1992: Alliance was awarded the asbestos abatement subcontract for the Sea-Tac Airport B, C, D Concourse expansion project by the general contractor on this federally funded project. Defendant FBI then orchestrated a two to three month delay of contract start, deferred submittal of structural steel building plans and orders so other work would not start, and then abrupt acceleration of asbestos abatement work. The malicious project delay then resulted in a greatly increased weekly payroll requirement for 80 people instead of 20 people with 45 day cash flow cycle from billing to project payment from the general contractor on the Sea-Tac Airport project. The Lead Plaintiff contacted the Utah based insurance company which had furnished the performance bond to request a temporary working capital loan, only to learn the

Utah based insurance company had been seized by the Utah Insurance Commissioner. In fact, the company had actually been seized prior to FBI's fraudulent use of the company's building and offices by two FBI agents in the otherwise empty two or three story building about two blocks west of the abruptly rising Wasatch Mountains in or around Provo, UT, during the Lead Plaintiff's visit there to secure initial bonding coverage. FBI then fraudulently issued the performance bond on the seized insurance company's bonding form.

D. 1993: Denial of SBA bonding and its continuous withholding thereafter, as well as disruption of all other efforts to secure authentic bonding services cost Alliance millions in lost revenue over the three years it was able to operate, including at least \$1.2 million in 1993 as the winning subcontractor on the FAA Air Route Traffic Control Center renovation project in Auburn, WA to a Kirkland, WA general contractor it had already worked for very successfully on the renovation and expansion of Snoqualmie High School, Snoqualmie, WA in late 1990-1991.

E. 1990-1993: The entire sequence was the plan and conspiracy of defendant FBI with defendants BURNS, CIA, and ARMY (Jeanette, secretly active duty coerced ARMY soldier, was the fraudulently orchestrated spouse as arranged by BURNS, CIA during this period) used to intentionally exacerbate Alliance company cash flow problems, which cash flow problems had resulted from defendants' earlier illegal deprivation of SBA benefits in its fraudulent earlier denial of bonding, deliberate overstaffing just before acquisition close, attempted detrimental modification of purchase and sale contract terms, and deliberate overstaffing just prior to transaction close, then theft of \$80,00 in forced compromise in the first 90 days of operation, all of which had dramatically reduced company revenue and profit from other projects to that point to financially weaken the company. G. The SBA bonding denial fraud by FBI in 1990 was the

critical proximate cause of the financial failure of Alliance in mid-1993 and, together with defendants FBI and CIA cross-border financing frauds (paragraph 623 RGTS-3), was also the proximate cause of the Lead Plaintiff's subsequent federal bankruptcy related filed in November 1993.

F. Alliance's individual projects were generally profitable with 30% to 35% gross margins, the persistent lack of revenue created by lack of bonding capacity meant that overhead salaries and expenses were not able to funded adequately. Lead Plaintiff worked without compensation from late Summer 1990 until the company was closed in 1993, then continued without compensation at PAN due to on-going FBI and CIA illegal racketeering acts, as described at paragraphs 450-453, 601 NSEC-2, 623 RGTS-3, 653 RICO-15.

G. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who

presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	445-449, 450-453, 471, 601 NSEC-2; 623, 626 RGTS-3, 6; 644, 649, 650, 651, 653, 683 RICO-6, 11, 12, 13, 15, 45
Appendix 2 paragraphs:	1-017
LPEE Table 2 pages 12023-12120 paragraphs:	2-0052
LPEE pages (see technical note on page numbering at paragraph 230):	Not applicable
Emails and documents by topic and date, also located in LPEE:	Not applicable

650. RICO-12 Racketeering Violations: Theft of Receivables, Check Frauds 1990 to present

A. As forensically reverse engineered, defendant UNITED STATES has and does conspire with other defendants, both named and not yet identified, without limitation, as it (i) plans and conducts thefts of property by various alternate means (paragraphs 490-516, Interline Exhibits 13, 14), (ii) evades and/or totally avoids payments of legally due accounts receivable in its cover company operations, and (iii) purveys fraudulent unfunded bank checks to Lead Plaintiff and to his in-state and interstate commercial businesses. Defendants have and do systematically conspire and act to (iv) deprive Lead Plaintiff of personal and business financial resources, (v) force litigation for recovery or partial recovery of assets and sums due, (vi) force arbitration to compromise amounts due, and (vii) engage in outright theft, including passing bad checks, as they perpetrate these frauds.

B. These check, mail, and wire frauds have been and are used by defendant UNITED STATES (principally defendants FBI, CIA, ARMY, USMS) to control Lead Plaintiff in

perpetual involuntary servitude and forced labor from majority age in what are supposedly the Lead Plaintiff's private enterprises owned and controlled by him, and while he has and does act and operate in "manager investor," "member" and/or "partner," roles. Co-investor, member, and partner roles have been persistently and surreptitiously filled by preselected undercover agents, officers, informants, and periodically by members of the media, as part of defendants' conspiracy, typically driven by defendant UNITED STATES, which has and does place its own and other police powers officers, agents, and confidential informants in these positions by systematically screening out all other options including in, without limitation, each and every one of Lead Plaintiff's numerous attempts from 1983 (Sheldon-Lee Associates, with THORPE, CIA, paragraphs 428, 563) to engage in untrammelled interstate commerce and commerce on federally funded projects in various entrepreneurial businesses, to wit:

- (i) 1990, Alliance for a stolen project account receivable payment of approximately \$165,000, ostensibly to Steve's Maintenance from the Bates Vocational-Technical Institute project in Tacoma, WA, with eventual recovery of about \$82,000, a loss of \$83,000, plus legal fees paid (paragraphs 445, 446),
- (ii) 1993, PAN, CORNWELL, Ron WILLIAMS, (UNITED STATES, FBI, CIA) as an employer PAN promised and then denied compensation by using the fraudulent subterfuge of accounts receivable factoring fraud, a loss of approximately \$65,000 to \$125,000 (paragraph 448, US Bankruptcy Court filing November 1993, Western Washington, Dennis and Jeanette Brewer),
- (iii) 2004, Allegent, LLC dba Performa for \$82,000 of bad checks passed to Performa by a customer, actually a defendant insider entity ShipNow (paragraphs 461, 462, 471(ii), 516, LPEE pages 10445-10471),

- (iv) 2004, Allegent, LLC, engaged CALDWELL (DOJ), while she fraudulently posed as an intellectual property attorney at Seed & Berry to pursue the ShipNow intellectual property matter for Allegent, while starving the Lead Plaintiff's LLC of financial resources, as Lead Plaintiff was working unwittingly with PRAY (UNITED STATES, USMS or FBI) as co-owner while accruing legal fees paid by Allegent to Seed & Berry (paragraphs 219, 275(i), 276, 320f(iv), 461, 462, 471(ii), 516), and,
- (v) 2019, defendant DEAN T. SMITH (UNITED STATES, FBI) filed litigation in the Eastern District of California (19-cv-01918, which see on Pacer.gov). The *Smith v. Winnett/Brewer* et al case in 19-cv-01918 was eventually voluntarily dismissed without prejudice in April 2021, is a clear abuse of the legal process by defendant UNITED STATES, FBI, DEAN T. SMITH (paragraphs 477, 626 RGTS-6, 658 RICO-20, Interline Exhibits 6, 11, LPEE pages 140 et al, 8472-8473, 9601-9604, 9610-9611, 9788-9790, 9925, 9926, 9997, 10004).

D. Defendant UNITED STATES and its co-conspirators have never allowed any enterprise Lead Plaintiff has attempted to run to actually operate without disruption since co-opting Sheldon-Lee Associates with partner and co-investor THORPE (defendant CIA) in 1983. Nor have defendants UNITED STATES and its co-conspirators allowed any further employment by the Lead Plaintiff since September 2002 except the human trafficked from imposed homelessness in Boston, MA 10 months of fraudulent employment in 2007-2008 at ESTABLISH by ROSENBERG and ROSS.

E. Lead Plaintiff has been illegally human trafficked in involuntary servitude since 1968, and has been and is subject at all times from 1979 to the present, to involuntary servitude and forced labor while being human trafficked to various assigned employment "options" and to

immediate arbitrary termination on whim as determined by defendant UNITED STATES and co-conspirator defendants for their convenience. He was forced to accept the compensation the defendants indirectly specified using mail fraud, wire fraud, and their internal illegal intelligence operations and enterprises, as he was unable to access any authentic private employment opportunities, and his businesses have been and are repeatedly defrauded to failure using various means, including deprivation of SBA loans, guarantees, and bonding, and access to private investor financing and/or public investor markets.

F. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as

well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	6, 11
Complaint paragraphs:	219, 275(i), 276, 320f(iv), 428, 445, 446, 448, 461, 462, 471(ii), 477, 490-516, 563, 626 RGTS-6, 650, 658 RICO-11, 20
Appendix 2 paragraphs:	1-017
LPEE Table 2 pages 12023-12120 paragraphs:	2-0047, 2-0054, 2-0056, 2-0057, 2-0061, 2-0081, 2-0106, 2-0110, 2-0111, 2-0113, 2-0114, 2-0115, 2-0150
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 566, 8291-8293, 8351-8352, 10445-10506
Emails and documents by topic and date, also located in LPEE:	Currently blocked by defendant UNITED STATES

Racketeering - Fraudulent Financings

651. RICO-13 Racketeering Violations: Money Laundering - Alliance Nominee Cash Bank Deposit 1990

A. As forensically reverse engineered, as part of defendant UNITED STATES' intentional financial wrecking of Lead Plaintiff's company Alliance, which incorporated (i) fraudulent co-ownership and control through a nominee (David J. Carey as nominee, FBI, paragraphs 445-449, 649 RICO-11), (ii) fraudulent legal representation (HIBBS and Susan THORBROGGER, DOJ/FBI, both embedded at Short Cressman Burgess law firm, paragraphs 446; 626 RGTS-6, 649, 651, 653, 683 RICO-11, 13, 15, 45), (iii) fraudulent deprivation of government benefits (SBA bonding, paragraph 446, 471; 649, 653 RICO-11, 15), (iv) theft and compromise of receivables (Steve and Kerry Brewer, FBI, paragraphs 644, 650, 651 RICO-6, 12, 13), was then succeeded by (v) a Vancouver, B.C. fraudulent financing which failed (paragraph 653 RICO-15).

B. 1990: As forensically reverse engineered, defendant UNITED STATES made an approximately \$80,000 cash bank deposit at a U.S. Bank, N.A. branch on 14th Street NW,

Auburn, WA in the middle of 1990, a few months after Lead Plaintiff purchased the assets of Steve's Maintenance. The physical cash deposit was made by Kerry Brewer (defendant FBI, no relation to Lead Plaintiff) using a paper barrel bag typically used for groceries, in the presence of Lead Plaintiff to an account supposedly intended to provide a cash deposit for the purpose of securing bid and performance bonding from a third party bonding company. Since the deposit exceeded the \$10,000 limit which then required a written disclosure to IRS, Lead Plaintiff signed the required IRS form for the cash deposit.

C. The funds were deposited in an account under the signatory control of Kerry Brewer, not Lead Plaintiff. The funds were removed the following day by Kerry Brewer. An in-person IRS inquiry which followed weeks later at the company's office was answered by Lead Plaintiff. No further IRS follow-up occurred. This was most probably an attempt by defendant FBI to attract the attention and interest of IRS.

D. This cash deposit was intended by Lead Plaintiff to partially replace Alliance's lack of SBA bonding (defendant FBI fraud in deprivation of government benefits, paragraph 649 RICO-11) through use of a private bonding company, so the company could regain required bonding capacity essential to bidding larger projects and thereby growing sales revenue and profits on its 30% to 35% gross margin business. Lead Plaintiff also intended the cash deposit would, by increasing future revenues, partially replace defendant FBI's theft of receivables from the Bates Vocational-Technical School project, which Steve and Kerry Brewer had undertaken to remove \$165,000 of Alliance company cash flow (defendant did cut the cash receipts by around \$80,000 in a "compromise" of the actual amount legally due to Alliance from that Bates Vocational-Technical School project, in another of defendant FBI's series of attempts to (a) accelerate the

demise of Alliance (paragraph 650 RICO-12) and (b) to destroy the Steve's Maintenance records which evidenced prior illegal general searches conducted by FBI through this cover company.

E. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	445-449, 471, 626 RGTS-6, 644, 649, 650, 651, 653, 683 RICO-6, 11, 12, 13, 15, 45; 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	1-017
LPEE Table 2 pages 12023-12120 paragraphs:	Not applicable

LPEE pages (see technical note on page numbering at paragraph 230):	Not applicable
Emails and documents by topic and date, also located in LPEE:	Not applicable

652. *RICO-14 Racketeering Violations: Factoring Frauds – Pacific Financial Services 1992-1993, PAN Environmental Services 1993-1994*

A. As forensically reverse engineered, Alliance won the subcontract to M.A. Mortenson for asbestos abatement on the federally funded Sea-Tac Airport Concourse BCD expansion project. Typically the first contractor on site, Alliance's start date was deliberately delayed by defendant FBI as part of its program of involuntary servitude and control of Lead Plaintiff and its planned destruction of the records of its illegal search and surveillance operations in the environmental services industry in western Washington, during which it had used cover company Steve's Maintenance, whose assets and records had been purchased by Lead Plaintiff's company, Alliance, which had FBI as a secret investor using a former Rainier National Bank SVP as the straw investment conduit (David J. Carey, former SVP Commercial Lending - Rainier National Bank).

B. The Sea-Tac Airport project late start led to a dramatic acceleration of the asbestos abatement schedule to meet the overall project schedule. The company's 12-20 person crew had to be expanded to about 80 people practically overnight, severely straining cash flow due to the need to meet a much greater weekly payroll expense without sufficient cash reserves prior to the 45 day payment of project progress invoices by the general contractor. As FBI orchestrated this delay and acceleration of asbestos abatement work on the Sea-Tac Airport Concourse expansion project, the Lead Plaintiff contacted the performance bonding company to request financial

assistance, only to learn the Utah based insurance company had been seized by the Utah Insurance Commissioner.

C. In fact, the company had actually been seized prior to FBI's fraudulent use of the company's building and offices by two FBI agents in the otherwise empty two or three story building about two blocks west of the abruptly rising Wasatch Mountains in or around Provo, UT during the Lead Plaintiff's visit there to secure initial bonding coverage, which FBI then fraudulently issued on the seized company's bonding form.

D. The Lead Plaintiff then sought an expensive form of contract financing known as factoring, with typical effective interest payment in the 70% to 90% per annum range. Pacific Financial Services took over the payroll function but failed to pay employment taxes, attempting to lay this back on Lead Plaintiff (paragraph 448). An IRS agent visited Lead Plaintiff at home during his recovery from DVT which arose after a financing trip to London for PAN, who described the turnover to Pacific Financial Services of all payroll responsibilities early in the course of the accelerated project.

E. With the benefit of forensic reverse engineering and based upon pattern of practice, defendant FBI's clear intent was the financial wrecking of the company after it was sold into private hands (David Carey, "co-owner and investor," was then former Rainier National Bank SVP used by FBI as the intermediary for its investment of agency funds), for the purpose of destroying the evidence of their illegal surveillance of the environmental services businesses in western Washington, and to entangle Lead Plaintiff in liability for unpaid federal 941 payroll taxes.

F. When this fraudulent financing eventually failed in Vancouver, BC, Canada, the \$20,000 factoring loan turned in a few months into a loan default totaling \$65,000 which Lead

Plaintiff had personally guaranteed, and then into personal federal bankruptcy in November 1993 filing for Lead Plaintiff and his second wife Jeanette. Lead Plaintiff was working on a financing at PAN when his wife Jeanette informed him that Pacific Financial Services had secured a court order against community property which was being used to garnish her wages for this \$65,000 defaulted loan.

G. Soon after the fraudulent Vancouver VSE related financing (CORNWELL, BURNS, CIA, and FBI) failed and the PFS factoring loan then caused Lead Plaintiff's personal bankruptcy, FBI and CIA (CORNWELL, Ron Williams) ran a similar pattern of racketeering acts in southern California against Lead Plaintiff by allegedly factoring a large Pacific Remediation Services (PAN subsidiary) account receivable to a southern California factoring company, which factoring proceeds were then to be used to make catch salary payments to Lead Plaintiff who was working without compensation, The factoring loan never transpired, the contract payment funds were allegedly placed in First Interstate Bank to cover a loan to the factoring company by First Interstate Bank and no effort was made by CORNWELL or PAN to legally claim the funds as required under California law.

H. As forensically reverse engineered, this was actually merely a gratuitously cruel fraud on Lead Plaintiff, mocking the prior fraudulent and forced bankruptcy, as the factor operation and the receivable were a completely fabricated operation with no actual proceeds to factor and no authentic factoring company involved. Lead Plaintiff never received any compensation for his work PAN during 1993-1994 – a compensation fraud on the Lead Plaintiff is the forensically reverse engineered clear and transparent purpose of this associated-in-fact enterprise pattern of racketeering acts. Defendant ROSENBERG (FBI) then trafficked Lead Plaintiff to Pacific

Pipeline’s Board of Directors as the PAN racketeering acts and conspiracy was being wound down.

I. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants’ long-running schemes, frauds, and swindles to sustain defendant UNITED STATES’ involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	448; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	1-017
LPEE Table 2 pages 12023-12120 paragraphs:	2-0055
LPEE pages (see technical note on page numbering at paragraph 230):	Not applicable

Emails and documents by topic and date, also located in LPEE:	Not applicable
---	----------------

653. *RICO-15 Racketeering Violations: Fraudulent Financial Services – Ex-CIA Northern Africa Case Officer 1992-1995 Alliance*

A. 1992-1993: As forensically reverse engineered, as part of defendant UNITED STATES’ intentional financial wrecking of Lead Plaintiff’s company Alliance, which incorporated (i) fraudulent co-ownership and control through a nominee (David J. Carey as nominee, FBI, paragraphs 445-449, 649 RICO-11), (ii) fraudulent legal representation (HIBBS and Susan THORBROGGER, DOJ/FBI, both embedded at Short Cressman Burgess law firm, paragraphs 446; 626 RGTS-6, 649, 651, 653, 683 RICO-11, 13, 15, 45), (iii) fraudulent deprivation of government benefits (SBA bonding, paragraph 446, 471; 649, 653 RICO-11, 15), (iv) theft and compromise of receivables (Steve and Kerry Brewer, FBI, paragraphs 644, 650, 651 RICO-6, 12, 13), was then succeeded by (v) a Vancouver, B.C. fraudulent financing which failed (paragraph 653 RICO-15).

B. This sequence of fraudulent financing acts by defendant UNITED STATES which led to zero dollars of company financing but did require considerable time and expense by Lead Plaintiff and his company, Alliance, was initiated in 1992 by an alleged financial services broker, Gerald CORNWELL (formerly a commercial cover CIA officer who operated from Pasco, WA in northern Africa as proprietor of a center pivot irrigation installation company), claiming much needed investment funding was available from a “known reliable source” in Vancouver, B.C., Canada.

C. CORNWELL (former commercial cover CIA agent in north Africa) and FBI worked, unknown to Lead Plaintiff, with RCMP, Ralph Shearing (who ostensibly ran a Canadian mining geophysical sampling company based in Vancouver, BC, Canada), and Rory Godinho (barrister

in the Vancouver, BC area), and CSIS, John Young (international mining financier and mining engineer), to develop this fraudulent Vancouver, BC financing package through Shearing, which required a financial audit.

D. CPA reviewed financial statements for Alliance were required to obtain this alleged multi-million dollar financing. To accomplish this task, financial statement compilation was contracted to the “sister” of a former Deloitte Seattle co-worker of Lead Plaintiff, Phil Walter. This “sister” (UNITED STATES, most probably FBI), then walked away after several weeks of work, leaving the financial statement compilation incomplete after being paid for work to date. This led to protracted delays in financial statement preparation as the Lead Plaintiff was forced to spend days straightening out her mess instead of bidding projects to sustain Alliance’s critically important sales and cash flow. The financial statement review process was then further dragged out by the local “accountants,” a local firm which was actually another illegal cover spying operation (defendant FBI). This sequence caused weeks of delay and cost the company thousands of dollars out of pocket for accounting services.

E. When this fraudulent financing eventually failed in Vancouver, BC, Canada, the \$20,000 factoring loan from Pacific Financial Services, Bellevue, WA (a fraudulent factoring company run by Henry Wozow, probably FBI) was used to cover the financing fees, audit fees, and expenses. turned in a few months into a loan default totaling \$65,000 which Lead Plaintiff had personally guaranteed, and then into personal federal bankruptcy in December 1993 for Lead Plaintiff and his fraudulently orchestrated second wife Jeanette (defendant ARMY, active duty, coerced using deferred prosecution threat for sexual orientation within national security sphere of military regulations).

F. Alliance, which already lacked the SBA bid and performance bonding it was legally entitled to access as a small business (paragraph 649 RICO-11), was starved out of existence due to the lack of bonding, lack of financing, and the abrupt acceleration of the federally funded Sea-Tac International Airport B, C, D Concourse expansion project, (paragraph 652 RICO-14) which further exacerbated its cash flow problems and resultant cash flow from projects. This accomplished the dual purposes of (i) Lead Plaintiff's perpetuated involuntary servitude in the illegal BRMT bioweapon and bioweapon delivery system, rights violations, and associated-in-fact racketeering enterprise of the UNITED STATES, and (ii) resulted in the destruction of Steve's Maintenance and records of that illegal cover company, which had previously been illegally used in criminal investigations in the asbestos abatement marketplace in Washington state, in continued knowing violation of the *Fourth* Amendment by defendant UNITED STATES.

G. 1993-1994: CORNWELL (former CIA) later became CEO of P.A.N. Environmental Services (PAN), a SEC pink sheet company, which in 1994 also deprived Lead Plaintiff of compensation due through yet another fraudulent factoring fraud. This particular episode of the pattern of racketeering acts occurred while defendant UNITED STATES, unbeknownst to Lead Plaintiff, was using PAN as a platform for a cross border investigation of financial frauds involving US persons and the Vancouver Stock Exchange, its brokers, agents, and others, while entangling the unwitting Lead Plaintiff further into this international investigation, a theme defendant UNITED STATES (FBI, USMS, CIA) has and does use repeatedly (among other still worse patterns of acts at other subcounts) to deliberately ensnare, entangle, and attempt to entrap Lead Plaintiff in national security matters due to the lack of recourse for these color of law abuse criminal conspiracies against rights (18 U.S.C. § 241) by defendant UNITED STATES.

H. Lead Plaintiff searched for new employment in mid-1993 as Alliance operations were terminated as the company was forced to close. During this period, CORNWELL (a former Navy carrier pilot turned deep cover CIA agent who had worked espionage operations in north Africa before retiring), now posed as having formed a new venture, as CEO of an environmental services company, PAN, by using a publicly traded shell corporation to work toward securing a form of financing known as a PIPE (private investment in public equity), which allowed private funds to be invested in public stock, which in turn was to be listed on NASDAQ to provide investor liquidity without the need to go through the SEC registration process. CORNWELL promised Lead Plaintiff compensation as soon as a financing with Credit Lyonnaise Laing (CLL), a major French investment bank and stock broking firm with offices in London, was completed, so Lead Plaintiff agreed. He had no knowledge that he remained the effective captive and involuntary servant of defendant UNITED STATES (CIA, ARMY, FBI, USMS), and its continuing BRMT, rights, and racketeering conspiracy.

I. The promised CLL financing, actually simply an effort to engage MI-6 (Kurtanek, CLL as his international Managing Director commercial cover for mining projects in Africa and elsewhere), MI-5 (UK's FBI equivalent), and the London Metropolitan Police (which included a five man Counterterror squad trot-by while he was alone in a 500 foot long construction tunnel at Heathrow Airport, and a hotel bill on his Copthorne Tara, Kensington, hotel room number which remained unpaid by CORNWELL for a time being sufficient to attract the attention of their Serious Fraud squad) with the Lead Plaintiff for technical surveillance (yet again, see the national security event Queen Elizabeth II's 1983 visit to Seattle, Queen Elizabeth II's 1983 visit to Seattle at paragraphs 211, 600 NSEC-1, 623B RGTS-3, 679B RICO-41 for a prior example) failed in Spring 1994. CORNWELL and FBI also ran a \$165,000 fraudulent factoring theft on a

Pacific Environmental Services (the P. in P.A.N.) sub-soil remediation or paving project during this sequence in 1994, echoing the prior \$20,000 factoring loan which had been used for the fraudulent Canadian financing, \$65,000 loan default, and forced bankruptcy closed out just four or five months before. Lead Plaintiff never received the compensation due for his work at PAN (paragraphs 450-453, 601 NSEC-2, 623 RGTS-3).

Interline Exhibits:	Not applicable
Complaint paragraphs:	211, 445-449, 450-453, 471; 600, 601 NSEC-1, 2; 623, 626 RGTS-3, 6; 644, 649, 651, 652, 653, 679B. 683 RICO-6, 11, 13, 14, 15, 41, 45; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	1-017
LPEE Table 2 pages 12023-12120 paragraphs:	2-0053 through 2-0055
LPEE pages (see technical note on page numbering at paragraph 230):	1 et al, 11-139, 140 et al, 383, 398, 420, 463, 566, 767-768
Emails and documents by topic and date, also located in LPEE:	Not applicable

J. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626

RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

654. *RICO-16 Racketeering Violations: Fraudulent Financial Services – Ex-CIA Latin America Case Officer 2013-2015*

A. Charles JACKSON, (who has been represented by defendant Ray SULLIVAN as deceased since around December 2014) was a former Merrill Lynch Mexico City investment banker (CIA commercial cover, Latin America), was paid \$750 from Lead Plaintiff's personal funds and contracted by Winnett, owned by Lead Plaintiff, for investment banking services. These services were fraudulently provided in bad faith with numerous discussions and emails including fraudulent progress reports of investor interest over several used to create the appearance of progress, fraudulently freeze the Lead Plaintiff from engaging services, and perpetuate the involuntary servitude of Lead Plaintiff beginning in March 2013 (paragraphs 543, 661D, 684A RICO-23, 46). In September 2014, Lead Plaintiff expended an additional \$700 of personal funds (loaned by JACKSON and repaid to his supposed widow after his alleged death) for travel to a Phoenix, AZ area investor development meeting with JACKSON, his supposed spouse Gail (identified as former Attorney General Janet Reno in April 2024 photo identification by Lead Plaintiff and the sister of Charles), and John Tyler, Cherry Creek Partners, a supposed major investor, as well as to tour potential organic farming sites with Jack Doughty, Three Rivers Ag, a real estate broker.

B. JACKSON's alleged investor and lender interactions and interests described and discussed with Lead Plaintiff during this period during this period included Prudential Agricultural Lenders; Prince Zayid Mohammed, a Middle Eastern investor; Skye Root, WGIM agriculture investment advisory firm for TIAA-CREF; an elderly Mississippi investor, Jack Burstein, a Florida investor; Lawrence Financial; John Tyler, Cherry Creek Partners; RABO VanDeGraaf (actually the then recently returned CIA Moscow station chief); Sherbrooke Capital; Byron Lekulvich, Resource Land Holdings, Colorado Springs, CO, among others. All elements of this fraud and swindle were completely fraudulent representations made by JACKSON and others herein both in person and using emails and phone calls. No investment funds were raised nor intended to be raised in this fraudulent deprivation of honest services. Defendants DOJ and CIA intended this solely as internal security backcheck and to defraud the Lead Plaintiff in interstate commerce by depriving him of those rights to sustain involuntary servitude as human subject of illegal biomedical experiments without consent service of the illegal BRMT bioweapon and bioweapon delivery system and to determine their own security of senior government officials who had operated in and as executives of those defendants in this associated-in-fact racketeering enterprise and conspiracy against rights.

C. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated

herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953).

Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4 through 14
Complaint paragraphs:	543, 661D, 684A RICO-23, 46; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0171
LPEE pages (see technical note on page numbering at paragraph 230):	383-384, 431, 440, 8370-8373, 8378, 8411, 9902, 9905, 9923, LPEEV65-6, 7
Emails and documents by topic and date, also located in LPEE:	Charles JACKSON Resume 130311.pdf JACKSON Contract 140207.pdf JACKSON Initial Contact 130311, JACKSON ibanker deal agreed 130809, JACKSON retainer pymt 130903, JACKSON fee from BA personal acct130926.pdf JACKSON re BLACKPOOL Term Sheet and BP fail 131015, JACKSON intro to SULLIVAN 131125, JACKSON re Alberts Organics as customer 140114, JACKSON investor status inquiry 140115, JACKSON re new cust 2 3 140115, JACKSON reply on investor questions 140128, JACKSON Hurwitz on 25MM loan 140206, JACKSON Hurwitz verbal Relay 140206, JACKSON Pru Ag REED Mitchell referral 140207, JACKSON REED Mitch Pru Ag Loans self intro 140207,

	<p> JACKSON on Alberts contract update 140218, JACKSON re 140226 SULLIVAN mtg Ramsey 140219, JACKSON re SULLIVAN face mtg 140219, JACKSON Domeier Prudential Ag referral 140224, JACKSON re Zayid alleged investment 140303, JACKSON re Attorney retainer wire on Zayid deal 140304, JACKSON re Zayid Attny Retainer Xfr 140304, JACKSON re Burstein call FL 140307, JACKSON re Sherbrooke Capital 140404, JACKSON connects Skye Root 140407, JACKSON re circular referral to Resource Land Byron Lekulvich 140627, JACKSON re Tyler 140629, JACKSON re Tyler Eager to Raise 200MM 140701, JACKSON Contract 140707, JACKSON re 55% MS investor 140827, JACKSON on 3 London closings 140902, JACKSON re 3 London Closings 140902, JACKSON re Tyler Doughty Maricopa County mtg 140909, JACKSON Maricopa County Visit Details 140917, JACKSON re PHX trip 141101 Tyler mtg 140917, JACKSON re personal BofA acct number 141015, JACKSON VanDeGraaf likely Maricopa Rabo poser 141024, JACKSON 700 for Maricopa trip 141027, JACKSON VanDeGraaf likely Maricopa Rabo poser 141027, JACKSON re Burstein Miami update 141204, JACKSON re Burstein mtg and Hain 141210, JACKSON re Hain Celestial interest 141210, JACKSON Gail on Charles Death 150209, JACKSON Tyler re PPM review by SULLIVAN 150806, Westchester Mgmt Skye Root re farm acq parameters 140407 Zayid 20MM Cancelled Signed Subscription Agreement Cancelled 121002.pdf Zayid Signed JV Agreement121022.pdf </p>
--	--

655. RICO-17 Racketeering Violations: Fraudulent Financings and Loans - NYC Broker/Investor 2011-2017

A. Defendant Jonathan CROSS (UNITED STATES, FBI), represented himself as an officer or principal of various entities using the various defendant entities sharing the names

BLACKPOOL and SHEFFORD, while acting as a defendant agent, officer, and as a part of this on-going conspiracy (paragraph 692B RICO-54). CROSS represented his firms, these various BLACKPOOL and SHEFFORD entities legally named in the caption of this Complaint, as capable of and sincerely interested in securing financing on behalf of Lead Plaintiff's entities, thereby conspiring with and playing an on-going role from approximately 2011 to 2017 in a complex evolving sales, production, operations, and financing scheme to deprive Lead Plaintiff and his related entities of investment and authentic opportunities to engage in interstate commerce.

B. CROSS proposed various fraudulent financings, bridge loans, held imaginary Investment Committee meetings, traveled to Las Vegas on February 8, 2017, and caused the Lead Plaintiff to do so as well, while misrepresenting himself as having TIAA-CREF as a co-investor interested in investments in the tens of millions of dollars in Winnett entities owned and controlled by Lead Plaintiff as the parties toured Stockton Hill Farm north of Kingman, AZ with VOLK (FBI). Lead Plaintiff also negotiated with Robert Saul, representing Barings, the institutional investor manager/owner, for the 16,000 acre irrigated Stockton Hill Farm acquisition, as he was being assisted in preparation of purchase proposals by Bill REED (FBI Tucson). He was introduced to James Rhodes, a Las Vegas real estate developer being investigated for bank fraud by defendant FBI (introduction by Steve POINDEXTER, FBI) who owned Kingman Farms (first together with and then as a farm which was split from Barings' Stockton Hill Farm) during the course of this sequence of defendant FBI fraudulent interferences in interstate commerce. Robert Saul later appeared again in this defendant FBI scheme as a Massachusetts-based member of the Fiera Comox team, a Montreal, Quebec, Canada

institutional investor, where Lead Plaintiff held investment discussions by email and phone with another team member in the series of fraudulent financings led by defendant FBI.

C. This overall pattern is yet another in the decades-long sequences of FBI institutional racketeering acts interferences in interstate commerce across multiple field offices (most probably Phoenix, Tucson, Las Vegas, Manhattan, and/or Miami), to sustain illegal BRMT development, rights, and racketeering acts, violations, and injuries against Lead Plaintiff. This pattern of practice is representative of the type and manner of acts, injuries, and violations against this class of plaintiffs by defendant UNITED STATES in its broad institutional pattern of violations of constitutional rights, primarily by DOJ, its police powers operations, ARMY, other military services operating contrary to posse comitatus legal constraints on operations against US persons, and CIA/ARMY illegal development and deployment of the illegal and internationally BRMT bioweapon and bioweapon delivery system.

D. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626

RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4 through 14
Complaint paragraphs:	692B RICO-54; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0039, 2-0047, 2-0053, 2-0054, 2-0059, 2-0171, 2-0173, 2-0179
LPEE pages (see technical note on page numbering at paragraph 230):	8454-8467, 8939-8955, 9053-9059, 10138-10156, 10528-10565, 10566-10613, LPEEV65-6, 7
Emails and documents by topic and date, also located in LPEE:	BLACKPOOL First Hit 110815, BLACKPOOL IC Approval 120919, BLACKPOOL decl Podzemny to Dalhart Realty130201, BLACKPOOL CROSS early hook 140120, BLACKPOOL Persists Example 150707, BLACKPOOL IC Approval 150821, BLACKPOOL on PHX trip 150825, BLACKPOOL Persists Example 151103, BLACKPOOL merge annemnt 161101, BLACKPOOL PPM process 161122, BLACKPOOL IMM Bridge Loan Contract 161129, BLACKPOOL WF wire advice 161130, BLACKPOOL Term Sheet proposal email Smith PETERSEN 170126, BLACKPOOL re TIAA-CREF (Skye Root JACKSON tieback poss) 170131, BLACKPOOL email Term Sheet Signed 170201, BLACKPOOL re other investors rejected 170201, BLACKPOOL tour Stckton Hill Farm LV realtor contact 170202, BLACKPOOL re Stckton Hill Broadway VOLK connection 170203, BLACKPOOL Stockton Hill tpour fup 170210, BLACKPOOL Stockton Hill dataroom access 170213, BLACKPOOL Stockton Hill offer status 170214, BLACKPOOL SAUL Barings Stockton Hill LOI 170215,

	BLACKPOOL Stockton Hills Farm Tour Final Logistics 170217, BLACKPOOL re Stockton Hill SAUL Barings LOI response 170221, BLACKPOOL re delay 170225, BLACKPOOL xmit detail financial info 170227, BLACKPOOL re investment to date 170228, BLACKPOOL to fund fup 170301, BLACKPOOL re SAUL Barings Deadline Stockton Hill 170303, BLACKPOOL stringout 60MM financing 170303, BLACKPOOL Cmte Mtg 170307, BLACKPOOL re possible loss Stockton Hill Farm 170307, BLACKPOOL more questions string out 170308, BLACKPOOL stringout 60MM financing 170308, BLACKPOOL recvs CFO Smith resume during IC mtg 170308, BLACKPOOL re DB personal bkgnd 170310, BLACKPOOL re former counsel Seattle 170310, BLACKPOOL to request firm commit on 60MM 170310, DD Callahan (KEENE) on BLACKPOOL funding 170202, DD Callahan (KEENE) re BLACKPOOL Term Sheet 170202, DD Callahan (KEENE) update BLACKPOOL 170227
--	---

656. *RICO-18 Racketeering Violations: BRMT Assisted Check Fraud Entrapment Attempt – Top US Financial Institution 2014-2015*

A. In June 2015, defendant FBI executed a complex interstate and international funding fraud across five weeks which FBI had first set up in May 2014 (first contact). A \$10 million financing commitment was made by email. This fraud and swindle used the illegal BRMT bioweapon and bioweapon delivery system and check fraud to cause fraudulent checks to be deposited in the Winnett corporate account by mailing a check to the Lead Plaintiff (\$9,826 as deposited) and by an agent of defendant UNITED STATES (unknown FBI, Manhattan) who used the Lead Plaintiff's identity and live automated teller assistance at an ATM in New York City (\$26,430 as deposited). Lead Plaintiff transferred \$9,125 to a third party. Both deposits

from two different parties are dishonored, and the business account was overdrafted by \$9,118, as a result of the \$9,125 wire transfer to the third party above. The Ramsey, NJ Bank of America branch where these accounts were serviced was closed for the day as Lead Plaintiff received this emailed notice of dishonor, so he called Bank of America's customer service line. He was unable to reach live customer assistance despite several long periods on hold. This inability to reach a responsive customer service agent was a new experience which later became quite familiar to the Lead Plaintiff over the next 15 years into 2022. Similar property theft abuses just under the \$10,000 reporting limit which also constitute racketeering acts in deprivation of property rights by defendant UNITED STATES include paragraphs 610I HEXP-7, 661 RICO-23, 830D, 831G, and an international \$5,000 reporting limit at paragraph 665.

B. Lead Plaintiff received a check drawn on a Canadian company and addressed to him personally around this same time, deposited this check and received an overdraft notice mailed on July 7, 2015 for \$180,000 against his personal account several days later.

C. These Bank of America accounts were closed by the "bank" (most probably controlled by an FBI embed, or less likely SECRET SERVICE, LPEEV65-6, 7) soon thereafter. The Ramsey, NJ branch refused to accept a cashier's check made out to Bank of America from Wells Fargo, forcing the Lead Plaintiff to transport about \$9,200 in cash between the two bank's branches in Ramsey, NJ to pay off the overdraft and fees on the closed account (the requirement to use cash sustained untraceability/concealment of evidence of this FBI perpetrated crime sequence which was just under the \$10,000 disclosure limit).

D. Bank of America (actually a shadow version controlled by defendant UNITED STATES, LPEEV65-6, 7) then closed both accounts. Since these accounts were opened immediately after Lead Plaintiff was human trafficked by ROSENBERG to ESTABLISH, Fort

Lee, NJ, the first practical effect was to conceal and later destroy evidence of (i) the fraudulent employment at ESTABLISH and related compensation theft (ROSENBERG, ROSS, FBI, USMS); (ii) the fraudulent relationship with MODDERMAN; and (iii) related costs and expenses, and theft of labor, materials, and project overhead for Cliffside Park, NJ apartment renovations by CHALOM (USMS); (iv) the human trafficking sequence incorporating the Newark federal District Court filing, loss of residence less than 120 days later (initiated by CHALOM); (v) involuntary commitment in Paramus, NJ hospital, (vi) subsequent trafficking, after Lead Plaintiff's "voluntary" dismissal of the Newark federal case under duress and coercion, to Ramsey, NJ; and (vii) the privations related thereto between August 2007 and August 2015. The "bank" telephone legal department representative later informed Lead Plaintiff, the bank would not preserve banking records as required by his evidence preservation letter (LPEEV65-7) sent to the bank address as it was not a named defendant in the litigation, and Lead Plaintiff had no online access to retrieve these records.

E. The second practical effect was defendant UNITED STATES' use of an illegal BRMT bioweapon and bioweapon delivery system brain hijacking to manipulate Lead Plaintiff's mental process to high trust (which is totally consistent with his life experience throughout his childhood within the highly ethical Quaker sect religious group he was raised in) for this sequence of judgement errors he rarely made otherwise, as a test of illegal BRMT brain hijacking progress, which was then repeated with Laura Akoto using this same method and adding illegal BRMT bioweapon and bioweapon delivery system hijacking of oxytocin, at paragraph 612 HEXP-9.

F. This sequence of defendant UNITED STATES racketeering acts was another in the sequence of patterns of multi-layered entrapment attempts. This sequence was set up by first

contact in May 2014, implemented in June-July 2015, and acted to destroy evidence (by passage of time) of the financial crimes undertaken at ESTABLISH (paragraph 643 RICO-5) and by CHALOM (paragraph 642 RICO-4). This Bank of America sequence was a modified and more predatory reprise of Lead Plaintiff's experience with "Washington Mutual Savings Bank," and his complete inability to understand their method of balance calculation during the 1980s and 1990s, despite being a Certified Public Accountant licensed in Washington state during the 1980s. This difference between his checking account balance as calculated (paper checks were still quite common at this time) by him and by the "Bank" leads to literally thousands of dollars of \$25/\$35 overdraft fees being illegally drains from his account for NSF fees over several years. This repetitive pattern of strong circumstantial evidence leads Lead Plaintiff to believe his finances were then the subject of direct government control by defendant UNITED STATES and have been for decades, comprising additional thousands of color of law RICO and Fourth Amendment violations by defendant UNITED STATES and its co-conspirators.

G. This is yet more evidence, which Lead Plaintiff has reverse engineered years later in preparation of this complaint, indicative of defendant UNITED STATES' massive, sustained and targeted efforts to cause and create circumstances of non-payment of this overdraft to the "Bank," thereby exposing the Lead Plaintiff to potential criminal liability - another instance of an on-going series of nearly perpetual entrapment attempts across his personal and professional life while effecting the destruction of records of its specific culpability for these acts, violations, and injuries. Systematic interferences in Lead Plaintiff's telephonic and electronic communication have and do continue at all times, completely disrupting legal and constitutional rights and legal protections in interstate commerce, and are incorporated in defendant UNITED STATES' complete, total, and direct control of Lead Plaintiff's life circumstances in systematic

violation of constitutional rights, and are representative of comparable acts, violations, and injuries to other members of this class of plaintiffs.

H. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	612 HEXP-9; 642, 643 RICO-4, 5; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	Not applicable

LPEE pages (see technical note on page numbering at paragraph 230):	1686, 1699-1700, LPEEV65-6, 7
Emails and documents by topic and date, also located in LPEE:	Tissiman first hit 140519, Wells Oliver Tissiman 419pm acct info150612, Wells Oliver Tissiman 654pm 150612, Wells Oliver Tissiman 150613, Wells Oliver Tissiman 2015 150615, Wells Oliver Tissiman 1 655am 150616, Wells Oliver Tissiman 2 713am 150616, Wells Oliver Tissiman 3 141110 to 1120am 150616, Wells Oliver Tissiman 3 BA Deposit Slip 1120am 150616, Wells Oliver Tissiman 4 439pm 150616, Wells Oliver Tissiman 5 619am 150617, Wells Oliver Tissiman 6 818am 150617, Wells Oliver Tissiman 7 1207pm act fast on 150617, Wells Oliver Tissiman 8 105pm 150617, Wells Oliver Tissiman 9 343pm 150617, Wells Oliver Tissiman 9190 150622, Wells Oliver Tissiman 150616R BA 180K NSF 150707, Wells Oliver Tissiman P BA 180K NSF 150707, Wells Oliver Tissiman Q re bank fraud 150715

657. *RICO-19 Racketeering Violations: False Personation – NYC Forbes 200 Captive Corporate Investment Firm 2013-2017*

A. Defendant Daniel WEINER, a practicing attorney in New York City, engaged in false personation, fraudulently misrepresenting himself as a defendant ARLON GROUP employee to further the defendants’ overall scheme of fraudulent interferences in interstate commerce, thereby coordinating with and playing an on-going role from 2013 in a complex scheme of racketeering acts integrating sales, production, operations, and financing frauds and misrepresentations to deprive Lead Plaintiff and his related entities of authentic opportunities to engage interstate commerce. This scheme requires and consumes the time and financial resources of Lead Plaintiff and his business entities in the bad faith perpetuation of defendants’ long-running schemes, frauds, swindles, and pattern of racketeering acts. See LPEE pages 386, 3938.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	170; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0039, 2-0047, 2-0053, 2-0054, 2-0059, 2-0171, 2-0173, 2-0179
LPEE pages (see technical note on page numbering at paragraph 230):	386, 3938
Emails and documents by topic and date, also located in LPEE:	Arlon WEINER intial hit 130202, Arlon update to WO team 130203, Arlon Declines 130207, Arlon WEINER reprise 170510,

	Arlon Weibel DD Callahan (KEENE) phone call set 170530, Arlon Weibel from WEINER 170530, Arlon Danl WEINER 170826, WEINER Arlon 130202
--	---

658. RICO-20 Racketeering Violations: Fraudulent Investor Personation - Investments and Loans 2015-2019

A. Defendant DEAN T. SMITH (defendant FBI, most probably Sacramento field office) responded to an online EquityNet.com (website whose electronic communications are captive to defendant UNITED STATES intercepts and interventions) solicitation of accredited investors and made an initial investment of \$100,000 in August 2015 (FBI funds), then made a series of additional investments and loans from allegedly personal funds, trusts, and entities. These funds were used to perpetuate this four year episode of involuntary servitude from August 2015 to September 2019, adding still more years to defendants' perpetual string out and involuntary servitude by defendant UNITED STATES and its co-conspirators as they blocked Winnett, its subsidiaries, and Lead Plaintiff from actual, legitimate interstate commerce activities, primarily using (i) electronic frauds including, without limitation, wire fraud, email fraud, computer access device fraud; and (ii) other color of law abuses of police powers operations in, without limitation, Pima, Maricopa, and Mohave Counties and other locations in Arizona, in New York state including in New York City, and in New Jersey, Nebraska, Arkansas, Missouri, and Washington state, as well as (iii) international co-conspirators such as externally based CIA personnel and friendly foreign intelligence services, and (iv) explicitly screened-in domestic and international bad actors.

B. In total, FBI expended approximately \$200,000 of agency funds which were secretly invested in Winnett in their 2015-2109 entrapment attempt series against Lead Plaintiff led by

“investors” DEAN T. SMITH, Auburn, CA and DOUG PETERSEN, Brookline, NH. These FBI funds were then effectively recycled through other undercover entities including, without limitation, ADAMSON BROTHERS, I-BANK ATTORNEYS, SULLIVAN, INSIGHT NETWORK, PPM EXPERTS, CORNHUSKER CAPITAL as well as individual defendants including, without limitation, FBI’s NICKLESS, CASTRO, PAUL SMITH, BLITCH, WASEMAN, LEBLOND, (all Winnett embedded FBI fraudulent officers and employees), DOJ/FBI Daniel KREWSON (MULTIFUNDING) as they engaged in bad faith acts interfering with interstate commerce.

C. Fraudulently placed employees and legal counsel also personally took stock options in various Lead Plaintiff owned and controlled private businesses for future benefit:

Grantee	Date	Shares	Price	Grant Number
<i>Winnett Perico:</i>				
P Smith	Sep 30 2015	200,000	\$ 5.50	G150930-1
M Castro	Sep 30 2015	200,000	\$ 5.50	G150930-2
P LeBlond	Sep 30 2015	200,000	\$ 5.50	G159015-3
J Waseman	Dec 1 2015	40,000	\$ 5.50	G151201-1
R Gomez	Dec 1 2015	40,000	\$ 5.50	G151201-2
D Mota	Dec 1 2015	40,000	\$ 5.50	G151201-3
R Sullivan	Dec 1 2015	40,000	\$ 5.50	G151201-4
G Crossgrove	Dec 1 2015	40,000	\$ 5.50	G151201-5
R Foland	Jan 14 2016	40,000	\$ 5.50	G160114-1
M Vindiola	Jan 14 2016	40,000	\$ 5.50	G160114-2
B Blitch	Jan 14 2016	40,000	\$ 5.50	G160114-3
B Reed	Jan 15 2017	40,000	\$ 5.50	G170115-1
R Wood	Jan 17 2017	40,000	\$ 5.50	G170117-1
<i>Sheldon Beef:</i>				
C Canchola	Feb 25 2020	7,750	\$ 0.01	200225-1
J Nickless	Feb 25 2020	7,750	\$ 0.01	200225-2
J Waseman	Feb 25 2020	7,750	\$ 0.01	200225-3

D. PAUL SMITH (FBI undercover name of unknown agent) also persisted in attempting to secure back-dated stock options to be signed off by Lead Plaintiff during his fraudulent tenure

as incoming CFO of Winnett, as he engaged in protracted delays and harassment throughout his preparations of financial projections, consistent with FBI tradecraft and interferences with interstate commerce as forensically reverse engineered.

E. These funds were being expended in good faith by Lead Plaintiff intending to raise additional funds and accomplish interstate commerce including, without limitation, to fulfill sales orders and prospective sales contracts from corporate entities including, without limitation, Albert's Organics, Albertsons, WALMART, KROGER and, COSTCO through Bridge's Produce, Portland, OR. This sequence also inculpated defendant ARPAIO (Interline Exhibit 5) in various acts, violations, and injuries in interstate commerce as he posed as Greg Crossgrove, a produce industry and organic production consultant.

F. These FBI agency funds were expended in interstate commerce to perpetuate involuntary servitude to sustain constitutional rights violations against Lead Plaintiff in defendant UNITED STATES' illegal BRMT bioweapon and bioweapon system development and deployment, civil and constitutional rights violations, and pattern racketeering acts sustained by the co-conspirator associated-in-fact enterprise from inception.

G. In 2019, defendant DEAN T. SMITH (UNITED STATES, FBI Sacramento) filed litigation in the Eastern District of California (19-cv-01918, which see on Pacer.gov) which further extended Lead Plaintiff's involuntary servitude and functionally destroyed the interstate commerce startup Winnett and its subsidiaries, as described herein at Interline Exhibits 6, 11, paragraph 626 RGTS-6.

H. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude

over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953).

Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	6 specifically, 4 through 14
Complaint paragraphs:	626 RGTS-6; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	Entirety of column entitled Actions: Destroy Career, Businesses; Pretext, Entrap, Incriminate from 2-0165 through 2-0187
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 380, 382, 430, 8472-8473, 9642, 9645, 9646-9647, 9907, 9925, 9926, 9997, 10004, 10157, 10164, 10165-10171
Emails and documents by topic and date, also located in LPEE:	Shareholder Info D Smith Address Preferred Trust 150821.pdf Smith adds investment 160326, Smith 5K View Wire Transfer Detail - U.S 170126, Smith Active Air Freight LLC USbank wire 1000 170315, Smith adds 1000 170315, Smith avail escrow funds 170531, Smith VP Fin intvw and connect DSmithPDX 150826, Smith on expenses Vindiola 160114,

	<p> Smith on BA pers acct scam wire xfrs 160125, Smith on Jabor wire fee scam 160125, Smith on potential financing network intro 160217, Smith on development costs per acre 160406, Smith sales intro call in AZ 160704, Smith re Oliver Term Sheet 160707, Smith re fine tuning on Oliver financial proposal 160720, Smith re IT traceability budget add Oliver Hyder 160731, Smith re Status Report Detail on Hyder Oliver et al 160818, Smith Triple Fresh Contact on Sales Prospects 160907, Smith status 160908, Smith Triple Fresh passes setback on sales 160915, Smith re WMT prior sales agents failures 161011, Smith re continuation 161012, Smith re 2500 add 161022, Smith re avocdos sales hook and PACA 161102, Smith re Blockpool Funding 170202, Smith re backup plan 170322, Smith re SHEFFORD Active Air Frt LLC 170322, Smith re collateral support for loan 170323, Smith re prior lost orders and funding level 170427, Smith re investor lead development 170504, Smith re trip 170506, Smith worried 170510, Smith escrow lender fail 170603, Smith complains 170712, Smith referred investor 170719, Smith re WMT 170811, Smith on 7500 loan and cattle rotation 170914, Smith re 7500 loan and cattle rotation 170914, Smith update WMT ND investor 171106 Smith 100K Check 1of2 150730.pdf Smith 100K Check 2oof2 150730.pdf Smith 100K Subscription Agreement SKMBT_C36415072911310 DB Signed 150729.pdf Smith Litigation Halt Proposal to resume company operations 200106.pdf Smith Litigation SULLIVAN Winnett - WCC Letter Respond to Evers-DSmith 190621.pdf Smith Litigation SULLIVAN Winnett - WCC Letter to Evers - Dean Smith III 190723.pdf Smith Litigation Winnett - WCC Letter Responding to Evers - Dean Smith II 190710.pdf Smith Note 5K 190201.pdf Smith Loan pays CORNHUSKER Retainer 10125 Smith \$30K Loan 10157 </p>
--	---

	Smith \$5K loan 10164 Smith Paid COSTCO Trip Hotel Reservation 10165-10171
--	---

659. RICO-21 Racketeering Violations: Fraudulent Investor Personation and Investments 2015-2020

A. Defendant Doug PETERSEN (FBI embedded as CEO of Worker’s Credit Union, resident of New Hampshire) responded to an online EquityNet (website, whether spoofed or actual, whose electronic communications were and/or captive to defendant UNITED STATES intercepts and interventions as to Lead Plaintiff) solicitation of accredited investors and invested \$25,000 in 2015, plus additional funds over following years, from personal funds and retirement trusts. These funds were used to perpetuate this four year episode of involuntary servitude from August 2015 to September 2019, adding still more years to defendants’ perpetual string out and involuntary servitude by defendant UNITED STATES and its co-conspirators as they blocked Winnett, its subsidiaries, and Lead Plaintiff from actual, legitimate interstate commerce activities, primarily using (i) electronic frauds including, without limitation, wire fraud, email fraud, computer access device fraud; and (ii) other color of law abuses of police powers operations in, without limitation, Pima, Maricopa, and Mohave Counties and other locations in Arizona, in New York state including in New York City, and in New Jersey, Nebraska, Arkansas, Missouri, and Washington state, as well as (iii) international co-conspirators such as externally based CIA personnel and friendly foreign intelligence services, and (iv) explicitly screened-in domestic and international bad actors.

B. In total, defendant FBI expended approximately \$200,000 of agency funds which were secretly invested in Winnett in their 2015-2019 entrapment attempt series against Lead Plaintiff led by “investors” DEAN T. SMITH, Auburn, CA and DOUG PETERSEN, Brookline, NH. These FBI funds were then effectively recycled through other undercover entities including,

without limitation, ADAMSON BROTHERS, I-BANK ATTORNEYS, SULLIVAN, INSIGHT NETWORK, PPM EXPERTS, CORNHUSKER CAPITAL, as well as individual defendants including, without limitation, FBI's NICKLESS, CASTRO, PAUL SMITH, BLITCH, WASEMAN, LEBLOND, (all Winnett embedded FBI fraudulent officers and employees), DOJ/FBI Daniel KREWSON (MULTIFUNDING), as they engaged in bad faith acts interfering with interstate commerce (paragraphs 471-489, Interline Exhibits 4-12).

C. These funds were being expended in good faith by Lead Plaintiff intending to raise additional funds and accomplish interstate commerce including, without limitation, to fulfill sales orders and prospective sales contracts from corporate entities including, without limitation, Albert's Organics, Albertsons, WALMART, KROGER, and COSTCO through Bridge's Produce, Portland, OR. This sequence also inculpated defendant ARPAIO (Interline Exhibit 5) in various acts, violations, and injuries in interstate commerce as he posed as Greg Crossgrove, a produce industry and organic production consultant (paragraph 645 RICO-47).

D. These defendant FBI agency funds were expended in interstate commerce to perpetuate involuntary servitude to sustain constitutional rights violations against Lead Plaintiff in defendant UNITED STATES' illegal BRMT bioweapon and bioweapon system development and deployment, civil and constitutional rights violations, and pattern racketeering acts sustained by the co-conspirator associated-in-fact enterprise from inception.

E. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent,

to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4 through 14
Complaint paragraphs:	471-489, 645 RICO-47; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0039, 2-0047, 2-0053, 2-0054, 2-0059, 2-0171, 2-0173, 2-0179, column entitled Actions: Destroy Career, Businesses; Pretext, Entrap, Incriminate from 2-0165 through 2-0187
LPEE pages (see technical note on page numbering at paragraph 230):	9653, 9917, 9923
Emails and documents by topic and date, also located in LPEE:	PETERSEN Stock Cert Issued 150927, PETERSEN Status comments 160107, PETERSEN adds 2500 170102, PETERSEN re backup financing plans 170315, PETERSEN stock for cash infusion 170420, PETERSEN adds 2500 170516, PETERSEN re investor options 170516, PETERSEN stock cert 170519, PETERSEN FL agent on funds xfr 170913, PETERSEN FL agent stock cert 170914, PETERSEN re WMT China 171016, PETERSEN extends 171024,

	PETERSEN re funding next steps WMT 180301, PETERSEN re WMT China 180301 PETERSEN Midland Completed New Asset Information Document.5.10.17 170510.pdf 150831 PETERSEN 25K Inv Check 150831.pdf 150927 WP Stock Cert 004 Preferred Series A Doug PETERSEN 150927.pdf 160404 WP Stock Cert 007 Preferred Series A Doug PETERSEN 160404.pdf 170103 WP Stock Cert 009 Preferred Series A Doug PETERSEN 170103.pdf 170420 WP Stock Cert 010 Preferred Series A Doug PETERSEN 170420.pdf 170519 WP Stock Cert 011 Preferred Series A Doug PETERSEN 170519.pdf 170708 WP Stock Cert 012 Preferred Series A Doug PETERSEN 170708.pdf 170914 WP Stock Cert 014 Preferred Series A Doug PETERSEN 170914.pdf 180305 WP Stock Cert 015 Preferred Series A Doug PETERSEN 200225 SBI 006 PETERSEN Stock Cert Common 200225.pdf
--	---

660. RICO-22 Racketeering Violations: Fraudulent Financings – Private Placement and Public IPO 2015-2017

A. Defendant ADAMSON Brothers (with defendant Andrew ALTAHAWI as CEO, FBI Newark, NJ) primarily operating from Paramus, NJ, offered investment banking services to Winnett, including a \$22 million private placement shown at Interline Exhibit 7, to be followed by a public offering using an SEC S-1 registration statement to provide those investors with future liquidity, the classic financing SEC public process legitimately used by private companies when investment market conditions are favorable.

B. Winnett expended \$40,000 with ADAMSON of invested funds from DEAN T. SMITH (FBI, Sacramento) for this fraudulent private placement (Interline Exhibit 7, LPEE pages 8507-8514, 8524-8654, 8565-8626, zero dollars raised from the investors) and for legal

fees to defendant I-BANK ATTORNEYS of Illinois to prepare the SEC Form S-1 public stock offering registration statement for the promised public offering which was to follow for Lead Plaintiff's company, Winnett. The alleged interstate private placement raised zero dollars after an extended delay, consistent with both prior and subsequent experience in other defendant UNITED STATES racketeering interferences in interstate commerce from 1983, and which would be experienced by Lead Plaintiff again through a small but highly prestigious old line Wall Street brokerage and investment banking firm in 2017, DOMINICK (KEENE, GROSS) including, without limitation, in conspiracy with other members of this associated-in-fact enterprise with police powers operations at WALMART (Bentonville, AR. MCCORMICK, among others) and KROGER (Blue Vine, OH, KREMPEL, MERCED), (paragraphs 471-489, Interline Exhibits 4-12).

C. During the preparation of the SEC S-1 statement, defendant ADAMSON's CEO ALTAHAWI delayed the required financial statement audit by delaying his auditor recommendation, so Lead Plaintiff's company was unable to file audited financial statements with the S-1 public offering statement for timely SEC review. In the meantime, other actions were taken by defendants in Lead Plaintiff's captive environment to orchestrate delays and exhaustion of company and personal funds, so Lead Plaintiff and Winnett were unable to pay the auditors to provide the signed audit opinion within the required SEC filing period, which then expired for the S-1, effectively trashing the entire set of expenditures made by Winnett and further extending involuntary servitude and acts, violations, and injuries by defendant UNITED STATES and its co-conspirators.

D. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running

schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	7 specifically, 4-12
Complaint paragraphs:	471-489; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0039, 2-0053, 2-0054, 2-0059, 2-0173
LPEE pages (see technical note on page numbering at paragraph 230):	8507-8514, 8565-8626, 9923
Emails and documents by topic and date, also located in LPEE:	AJSH Jain re xmit audited fin stmts 151205, ALTAHAWI re S1 PPM fees 150909, ALTAHAWI 40K and info for S1 PPM 150910, ALTAHAWI re PPM corrections150919, ALTAHAWI re any progress S1 PPM 150928, ALTAHAWI re auditor ref 150929, ALTAHAWI PPM progress 151001, ALTAHAWI re auditor engagement ltr 151001,

	ALTAHAWI S1 PPM progress 151005, ALTAHAWI PPM connection 151007, ALTAHAWI re Jabor MEC fee 151028, ALTAHAWI Tracy re 100mm debt PPM 151203, ALTAHAWI Jain re auditor consent 160108, ALTAHAWI re auditors 160111, ALTAHAWI on status 160115, ALTAHAWI on status 160126, ALTAHAWI on status 160324, ALTAHAWI on status 160401, ALTAHAWI on investor search fail 161122, ALTAHAWI re status 161122, ALTAHAWI re Dropbox Access to BLACKPOOL 170202, ALTAHAWI Auditors popup 171114, ALTAHAWI ADAMSON 150908 Capital Markets Agreement Signed 150908.pdf ALTAHAWI ADAMSON 150908 Consultancy Agreement, Winnett Perico Signed 150908.pdf ALTAHAWI ADAMSON 22MM WP PPM FINAL 150920.pdf ALTAHAWI ADAMSON Consultancy Agreement ANNEX A.pdf Ibankattny S-1 update email 161022, KUNSAK re ALTAHAWI ADAMSON Contract 160108, WO Status Report ADAMSON PPM 150917, WO Team re PPM S-1 processes 150921
--	--

661. RICO-23 Racketeering Violations: Fraudulent Financings, International CFIUS Pretexting 2015

A. At Lead Plaintiff's request, Defendant SULLIVAN (paragraph 171, 626A(v) RGTS-6, then representing himself as a former CPB investigator and attorney as a result of an introduction by JACKSON) consulted a third party attorney to assist in determining the veracity of the Qatar Ministry of Economy and Commerce document (LPEE pages 750-752) required to secure a license to process a USD \$52,000,000 investment by Jabor International Investment QSC, ostensibly controlled by members of Qatar's al-Thani royal family. Lead Plaintiff's company, Winnett, paid \$9975 by wire transfer to an account in the United Kingdom (not Qatar). See LPEE pages 754-765, 10108-10118.

B. On knowledge and belief, this alleged investment was in fact a defendant CIA international fraud and forgery in the name of the Qatari royal family using official government forms. The \$9975 wire transfer to the United Kingdom (not to Qatar) was just under the \$10,000 government disclosure limit, as intended by defendant UNITED STATES to conceal this transfer from official US government records during perpetration of this fraud by defendant UNITED STATES (most probably CIA), in the same pattern demonstrated at paragraph 656C RICO-18, Bank of America, Ramsey, NJ when \$9200 cash had to be physically transferred from Wells Fargo, Ramsey, NJ to Bank of America, Ramsey, NJ. Similar property theft abuses just under the \$10,000 reporting limit which also constitute racketeering acts in deprivation of property rights by defendant UNITED STATES include paragraphs 610I HEXP-7, 656 RICO-18, 830D, 831G, and an international \$5,000 reporting limit at paragraph 665.

C. Lead Plaintiff took a copy of this signed \$52 million Jabor International Investment QSC agreement with him to an October 2015 organic vegetable packing plant construction design meeting in the otherwise empty Willmeng Construction headquarters building in Maricopa County, AZ. He showed the signed \$52,000,000 financing contract document to ARPAIO (known as Greg Crossgrove, defendant MARICOPA SHERIFF, ARPAIO) who sat to the Lead Plaintiff's immediate left, as they faced a large video conference viewing screen for a project design progress discussion with Lino BELLI and his Belli Architectural Group team members, Salinas, CA, for the WinnettOrganics (a Winnett trade name) Central Arizona Distribution Center organic vegetable production plant planned for Eloy, AZ . See LPEE pages 1740, 8489-8506.

D. Since the ostensible \$52 million investment involved members of a foreign government in a material investment in a US business, it would have required review by CFIUS,

yet another fraudulent entrapment pretext in the long-running series of defendant FBI and CIA entanglement and entrapment attempts to sustain their associated-in-fact enterprise acts, violations, and injuries directed at Lead Plaintiff for the purpose of perpetuating illegal BRMT development and deployment operations in their on-going pattern of illegal BRMT, rights, and racketeering acts, violations, and injuries which are representative of these associated-in-fact enterprise patterns perpetrated against this class of plaintiffs. Lead Plaintiff discussed this CFIUS review requirement with SULLIVAN, a well-experienced ostensibly former defendant DHS CPB attorney and investigator who had worked with CIA and JACKSON, but the fraudulent defendant UNITED STATES (FBI/CIA) \$52 million investment never transpired, as was defendant UNITED STATES pattern of practice to and since that time.

E. Lead Plaintiff also spent an extra week in Tucson, AZ during this time waiting for a site visit by Dr. Moise Anglade, a Miami, FL area cardiologist, allegedly interested in making a six figure investment. Anglade cancelled the meeting late in that week of waiting by Lead Plaintiff, another now familiar delaying tactic of defendant FBI to expend the limited resources of others to pursue its pattern of racketeering acts while interfering in interstate commerce.

F. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention

directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953).

Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4 through 14
Complaint paragraphs:	171, 626A(v) RGTS-6, 656C RICO-18; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0039, 2-0047, 2-0053, 2-0054, 2-0059, 2-0171, 2-0173, 2-0179
LPEE pages (see technical note on page numbering at paragraph 230):	754-765, 10108-10118; 1740, 8489-8506
Emails and documents by topic and date, also located in LPEE:	BELLI 14077 BELLI-WO PSA Signed 150917.pdf BELLI 14077 WO Mtg Agenda Salinas 150925.pdf BELLI 14077_Meeting Minutes 150918.pdf BELLI 14077_Project Contacts 150925.pdf BELLI 14077_Winnett Organics Kick-Off Meeting Minutes 1 150925.pdf D Brewer Air Itenerary EWR PHX Hold for Anglade EWR 150830.pdf D Brewer Car Rental Itenerary EWR PHX Hold for Anglade EWR 150830.pdf D Brewer FS for SBI Surety Bond 413-NEW-as-of-7-30-2018 180730 .pdf D Brewer Hotel EWR PHX Hold for Anglade EWR 150830.pdf D Brewer Hotel Tucson EWR PHX Hold for Anglade EWR 150830.pdf D Brewer US Airways EWR PHX EWR 150830.pdf Swisslog Winnette Organics-Budget Proposal 12-28-2016 v1 1 161228.pdf

	Jabor Funding Due Diligence151012, Jabor dilution and free trading share plan 151014, Jabor investor team info to SULLIVAN 151020, Jabor Due Diligence Info SULLIVAN 151021, Jabor Funding Agreement 151021, Jabor investor wire xfr date 151021, Jabor Funding Stock Adj PETERSEN 151022, Jabor Funding wire tomorrow 151026, Jabor Funding MEC fee and agreement sig page 151027, Jabor MEC fee wire xfr record TD Ameritrade 151028, Jabor Funding MEC fee wire MIA 151030, Jabor Funding Cconfirm to BELLI Salinas 151105, Jabor Funding MEC License Rcvd 151105, Jabor Funding Bust 151119 DoubleK Invoice Ricky King 10132- 10133
--	---

662. RICO-24 Racketeering Violations: Fraudulent Financing Fees Supporting Fraudulent Sales Opportunities 2018

A. Defendant SALLYPORT, a commercial financing company domiciled in Texas, was paid an application fee of \$2,000 for Accounts Receivable and Purchase Order financing services which arose as a result of, and/or were interfered with, by defendant UNITED STATES and its co-conspirators, through their offering of fraudulent pending sales orders and contracts in 2018 which they had no intention to complete, and which were elements of a pattern of commercial entity and police powers frauds and conspiracies of defendant UNITED STATES and its co-conspirators in commerce and interstate commerce, which have and do consume financial resources and management time of Lead Plaintiff and the entities he has and/or does legally own, control, and/or manage. See LPEE pages 9271-9272, 9281-9283, 9312-9313, 10005.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude

over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953).

Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4 through 14
Complaint paragraphs:	474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	Not applicable
LPEE pages (see technical note on page numbering at paragraph 230):	9312-9313, 9271-9272, 9281-9283, 10005
Emails and documents by topic and date, also located in LPEE:	180814 SALLYPORT 1750K SCF Proposal Letter Winnett Cattle Company Inc_ (003) 180814.pdf 180414 SALLYPORT Signed SCF Proposal Letter Winnett Cattle Company Inc_ (003) 180616 SALLYPORT Signed SCF Application 180616.pdf

663. RICO-25 Racketeering Violations: Fraudulent Financing Fees 2018

A. Lead Plaintiff business entities paid fees to alleged financial services providers in April, August, and October of 2018 totaling \$14,950. Access to the accounting detail which identifies these potential defendants is currently blocked from access by defendant UNITED STATES, so the payees' identities and the exact amounts of these payments are currently not discernible. See LPEE pages 10026, 10027 second line, 10028 second line (also excepted below), for the currently accessible recordation of these expenditures.

LPEE page 10026 excerpt:

Winnett Cattle Company, Inc.	
PROFIT AND LOSS	
January 1 – December 31, 2018	
	TOTAL

LPEE page 10027 excerpt (2018 summary from accounting records):

	JAN	FEB	MAR	APR	MAY	JUN	JUL
Bank fees				189			
Financial provider fees				5450			

LPEE page 10028 excerpt (continuing the 2018 record above to succeeding months):

AUG	SEP	OCT	NOV	DEC	Total
					189 xx
4500		5000			14950 xx

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and

racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0039, 2-0047, 2-0053, 2-0054, 2-0059, 2-0171, 2-0173, 2-0179
LPEE pages (see technical note on page numbering at paragraph 230):	10027 second line, 10028 second line
Emails and documents by topic and date, also located in LPEE:	Blocked by defendant computer email access hack

664. RICO-26 Racketeering Violations: Fraudulent Financial Services – Domestic Debt Broker 2018

A. Defendant NEW AMERICA LENDING, a Illinois domiciled LLC owned and managed by David Choate HUGHES, which has and/or does engage in commercial financing and broker/finder of private investors for commercial enterprises company was paid fees totaling \$7,500 to arrange or complete financing for the Lead Plaintiff's company, to be supplied by defendant NEW AMERICA LENDING, as represented by HUGHES in these transactions as

using its own internally controlled loan and equity investment funds, and those of third parties to be raised by defendant NEW AMERICA LENDING, to finance general working capital, specific assets, and/or sales opportunities of the Lead Plaintiff's Winnett commercial entities. Lead Plaintiff entities were defrauded by these bad faith acts of NEW AMERICA LENDING and HUGHES. See LPEE pages 9314-9318, 9328-9337, 9394-9401, 9653, 10011, 10021. Relevant emails from this period are currently blocked by defendant UNITED STATES as this Complaint is being prepared. HUGHES was either a defendant FBI agent, asset or investigatory subject permitted to enter the carefully controlled electronic environment used violate constitutional rights and to sustain the involuntary servitude and control of Lead Plaintiff as an involuntary human subject of the illegal BRMT bioweapon and bioweapon delivery system program and the associated-in-fact enterprise of defendant UNITED STATES, DOJ, FBI, CIA, ARMY, NIAID, and the individual defendants associated therewith, together with all their contemporaneous co-conspirators.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953).

Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4-14
Complaint paragraphs:	474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0039, 2-0047, 2-0053, 2-0054, 2-0059, 2-0171, 2-0173, 2-0179
LPEE pages (see technical note on page numbering at paragraph 230):	9314-9318, 9328-9337, 9394-9401, 9653, 10011, 10021
Emails and documents by topic and date, also located in LPEE:	150130 MULTIFUNDING SULLIVAN re referral to David HUGHES 150130 Bates.pdf 180823 NAL HUGHES \$2point5MM Initial Term Sheet debenture 180823.pdf 180823 NAL HUGHES \$2K Wire Details 180823.pdf 180905 NAL HUGHES Consulting Agreement Winnerr 180905.pdf 181012 NAL HUGHES 350K min Winnett Conditional Term Sheet (002) 181012.pdf 181012 NAL HUGHES \$5000 Compl Wire 181012.pdf

665. RICO-27 Racketeering Violations: Fraudulent Financial Services -International Debt Broker 2015-2016

A. Winnett expended \$4,950 with PPM Experts in Europe for the preparation of a Private Placement Memorandum required for fraudulent private placement services by defendant INSIGHT NETWORK and Don KEISER, which thereupon engaged in pretending to work to place \$100 million of debt with European and other investors and submitted false and

misleading progress reports to Lead Plaintiff by email and phone. Exactly zero dollars were raised in this fraudulent scheme, another in the long-running series of investor and investment finder/banker agreements frauds failing to provide honest services in interstate commerce. During this same period, other actions were taken by defendants in their captive environment of Lead Plaintiff to continue to exhaust personal and business entity funds, see paragraphs 612 HEXP-9, 622 637 RGTS-2, 17; paragraphs 640, 655-661, 668-670 RICO-2, 17-23, 30-32, as elements of this conspiracy across all defendants.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as

well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4-14
Complaint paragraphs:	474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0039, 2-0047, 2-0053, 2-0054, 2-0059, 2-0171, 2-0173, 2-0179
LPEE pages (see technical note on page numbering at paragraph 230):	8563-8564, 8627-8714, 9923
Emails and documents by topic and date, also located in LPEE:	INSIGHT KEISER Intl Debt placement 100mm 151028, INSIGHT Ovar Intl Debt placement 100mm 151029, INSIGHT KEISER Terms for Intl Debt placement 100mm 151104, INSIGHT Verbal Commit by WO 151104, INSIGHT PPM Winnett Perico 151201, INSIGHT status inquiry 160112, INSIGHT status report 160113, INSIGHT status report 160122, INSIGHT re lack of progress 160418, PPM Expert Invoice 145.11-2015 Winnett Perico, Inc 151117 PPM Expert 100MM Debt Offer Document Winnett Perico 160105.pdf PPM Expert Questionnaire 151123.pdf

666. RICO-28 Racketeering Violations: Fraudulent Financial Services – Mid-Market Investment Bank 2016-2017

A. Defendant MADISON STREET Capital’s various officers and employees, while defendant police powers agents, officers, and/or confidential informants, and as a part of this on-going conspiracy and pattern of racketeering acts, represented themselves and their firm as capable of and sincerely interested in, securing financing on behalf of Lead Plaintiff’s business entities, and thereby conspired, during 2015 through 2018 in a complex sales, production, operations, and financing scheme and conspiracy to deprive Lead Plaintiff and his related entities of authentic opportunities to engage interstate commerce. This scheme required and

consumed the time and financial resources (\$1,950 per a signed agreement on April 5, 2018) of Lead Plaintiff and his business entities in the bad faith perpetuation of defendants' long-running schemes, frauds, and swindles.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4 through 14
Complaint paragraphs:	474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0039, 2-0047, 2-0053, 2-0054, 2-0059, 2-0171, 2-0173, 2-0179;

LPEE pages (see technical note on page numbering at paragraph 230):	9270, 9722
Emails and documents by topic and date, also located in LPEE:	MADISON ST Capital 160328, MADISON ST outreach 170726, MADISON ST Ibanker Madison St Capital initial hit 170727

667. RICO-29 Racketeering Violations: Fraudulent Financial Services - International Financial Services Institution 2016-2017

A. Defendant Bank of America BESTWICK CARDONE Group Senior Vice President Robert BESTWICK and Vice President Andrew CARDONE (defendant FBI Manhattan, New York) with offices embedded in Bank of America, N.A., at One Bryant Park, New York, NY, held a Natural Foods Symposium in New York City in May 2016, and invited Lead Plaintiff to this fraudulent conference for the purpose of sustaining involuntary servitude, defrauding, and acquiring intelligence, and to introduce Lead Plaintiff to DOMINICK investment banker Michael Callahan (KEENE), thereby aiding and abetting the fraudulent scheme, swindle, and conspiracy of defendant UNITED STATES and its co-conspirators. See also paragraph 668 RICO-30.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention

directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953).

Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4-14
Complaint paragraphs:	668 RICO-30; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0178, 2-0179
LPEE pages (see technical note on page numbering at paragraph 230):	8805-8812, 9094
Emails and documents by topic and date, also located in LPEE:	BA BESTWICK CARDONE AXIAL Nat Food Symposium 160415, BA BESTWICK CARDONE on my BA history160502, BA BESTWICK CARDONE Fake Food Symposium 160531, BA BESTWICK CARDONE on RAM CS sales contract 160608, BA BESTWICK CARDONE referes Callahan (KEENE) DD 160707, BA BESTWICK CARDONE re intro at DD 160712, BA BESTWICK CARDONE progress report DD 160808, BA BESTWICK CARDONE lunch pre DD mtg 160927, BA BESTWICK CARDONE sked Kiely call 161024, BA BESTWICK CARDONE NYC Keily trust ref call161102, BA BESTWICK CARDONE on KROGER uptake agreed 161110, BA BESTWICK CARDONE update 170227, BA BESTWICK CARDONE on Balckpool fail new search DD170323,

	BA BESTWICK CARDONE on BLACKPOOL SHEFFORD 170324, BA BESTWICK CARDONE Fake Food Symposium 170516, BA BESTWICK CARDONE Fake Food Symposium 170609, BA BESTWICK CARDONE alt ibanker intro 171130, BA BESTWICK CARDONE re Skaar alt ibankers intro offer 171130
--	--

668. RICO-30 Racketeering Violations: Fraudulent Financial Services – Wall Street and Los Angeles Investment Banks 2015-2021

A. Defendants Michael Callahan (KEENE) and Mark GROSS, while acting as defendant agents, officers, or confidential informants, (defendant UNITED STATES’ CIA, FBI, as well as media industry allowed to operate inside the conspiracy to obstruct interstate commerce) as part of this on-going conspiracy and pattern of racketeering acts, represented themselves and their firm, defendant DOMINICK, as capable of and sincerely interested in, securing financing on behalf of Lead Plaintiff’s business entities, thereby conspiring, coordinating with, and playing an on-going role during 2016-2017, and thereafter into 2021 in a complex sales, production, operations, and financing scheme to deprive Lead Plaintiff and his related entities of authentic opportunities to engage interstate commerce (paragraphs 991., 222, 602 NSEC-3, 660, 667 RICO-22B, 29).

B. Robert FINKELSTEIN sustained a fraudulent relationship with Lead Plaintiff and his entities, misrepresenting his firm Del Morgan, domiciled in southern CA, as capable of and sincerely interested in, securing financing on behalf of Lead Plaintiff’s business entities, thereby conspiring, coordinating with, and playing an on-going role during 2016-2017 in a complex sales, production, operations, and financing scheme to deprive Lead Plaintiff and his related entities of authentic opportunities to engage interstate commerce.

C. Other defendant bad faith actors and co-conspirators in this fraudulent scheme and swindle include, without limitation, defendants Joseph ARPAIO, both as MARICOPA SHERIFF and individually; Double K Farming and Ricky King, as an associate of ARPAIO; WALMART; KROGER; Willmeng Construction as to use of their facility by FBI, ARPAIO, MARICOPA SHERIFF; RAM Consulting; Richard MILLER, Steve SAYRE, Sean LYLE, and David HINSON (FBI); and fraudulent Winnett employees known to Lead Plaintiff as Bruce BLITCH, Michael CASTRO, Rafael GOMEZ, Peter LEBLOND, Jon NICKLESS, PAUL SMITH, Mark VINDIOLA, and Jason WASEMAN, while acting in bad faith, jointly and severally (paragraph 687 RICO-49).

D. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at

paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4-14
Complaint paragraphs:	991., 222, 602 NSEC-3, 660, 667 687 RICO-22B, 29, 49; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0178, 2-0179
LPEE pages (see technical note on page numbering at paragraph 230):	622-623, 632-635, 639, 642-643, 651-652, 656-658, 659-661, 8770-8787, 8788-8804, 8805-8812, 9193, 9207-9214, 9277, 9280
Emails and documents by topic and date, also located in LPEE:	AltaVista Investment Commitment- Winnett Perico, Inc.161010, AltaVists faked fin 161017, AltaVista fup 161018, AltaVista key personnel intro 161018, AltaVista SULLIVAN re bad actor 161018, AltaVista WP due diligence on AV 161018, AltaVista fake followon funding anncmnt 161025, AltaVista update 161026, BELLI 14077 BELLI-WO PSA Signed 150917.pdf BELLI 14077 WO Mtg Agenda Salinas 150925.pdf BELLI 14077_Meeting Minutes 150918.pdf BELLI 14077_Project Contacts 150925.pdf BELLI 14077_Winnett Organics Kick-Off Meeting Minutes 1 150925.pdf Centerboard Grp as Investor 170517, Centerboard Grp as Finder DD 170526, Centerboard PE intro 170526, D Brewer Air Itenerary EWR PHX Hold for Anglade EWR 150830.pdf D Brewer Car Rental Itenerary EWR PHX Hold for Anglade EWR 150830.pdf D Brewer FS for SBI Surety Bond 413-NEW-as-of-7-30-2018 180730 .pdf D Brewer Hotel EWR PHX Hold for Anglade EWR 150830.pdf D Brewer Hotel Tucson EWR PHX Hold for Anglade EWR 150830.pdf D Brewer US Airways EWR PHX EWR 150830.pdf DD Engagement Letter Signed 160713.pdf

	DD Signed Terminated Engagement Agreement Winnett-Dominick_5_31_17 171116.pdf DD Skaar JBS Letter 170522.pdf DD Skaar Teaser 170905.pdf DD Swisslog Winnette Organics- JAN Mtg 1-24-2017 v1 170124.pdf DD Callahan (KEENE) on Holistic Impact Partners 140417, DD on Oliver Term Sheet 160711, DD Callahan (KEENE) re engement ltr 160714, DD Callahan (KEENE) re cancelled Oliver mtg 160812, DD on Oliver Hyder resurrection 160824, DD re Revolution intro 160825, DD for Revolution WinnettOrganics Presentation 160910, DD Callahan (KEENE) 160914, DD on Revolution VC presentation 160919, DD on Nielson organic foods outlook 160920, DD on DelMorgan intro 160925, DD mtg fup 160929, DD Sep Discussion Document 160929, DD re work Wakefern connection 160930, DD Commitment Cmte pkg to Callahan (KEENE) 161006, DD re Kingman acquisition 161007, DD GROSS on other fin options 161014, DD re Alta Vista involvement 161014, DD Callahan (KEENE) re AltaVista 401pm 161017, DD notes on AltaVista offer 161017, DD Callahan (KEENE) 2 re AltaVista 161018, DD Callahan (KEENE) re AltaVista 1107am 161018, DD Callahan (KEENE) re AltaVista 739pm 161018, DD GROSS on Alta Vista2 161018, DD GROSS re AltaVista 161018, DD on Alta Vista play out 161018, DD on Smith CFO Hyder Stall 161105, DD Hinson on production volumes 161106, DD Callahan (KEENE) on proposed WMT revision 161114, DD Callahan (KEENE) re investor interest 161115, DD on WMT Swisslog 161230, DD re 5 yr plan to WMT 161231, DD Callahan (KEENE) re 170124 Swisslog mtg 170109, DD Callahan (KEENE) re Swisslog mtg 170109, DD Callahan (KEENE) re lending DD name to WMT presentation 170126, DD Callahan (KEENE) re Swisslog mtg fup 170126,
--	--

	DD Callahan (KEENE) on BLACKPOOL funding 170202, DD Callahan (KEENE) re BLACKPOOL Term Sheet 170202, DD Callahan (KEENE) update BLACKPOOL 170227, DD Callahan (KEENE) continue working 170328, DD update to outside bridge potential investor 170410, DD revised Bus Plan adds cattle 170417, DD re Rabo ID Skaar 170503, DD Skaar Site Plan Barns Winnet Site Opt 8 170509, DD Transom re Skaar 170512, DD on Skaar fert option 170513, DD Skaar Barns Detail Site Opt 8 170523, DD Fleming on DD Finl Model 170526, DD Callahan (KEENE) re PE dilutive 170531, DD on Skaar Organic Fertilizer Mkt Size 170531, DD on Skaar Organic Fertilizer Plant Ops 170531, DD on Skaar Organic Fertilizer Plant Concept Plan 170601, DD Skaar Royal Chem CAS numbers Contract Fert Pkg 170604, DD Skaar Site Plan 170605, DD Skaar Site Plan Ammonia Recovery Manure 170605, DD Skaar Organic Fertilizer Effectiveness 170607, DD Skaar Organic Fertilizer Pricing 170607, DD Skaar PE Investor Bid email 170607, DD Skaar PE Investor Bid form 170607, DD re Centerboard Housing Solution WO 170608, DD WCC teaser draft 170608, DD Skaar Organic Fertilizer Production Cost 170609, DD Callahan (KEENE) re funding sked 170612, DD Skaar Organic Fertilizer Advantages 170614, DD WCC Pitch Deck Skaar etal 170614, DD Callahan (KEENE) on DeSai 170616, DD Skaar Biiding Process to SANDERS 170616, DD Callahan (KEENE) on AXIAL lead Chatham 170619, DD Skaar Site Plan Mods 170619, DD NGEN fake NYC investor 170622, DD NYC VAN BRAKEL 170622, DD Callahan (KEENE) re AGIS NDA cmu not credible 170628, DD Skaaar AgIS Boston 170628, DD Skaar Advantage NDA 170628, DD Skaar AgIS Boston 170628, DD Callahan (KEENE) re Skaaar visit sked 170726, DD on HIG Capital Miami 170728,
--	---

	DD Skaar site visit Sander 170728, DD JJU - Winnett Cattle Target Tracker_8_4_17 170804, DD Skaar BDO Auditor SLC Gordon 170804, DD Skaar BDO Auditor SLC Gordon 170807, DD NYC Callahan (KEENE) connects to BDO SLC 170808, DD Skaar Callahan (KEENE) Update 170809, DD LABELLE Teton County 240 Tour Pass 170810, DD Skaar Cost per pound gain 170811, DD Skaar LOI xmit 170811, DD Skaar LOI signing 170821, DD Skaar past contacts 170821, DD Skaar Teton River Farm Feeney email 170822, DD Skaar rev Alt Offer 170828, DD Skaar Teaser 170905, DD Callahan (KEENE) re no progress 170906, DD Skaar Kritser 170907, DD Skaar Kritser to WO team 170907, DD Skaar SANDERS tours Frank MAUGHAN BDO 170913, DD Skaar SANDERS on Kritser alt structure 170915, DD Skaar Kritser re adjusted LOI 170919, DD Callahan (KEENE) on failure to date and breach 170920, DD Skaar Kritser 170921, DD Skaar Sander re Kritser 170921, DD Skaar SANDERS on revised structure 170929, DD Skaar Kritser 171002, DD Skaar Kritser string out 171004, DD Skaar SANDERS Update 171013, DD Skaar SANDERS re Kritser Friona Ind ExCEO call 171022, DD Skaar WMT China ND Rep Sr Legislator BANCO Advisors 171024, DD Skaar Kritser dragout decline to WO team 171110, DD Skaar Revised Buyout 171112, DD Termination Notice 171114, DD Callahan (KEENE) Disappears 171115, DD Callahan (KEENE) acks Termiantion 171117, DD Skaar SANDERS revised LOI 171128, DD Skaar WMT China procurement 180817, DelMorgan re intro 160925, DelMorgan email WP proposal 160928, DelMorgan fup DD declines to share 160929, DelMorgan update WMT 170106, DelMorgan 170110,
--	---

	<p> DelMorgan re DD engagement 170308, DelMorgan re alt retainer arrangement 170324, DelMorgan revised docs170324, DelMorgan re alt firm retainer avail 170327, DelMorgan nogo on alt fee provider 170404, DelMorgan on DD Callahan (KEENE) telcon 170822, DelMorgan 160928 Engagement Summary - WinnettOrganics.pdf DoubleK Invoice Ricky King 10132- 10133 GROSS re Korea beef pgm finance 210115, GROSS re Big Sandy finance 210506, GROSS re grainfed organic taste difference 210513, GROSS 210514, GROSS re Big Sandy rewrite Bus plan 210517, GROSS re mkt research to demo our case 210519, GROSS on organic mkt update 210522, GROSS re organic beef proof of concept 210603, GROSS re WMT Redfield US Grocery SVP 210618, GROSS re Lake County tax advantages opptny zone 210630, Hartman re GROSS organic mkt research inquiry 210520, Hartman re refs and experience 210525, Hartman Group re Organic Mktg Study for GROSS Mark 210603, M GROSS re Korea contract finanaicn g et al 210119, Swisslog automation Jennings NYC in house 161101, Swisslog automation Jennings NYC in house 161107, Swisslog automation Jennings NYC in house 161205, Swisslog to WASEMAN re automation 161228, Swisslog Jennings re DD mtg and progress 170113, Swisslog re NYC meeting notes and fup 170126, Swisslog Deck DD mtg to WO team members 170128, Swisslog Winnette Organics-Budget Proposal 12-28-2016 v1_1 161228.pdf WMT initial hit on cold email 161002, WMT fup Baldwin 161010, WMT MCCORMICK ref from Balwin 161011, WMT sales news to WO team 161011, WMT MCCORMICK Webex 161014, WMT MCCORMICK call tomorrow email 161017, WMT MCCORMICK call fup 161018, WMT MCCORMICK call fup production volumes 161020, WMT MCCORMICK call 161109, WMT MCCORMICK re DD discussion 161114, WMT MCCORMICK resked and participant list 161114, </p>
--	---

	<p>WMT MCCORMICK call fup 161116, WMT MCCORMICK call fup 161118, WMT MCCORMICK re investors ibankers 161121, WMT MCCORMICK on contract outline 170108, WMT MCCORMICK Bentonville Mtg Attendees 170111, WMT MCCORMICK 170224 Bentonville mtg Present Draft 170123, WMT MCCORMICK email Bentonville Mtg Presentation 170123, WMT MCCORMICK Bentonville Mtg Attendees 170216, WMT MCCORMICK Bentonville Mtg Invite 170216, WMT MCCORMICK Bentonville Mtg Location 170216, WMT MCCORMICK Bentonville mtg fup 170222, WMT MCCORMICK re post Bentonville Mtg Rev 170222, WMT MCCORMICK nonreply fup 170328, WMT Baldwin re decision next week 170403, WMT MCCORMICK re mktg plans 170403, WMT MCCORMICK on price drop 170412, WMT MCCORMICK buyer contacts 170425, WMT China Beef ref from MCCORMICK 170703, WMT connects China on beef 170703, WMT China Zheng initial contact 170704, WMT China Zheng merch support 170707, WMT China Zheng ROM pricing 170708, WMT China beef HIGAKI intro 170718, WMT China beef HIGAKI pricing 170811, WMT China HIGAKI price quote 170811, WMT China Hgiaki Quotes Specs 170821, WMT China HIGAKI adding WO factory id 170821, WMT China HIGAKI request factory number add 170821, WMT China HIGAKI quote fup 170822, WMT China WO Status Report WMT China Beef 680 ton order 170921, WMT Chna HIGAKI re WMT contract 170924, WMT China HIGAKI re process steps 170926, WMT China Preferred Freezer initial hit 170926, WMT China Americold initial hit 170929, WMT China Cargill contact punt 171002, WMT China HIGAKI Executed WMT Contract 171010, WMT China Update WO Team 171012, WMT China HIGAKI China visit and update 171023, WMT China HIGAKI re contract signature rqmt 171023, WMT China HIGAKI re JBS Specs 171026, WMT China HIGAKI on revised order pricing 171208,</p>
--	--

	<p> WMT MCCORMICK on China status 171220, WMT China re labeling 180110, WMT China xmit manually signed contract copies 180112, WMT China order processing timeline 180115, WMT China HIGAKI re sked 180116, WMT China order timing Apr 180116, WMT China HIGAKI re factory flow charts trial shipment 180122, WMT China HIGAKI orig signed contracts sent 180123, WMT China CA OWB Packers delay 180131, WMT China HIGAKI intro of SCS process 180201, WMT China HIGAKI re OWB approval 180201, WMT China HIGAKI SCS 180201, WMT China Hgiaki re Cargill Tyson on China 180202, WMT China Higki re OWB SCS audit 180202, WMT China OWB stringout 180206, WMT China OWB stringout 180207, WMT China OWB stringout 180214, WMT China OWB stall 180223, WMT China OWB stall continues 180223, WMT China SamsClub China dragin 180227, WMT China HIGAKI email sig page xmit 180228, WMT China LiqCap AZ update 180228, WMT China PETERSEN re signed contract evidence 180301, WMT China re post OWB to JFO 180301, WMT China JFO inquiry 180302, WMT China re retail link 180302, WMT China status on China 180302, WMT China re local China ofcs 210130, WMT China re China ofc and contact history 210202, WMT China Liao re China ofc details 210204, WMT China on packaged cuts 210222, WMT China docs needed 210312, WMT China Liao re new ofcs in China 210407, WMT China re beef purchase embargo in China 210415, WMT China SAmerica Quote 210422, WMT China rejects BR Tradimpex case ready pricing 210426, WMT China intro to RMC China rep Jason 210428, WMT re US organic beef pgm 210605, WMT Redfield on domestic organic beef 210607, WMT Lehr Organic Beef Intro 210610, WMT re organic beef partner pgm 210615, WMT Lehr video mtg 210616, </p>
--	---

	<p> WMT Lehr re comp organic price premiums on ther products 210617, WMT Redfield cc Lehr video mtg 210617, WMT Lehr alt sales ramp 210618, WMT Lehr Baskin video mtg to come 210702, WMT Hutchins mtg set 210713, WMT Baskin Lehr call fup on pricing 210729, WMT Baskin Lehr video call 210729, WMT Partnering Zoom Call 210729, WMT Baskin on pricing 210810, WMT Baskin status inquiry 210816, WMT Baskin pass 210818, WMT Organic Beef pass 210818, WMT Organic Beef pgm not established 210823, WMT Baskin re pass pricing other issues 210824, WO Plant Kickoff Salinas Mtg 150916, WO Plant Willmeng ref from Sayre 150917, WO Status Report ADAMSON PPM 150917, WO Team re PPM S-1 processes 150921, WO Plant Kickoff Salinas Mtg 150922, WO Plant Willmeng contract draft 151012, WO Plant Willmeng kickoff meet Oct 27 151019, WO Plant Willmeng cost workup status 151021, WO Status Report Jabor and Sales 151022, WO Hyder Farm CASTRO on Oliver 151028, WO Weekly Status Report reaction PETERSEN 151029, WO Hyder Farm Terminal Estimate to Oliver 151030, WO Sales Fresh Express Smith contact 151104, WO Grt Western Bk local takeover visit 151117, WO Team on Jabor Funded on Time 151117, WO Team re Jabor snag 151118, WO Team on financings 151120, WP Paypal Acct Detail Sep-Dec 151231, WO Team on 179mm Financings 160101, WO Status Financings 160121, WO Financings deal status to team 160208, WO Status Kingman Startup Financings 160209, WO Status Report financings 160421, WO Status re Oliver Term Sheet Verbal 160719, WO Status Final Oliver Hyder present sked 160804, WO Status Hyder Oliver rework 160818, WO Status DD Fin Sales 160929, WO Status Report on Hyder Oliver new pitch status 161006, WO on WMT progress 161018, WO Status financings 161103, </p>
--	---

	WO Status Financings WMT KROGER 161115, WO Status KROGER projection incl 161226, WP Great Western 2016 DDA Account 161231, WO Org Chart 170111, WO Blitch re ofc space tour 170118, WO Status Report REED Wood join 170119, WO Team re Gerlach soi tests 170201, WO Blitch re Stockton Hill Famr tour w BLACKPOOL 170203, WO Smith CFO re Revolution VC pass 170203, WO Status Rpt Stockton Hill Update 170209, WO Status Rpt incl WMT status 170223, WO Team re Blackppol to fund 170301, WO Team re BLACKPOOL no reply stringout 170309, WO Team re BLACKPOOL deadline miss 170310, WO Status Report DD retainer need 170320, WO also CARDONE on Status WMT others 170403, WO Team WMT dead Alb on track others 170404, WO Status Skaar 170504, WP Executive Summary Bus Plan 170507, WO Status Report Skaar Investor Interest 170515, WO Team Smith CFO Termination Notice 170612, WO Team Smith CFO Termination 170613, WO Team on DD Funding Skaar Acq Date 170615, WO Status Report Skaar nothing from Alberts 170706, WO Status Report re DD potential investors 170713, WO Status Report Skaar deal progress LOI 170727
--	--

669. RICO-31 Racketeering Violations: Fraudulent Financings and Representation, Online Referral Services 2015-2018

A. Defendant AXIAL.com held an annual investor conference in New York City in Fall 2015 and invited Lead Plaintiff as an interested party. Defendants used this conference, open to the public, to arrange meetings with MADISON STREET Capital, Perella Wasserstein Partners, and Young America Capital, among others. Most of these meetings were carefully arranged for the purpose of screening, acquiring intelligence, and introducing Lead Plaintiff to other defendant police powers officers, agents, and confidential informants to further defendants' fraudulent scheme and swindle by portraying themselves as capable of and sincerely interested

in, securing financing on behalf of Lead Plaintiff's entities, thereby coordinating with and playing an on-going role during 2015 through 2018 in the continuation of their decades long complex sales, production, operations, financing and litigation scheme to deprive Lead Plaintiff and his related entities of authentic opportunities to engage interstate commerce.

B. Defendant AXIAL personnel also later reintroduced themselves using AXIAL email addresses and phone calls to refer Lead Plaintiff to other similar fraudulent contacts and to cut out any contact between Lead Plaintiff and any serious investor interest from the real business and investor community as he made good faith attempts to pursue financing in interstate commerce.

C. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at

paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4-14
Complaint paragraphs:	474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0039, 2-0047, 2-0053, 2-0054, 2-0059, 2-0171, 2-0173, 2-0179
LPEE pages (see technical note on page numbering at paragraph 230):	AXIAL Investor Interest 150904.pdf AXIAL to ALTAHAWI connect 150910.pdf AXIAL NYC re Investor Referrals 171108.pdf AXIAL re Paine Schwartz 171113.pdf AXIAL NYC FRACTAL Intro 171116.pdf AXIAL NYC FRACTAL stall 171129.pdf AXIAL NYC FRACTAL stall 171204.pdf AXIAL NYC FRACTAL drag out 171206.pdf AXIAL fake investor leads 180302.pdf
Emails and documents by topic and date, also located in LPEE:	AGI 1 NYC Investor hit AXIAL 170515, AGI 1 Lee Mtg Set 170517, AXIAL Investor Interest 150904, AXIAL to ALTAHAWI connect 150910, AXIAL NYC re Investor Referrals 171108, AXIAL re Paine Schwartz 171113, AXIAL NYC FRACTAL Intro 171116, AXIAL NYC FRACTAL stall 171129, AXIAL NYC FRACTAL stall 171204, AXIAL NYC FRACTAL drag out 171206, AXIAL fake investor leads 180302, FRACTAL re initial contact 171117, FRACTAL progress 171206, FRACTAL on status and nterest 171221, FRACTAL intro Black Lake Chad Scripps 180117, NYC Investor AXIAL Conf Intro PWP Growth Schectman 151028, NYC Investor from AXIAL Formanek 151027

670. RICO-32 Racketeering Violations: Fraudulent Financings and Financial Representation, Fraudulent Solicited Responses 1986 to 2022

A. Fraudulent commercial financing opportunities required the Lead Plaintiff and his related business entities to expend time and financial resources to locate and attempt to secure these alleged but fraudulent financings, and occurred in conjunction with both fraudulent sales opportunities and fraudulent property acquisitions arranged by defendants in conspiracy with other defendants, including, among others, individual persons and marital communities as owners; various forms of commercial enterprises, some as direct co-conspirators and others who were being spoofed by defendants.

B. Defendants have and do make common use of interstate wire fraud, mail fraud, in-person visits, entertainment, travel, and other means requiring expense or efforts by the Lead Plaintiff on his own behalf and for his business entities. These individuals and entities include, without limitation, all named defendants in various schemes as experienced by Lead Plaintiff and these various business entities, dating from 1986 to 2022 as listed in the Compendium at LPEE pages 934-1075, the table at paragraph 226 (defendants section), as well as those listed below. These defendants include domestic and international entities and individuals legally named above in this Complaint when known, and named as commonly known herein, and/or spoofed as the authentic entity by defendant UNITED STATES and other governments with police powers, their officers, agents and confidential informants, and with bad actors carefully screened-in by these defendants, including many entities for which there is no available pre-discovery evidence that disbursements have been made but that nonetheless required time and resources of the Lead Plaintiff and his business entities to pursue based upon their fraudulent misrepresentations. Many of these are most probably the fictional creations of defendant

UNITED STATES, but those entities are not discernible from authentic entities which also engaged in fraudulent acts. They must necessarily be deduced using discovery from these defendants. These individuals and entities include, without limitation, the following 220 plus domestic and international entities and individuals: Bank of America BA BESTWICK CARDONE; DOMINICK; Alta Vista; EarlyBird Capital; Chardan; NGEN; US Bank; Rabo Bank; JP Morgan Chase; NEW AMERICA LENDING; Intrepid Capital; Jabor; NHIG; JCXL; Alfardan; RJ Lumba; William Hoyle; Worldwide Financial; Stratos Commercial, Tesiina PAINTER; Warren John, Borgenson; Kabah family; LIBERTY WEST Regional Center; Vision Partners; Trinity; Blumberg; Whitestone, Lex Gubsky; Ken Shepherd; MULTIFUNDING; Utica Leaseco; Reich Bros; Viking Equipment Finance, Jim Buckingham; RAM Consulting, Richard A MILLER; DelMorgan, Robert FINKELSTEIN; Moise Anglade; Fiera Comox; Barings; FRACTAL Advisors; Black Lake Capital; Summit Partners; Summit Investment; NBH Banks; Great Western Bank; Currency Capital; Dynamic Capital; Al Mal; Kennedy Financial; Commercial Finance Partners; Capital Source Group; Ag America; World Business Lenders; Axos Bank; Patriot Funding/David Antonelli; Capital Markets Expert; Johnston-Todd; Business Capital; SouthStar; AgAmerica; Capstone Trading; AAY Panama; Credit Lyonnaise Laing/Michael Kurtanjenk; Coco Capital; SOLE SOURCE Capital; Mayfield VC; Legendary VC; VII Capital; Vendome Bond; Songbird UK; Liquid Capital; Lantern Capital Advisors; Key and Company, David Key; JCXL; Jack Burstein; Zayid Mohammed; Isaac Capital; Interstate Capital; INSIGHT Network; Holistic Impact Partners; Harvest Returns; Fisher Enterprises; Equilibrium Capital; Centerboard Group; Farm Enterprises, Margie Costamanga; Brereton Hamilton; Elkehereiji; HIG Capital; Riverside; Armonia, Jasper VAN BRAKEL; Manna Tree; Crystal Lands Resources; Crestnorth Capital; Conterra; Correlation VC; Ethan Blum; Charles

Blair; Big Path Capital; BANCO Advisors; Auctus Capital; Armgold Harmony; Arlon; Alam Junaid; Hurwitz Financial; Silverwood Partners; Firelake Capital; Fountain Partners; Ridgestone; Chess Capital Partners; Endeavor; Republic Business Credit; Loan Whisperer; LeaseQ; Falcon Investments; CFA Omaha; Hawthorne Equity Partners; LNK Partners; MSTCPT; KLC Financial; Land O Lakes; BBVA; Ranch Creek; Hillstar Capital; AGR Partners; High Street Capital; C6 Capital; MetLife; Ag Lending Group; BMO; Arizona Bank and Trust; Bank of Tucson; Wells Fargo; Liquid Capital Express; FSW; Paramount Payment; Grand Canyon RC (EB-5); Prudential; United Financial Investment Group; Broadmark Capital; Zions Bank; Green Card Fund; TTM Capital; London Manhattan; Crucible Capital; Roth Capital Partners; Trianz; Citi Financial Group; Clarke Advisors; Noble Business Lending; Funding Merchant Source; Crowd Fooding; AgFunder; Prosperity Funding; Business Backer; YA Capital; Altima Partners; JACKSON Consulting Group; IPO Capital UK; Premier Financial Services; Commerce Bank Arizona; Merchant Finance; GUD Capital; Lynwood Capital; Headwaters Merchant Bank; Pinnacle Ventures; LGV Partners; New Star Financial; SJF Ventures; Farwest Capital; Resource Land Holdings; VN Partners; Cobank; Huron Capital; BLC Lending; Brickell Financial; Siena Lending; FCP Capital; DB Capital Solutions; First Capital Business Finance; Midland American Capital; Black Coral Capital; Olin Capital; US Capital Partners; SuperG Funding; Modern Capital Solutions; Brightway Financial Group; Sherbrooke Capital; WGIM Global; FS Equity; Point Financial; Clarion Partners; Biltmore Bank; Wall Street Strategic Capital; Nations Equipment Finance; MARV Capital; Fire Lake Capital; Perella Wasserstein Partners; Lycom Financial Group; Farwest Capital; Comerica; Mainstreet Capital; TDP Fund; Farmland LP; Blue Leopard LLC; SCS Dynamics; Don L Wood; Open Prairie; Chase Winters; New Seed Advisors; Bahraini Investment Group; Biz2Credit; American United

Capital; Vertex Financial; Phoenix Global Finance; Brahma Lending; West Monroe Partners; Lucid Solutions; Popular Commercial; ITBMS Global; BIBBY Financial; Bradley Gibson; CROSSROADS FINANCIAL; MB Financial; BLACKPOOL (various entities); SHEFFORD (various entities); Priority Funding; and various unknown Canadian broker and investment banker entities, typically doing business related directly or tangentially to the Vancouver Stock Exchange and with offices in the Vancouver, British Columbia area.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4-14
Complaint paragraphs:	226, 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0039, 2-0047, 2-0053, 2-0054, 2-0059, 2-0171, 2-0173, 2-0179, column entitled Actions: Destroy Career, Businesses; Pretext, Entrap, Incriminate 2-0165 through 2-0179
LPEE pages (see technical note on page numbering at paragraph 230):	See Compendium at LPEE pages 934-1075 for selected relevant emails and documents related to each entity and individuals named in this subcount. Full documentation to be provided in discovery.
Emails and documents by topic and date, also located in LPEE:	<p>AAY Investments Panama Info Form PO Fin \$3MM SBI AAY CIS – 2020 Completed 200306.pdf</p> <p>AgAmerica Reiten Big Sandy loan re pers gty issues 210304,</p> <p>AgAmerica attempt Miles Reiten Big Sandy pers gty 210322,</p> <p>AgAmerica Miles Reiten 210415,</p> <p>AgAmerica Reiten sked call 210707,</p> <p>AgAmerica Carson re WMT organic sales progress 210716,</p> <p>WCC AgAmerica Land Loan Application FL 3MM 190730.pdf</p> <p>Alam Junaid ibanker too busy AZ 160419,</p> <p>Alfardan Carr ref investor Prince Omar Alfardan 160404,</p> <p>Alfardan loan proposal accepted 160512,</p> <p>Alfardan decline due to advance fee rqmt 160627,</p> <p>Al Mal Capital KYC 181025.pdf</p> <p>Al Mal Capital signature page on This PC drive 181120.pdf</p> <p>AltaVista Investment Commitment- Winnett Perico, Inc. 161010,</p> <p>AltaVists faked fin 161017,</p> <p>AltaVista fup 161018,</p> <p>AltaVista key personnel intro 161018,</p> <p>AltaVista SULLIVAN re bad actor 161018,</p> <p>AltaVista WP due diligence on AV 161018,</p> <p>AltaVista fake followon funding anncmnt 161025,</p> <p>AltaVista update 161026,</p> <p>Anglade FL investor 150811,</p> <p>Anglade FL investor update PHX trip date 150817,</p> <p>Anglade FL investor cancel PHX trip date 150910,</p> <p>Armgold Harmony Vusimile on seed funds investor 141211,</p> <p>Armgold Harmony Vusimile funds notice email 141215,</p> <p>Armgold Harmony Vusimile funds notice recvd 141215,</p>

	<p> Armgold Harmony Vusimile funds notice 141216, Armgold Harmony Vusimile delay discussion 141218, Armgold investor interest 160412, Armgold affirms investor interest 160418, Armonia VAN BRAKEL re poss SLC mtg 170807, Armonia VAN BRAKEL 170810, Armonia NYC VAN BRAKEL on grass fed other options 170822, Armonia NYC vanBrakel MacGill mtg 170926, Armonia Mtg Delay 171016, Armonia NYC mtg 171107 invite 171021, Armonia VAN BRAKEL on Rabo referral 171204, Armonia VAN BRAKEL Rabo referral 171204, Antonelli refers World Bus Lenders 2point5MM WCC WBL Application 190508.pdf Auctus on Skaar DD 170822, Auctus Confidentiality Agreement 10119 Auctus Subpoena re CORNHUSKER Poaching Illegal Search Pretext 10126-10131 AZ Foreign Corp Signed 150825 WINNETT PERICO, INC. AZ QUALIFICATION 150825.pdf BA BESTWICK CARDONE BAML-Natural Food Symposium (2017) 170524.pdf BANCO Advisors ref from GOTTESMAN 171011, BANCO Advisors Nov 1 mtg w Nicholas 171021, BANCO Advisors 171101 mtg Blitch re pitch 171024, BANCO Advisors 171101 busted mtg fup NICKLESS 171102, BANCO Advisors Blitch Vindiola WASEMAN invite 171114, (see also LPEE page 1074V, entries 11/1/2017) BANCO Advisors re other intl investors 171130, BANCO Advisors China drag out 171206, Bankers Capital ref to Riverside Marcks 210624, Barings WinnettOrganics Barings Presentation 170107.pdf BIBBY 1MM AR Line WCC Signed Proposal for Winnett Cattle Company, Inc. 180320.pdf BIBBY WCC Signed Proposal for Winnett Cattle Company, Inc. 180320.pdf Big Path ping MA D Patrick Bain 170823, Big Sandy Ranch sub debt RFQ 210314, Bk Tucson Lender re S-1 and banker due diligence 151025, Bk Tucson Lender re Brewer bio red flag issues for lenders 151030, Bk Tucson Lender re Brewer bio red flag issues for lenders 151102, </p>
--	--

	<p> Bk Tucson Lender re S-1 and banker due diligence 151103, Black Lake Capital ref FRACTAL perhaps 180216, Black Lake Capital re capital rqmts 180227, BLACKPOOL 20MM WinnettOrganics Term Sheet Executed 170202.pdf BLACKPOOL Private Placement Offering Doc Winnett 150618.pdf BLACKPOOL SHEFFORD Consulting Agreement \$1MM WinnettOrganics Fully Executed 161129.pdf BLACKPOOL Bridge Loans Brochure 10138-10156 Blair bogus lender 170418, Blair 17mm fin proposal 170419, Blair bogus lender 170419, Blair bogus lender 170420, Blum re mtg to discuss finders fee arrangement 130327, Blum Signed Agreement Blum 130620, Brickell Fin FL referred to ADAMSON 150910, Broadmark WA 150717, Broadmark re Lake County fin 210704, Broussard re Lake County fin 210710, Caasmailaffairs Morocco Investment for WILLIAMS R 140918, Capital Markets Expert WCC Submission Policy w. agent CME 190729.pdf Capital Source Group App 190325.pdf Capital Source S Gordon 210316, Capital Source S Gordon 211015, Capstone Trading re fin 210831, Capstone Trading re fin 210901, Capstone App 200110.pdf Capstone Term Sheet 11MM Trade Finance Line 200401.pdf Case Champoin rep re funding options 170328, Case intro Dickens PVG Global re financing 170328, Centerboard Grp as Investor 170517, Centerboard Grp as Finder DD 170526, Centerboard PE intro 170526, Cerebro Capital on Big Sandy Ranch 210317, Chardan SPAC overview (June 2017) - \$50 MM (Sponsors) 160601.pdf Chardan SPAC overview (June 2017) - \$50 MM 170601.pdf Blum Signed Agreement Blum 130620.pdf Chase phone intro appt 210402, </p>
--	--

	<p>Chinese money laundering scam email 161219, Chinese AR money laundering scam attempt 220218, Coco Capital 2 LA NYC re sub debt 151002, Coco Capital LA NYC re sub debt 151002, Coco Capital on loan availability 161015, Coco Capital on status 161130, Coco Capital on status incl WMT 170103, Coco Capital connects others 170104, Coco Capital STRASSER re connect results pass 170104, Collins ref by SULLIVAN on Bridge Loan 150629, Commercial Finance Partners App 190319.pdf Commercial Finance Partners App Acct Rec Suppl 190319.pdf Conterra IA brdige loan term sheet Skaar 170509, Correlation VC are followon investors 170328, Crestnorth Capital disbursement instruction 140327, CROSSroads PO Fin 750K Winnett Cattle Company - Signed Proposal 180331.pdf Crystal Lands Resources 150924, Crystal Reosurces Xfr 150928, Crystal Resources Xfr Fail 150928, Crystal Resources XFR Fail to Smith 150928, Crystal Resources Fee Scam 150929, WCC 420K App Currency Signed Verification Form - Currency 2016 180323.pdf Dynamic Capital App Signed Winnett Dynamic App 180620.pdf DD re Rabo ID Skaar 170503, DD Skaar Site Plan Barns Winnet Site Opt 8 170509, DD Transom re Skaar 170512, DD Fleming on DD Finl Model 170526, DD Callahan (KEENE) re PE dilutive 170531, DD Skaar Site Plan 170605, DD Skaar PE Investor Bid email 170607, DD Skaar PE Investor Bid form 170607, DD re Centerboard Housing Solution WO 170608, DD WCC teaser draft 170608, DD Skaar Organic Fertilizer Production Cost 170609, DD Callahan (KEENE) re funding sked 170612, DD Skaar Organic Fertilizer Advantages 170614, DD WCC Pitch Deck Skaar etal 170614, DD Callahan (KEENE) on DeSai 170616, DD Skaar Biiding Process to SANDERS 170616, DD Callahan (KEENE) on AXIAL lead Chatham 170619, DD Skaar Site Plan Mods 170619, DD NGEN fake NYC investor 170622,</p>
--	---

	DD NYC VAN BRAKEL 170622, DD Callahan (KEENE) re AGIS NDA cmu not credible 170628, DD Skaar AgIS Boston 170628, DD Skaar Advantage NDA 170628, DD Skaar AgIS Boston 170628, DD Callahan (KEENE) re Skaar visit sked 170726, DD on HIG Capital Miami 170728, DD Skaar site visit Sander 170728, DD JJU - Winnett Cattle Target Tracker <u>8_4_17</u> 170804, DD Skaar BDO Auditor SLC Gordon 170804, DD Skaar BDO Auditor SLC Gordon 170807, DD NYC Callahan (KEENE) connects to BDO SLC 170808, DD LABELLE Teton County 240 Tour Pass 170810, DD Skaar LOI xmit 170811, DD Skaar LOI signing 170821, DD Skaar past contacts 170821, DD Skaar Teton River Farm Feeney email 170822, DD Skaar rcv Alt Offer 170828, DD Skaar Teaser 170905, DD Callahan (KEENE) re no progress 170906, DD Skaar Kritser 170907, DD Skaar Kritser to WO team 170907, DD Skaar SANDERS on Kritser alt structure 170915, DD Skaar Kritser re adjusted LOI 170919, DD Callahan (KEENE) on failure to date and breach 170920, DD Skaar Kritser 170921, DD Skaar Sander re Kritser 170921, DD Skaar Kritser 171002, DD Skaar Kritser string out 171004, DD Skaar SANDERS re Kritser Friona Ind ExCEO call 171022, DD Skaar WMT China ND Rep Sr Legislator BANCO Advisors 171024, (see also LPEE page 1074V, entries 11/1/2017) DD Skaar Kritser dragout decline to WO team 171110, DD Skaar Revised Buyout 171112, Deeken re financing 200710, DelMorgan re intro 160925, DelMorgan email WP proposal 160928, DelMorgan fup DD declines to share 160929, DelMorgan update WMT 170106, DelMorgan 170110, DelMorgan re DD engagement 170308,
--	---

	<p> DelMorgan re alt retainer arrangement 170324, DelMorgan revised docs170324, DelMorgan re alt firm retainer avail 170327, DelMorgan nogo on alt fee provider 170404, DelMorgan on DD Callahan (KEENE) telcon 170822, DelMorgan 160928 Engagement Summary - WinnettOrganics.pdf Dooley Hook to EB-5 110922, EarlyBirdCapital SPAC Overview - June 2017 v3 170601.pdf Edgar Wood on Dubai Trip Sched 150626, Elkhereiji Assistant referral 150410, Elkhereiji Loan 150412, Elkhereiji Reponse 150412, Elkehereiji Increased Loan Amount 150421, Elkhereiji Agreement Meeting150430, Elkhereiji Wood Edgar on trip cancelled 150626, Energy Bank Ghana Kabah xfr bank info 170425, Equilibrium Capital cold email on online article 170628, Equilibrium Capital referral to Haladay 170706, Equities dot com Financing Proposal 160623, Equities dot com Financing contract 160630, Equities dot com implementation sked 160708, EquityNet Profile Interest 150520, EquityNet Profile up 150520, Factoring Rec Financing Fees 160217, Fargotrust Investor ND interest in PPM 151010, Fiera Comox Corbett initial hit 210511, Fiera Comox Corbett Big Sandy structure revision 210519, Fiera Comox Corbett Big Sandy returns issues 210520, Fiera Comox Corbett decline 210520, Figdor Drew Paris investment banker 160712, Fisher Ent NYC re 60MM funding 160701, Flores on funds raise 160705, Flynn re additional capital 200730, Flynn re Lake County fin and DB prior WMT China issue 210714, Signed Focus Acquisition-Winnett Cattle NDA 170710.PDF FRACTAL re initial contact 171117, FRACTAL progress 171206, FRACTAL on status and nterest 171221, FRACTAL intro Black Lake Chad Scripps 180117, FRACTAL ROZNOWSKI Executed Agreement1-17-18 180117.pdf </p>
--	---

	<p> Fundable re fin after zero leads dev for WO 171211, Funding options Patriot Antonelli 200720, Gaines Ira AZ first contact ref by Sayre Tappen 150311, Gibson 8plusMM BGibson WCC LOAN Contract 180901.pdf GOMEZ Dir Food Safety Intvw 150829, GOMEZ refers Brereton Hamilton 160407, GOMEZ re investor call request 160408, GOMEZ re investor interest 160427, GOMEZ on Costamanga mtg plan 160429, GOMEZ update on CA investor progress 160506, GOMEZ Costamanga mtg request 160508, GOMEZ re new investor leads 160512, GOMEZ investor update 160525, GOMEZ re Japanese Inv Lead sales progress 160616, GOMEZ update Kevin investor 160704, GOMEZ re Costamanga mtg 170203, GOMEZ re Brereton has organic cattle in TX 171228, GROSS re Korea beef pgm finance 210115, GROSS re Big Sandy finance 210506, GROSS re grainfed organic taste difference 210513, GROSS 210514, GROSS re Big Sandy rewrite Bus plan 210517, GROSS re mkt research to demo our case 210519, GROSS on organic mkt update 210522, GROSS re organic beef proof of concept 210603, GROSS re WMT Redfield US Grocery SVP 210618, GROSS re Lake County tax advantages opptny zone 210630, Grt Western Bk local takeover visit 151117, GWB Pagel re Financing 160216, GWB Pagel re 7500000 LOC 160222, GWB line announcement to team 160223, Harvest Returns Debt Opptny Zone 210623, Harvest Returns 210701, Harvest Returns Cattle Notes Decline 210709, Harvest Returns Lake County Due Diligence 1of2 210709, Harvest Returns Lake County Due Diligence 2of2 210709, Harvest Returns 1 cattle notes 210720, Harvest Returns 2 Cattle Notes 210720, Harvest Returns Cattle Notes SBI team email 210721, Harvest Returns checkin 210909, Hillcrest PE IL interest 180112, Hillcrest pass IL 180115, Hitoshi Investment \$3MM Fully Executed NOGUCHI HITOSHI 190714.pdf </p>
--	---

	<p> Holistic Impact intro 170404, Holistic Impact fup 170415, Holistic Impact fup on prospectus distn 170503, Hoyle Finl Intro 140216, Hoyle Fee Agreement Signed 140221, I banker BreretonHamilton 160407, I banker BreretonHamilton 160412, I banker BreretonHamilton 160718, Interstate Commerce WMT KR emails 170403, Intrepid Capital DC reprise 221011, Intrepid Capital Fees 12K Invoice 1 200225.pdf Intrepid Capital Sheldon Beef Intrepid NC-NDA Completed 200220.pdf Intrepid Capital Sheldon Beef Intrepid NC-NDA Completed Screenshots 200220.pdf Investor Commitment Crystal Resources 150924, Investor Commiment Fail to Smith re Ukraine Xfr Fail 150928, Investor Commitment Crystal Resources Xfr 150928, Investor Commitment Crystal Resources Xfr Fail 150928, Investor Commitment Crystal Resources Fee Scam 150929, Investor Contact List Sent to WYLY 130712, Investor Lead GOMEZ re CA 160322, Investor Lead fup GOMEZ 160331, Investor Prince Omar Alfardan 160404, Isaac Capital Grp NYC investor interest 170515, 151021 Jabor Qatar MEC Application for JV License - Jabor 100108-10110 151027 Jabor Wire Transfer \$9975 for MEC License 10111-10113 151027 Jabor TD Ameritrade Wire Transfer 10114-10118 JACKSONCG Frambes TX 161205, JCXL Advance Fee Scam Barrister140602, JCXL Term Sheet 10MM 140609, JCXL Term Sheet 10MM JACKSON SULLIVAN 140609, JCXL Advance Fee Scam 140611, Johnson Todd Approval letter to Loaning 2.8MM 190729.pdf JPM Aberbach ref to another unit 210604, JPM Kolleng re China LC monetization 210131, Kabah scam resurrection 140424, Kabah first hit 140526, Kabah funds xfr 140605, Kabah Energy Bank Ghana 180K 170425, Kabah Energy Bank Ghana 180K 170426, </p>
--	--

	<p> Kabah Energy Bank Ghana Govt Doc Forged 180K 170426, Kabah Energy Bank Ghana 180K 170427, Kabah re Energy Bank xfr 170428, Kabah Energy Bank Ghana 180K 170502, KEISER 100MM Debt Raise Terms Summary 151104, Kennedy Orrego intial hit 141110, Kennedy Funding LOI Turpin 2pt5MM 190708.pdf Kennedy Funding WCC Completed KFF_Executive_Summary_Fillable_Levitt NEW 190529.pdf Key NYC ibanker reconnect 170821, King Trade Capital re WMT order thru JBS 170824, Kofi on Ghana AKOTO contact via Yahoo Messenger 170314, Kolleng JPMorgan prob cutout 210115, Krapf Bank Tucson Land Financing Inquiry 160213, Kritser re Lake County OR Organic Finishing Op 220621, Lantern Capital Advisors Risey re raise financing 111007, Lease Co Van Tassell 161102, LIBERTY EB-5 initial hit 141027, LIBERTY KELLER CARTER mtg thanks 141103, LIBERTY EB-5 WinnettOrganics LOI 11-12-14 141112, LIBERTY CARTER ref request services matrix request 141114, LIBERTY re CADC TEA eligibility 150106, LIBERTY backout excuse sent to UFIG 150505, LIBERTY EB-5 LOI to WP 221105, LIBERTY EB-5 Contract Annotated 141112.pdf LIBERTY EB-5 LOI .pdf LIBERTY EB-5 LOI 141112.pdf LIBERTY EB-5 LOI WinnettOrganics LOI 11-5-14.pdf Liquid Capital AZ GOTTESMAN initial hit 170928, Liquid Capital AZ GOTTESMAN signed app 171012, Liquid Capital AZ GOTTESMAN on underwriting info request 171012, Liquid Capital AZ GOTTESMAN underwriting info complete 171013, Liquid Capital AZ GOTTESMAN email DLC sample 171017, Liquid Capital AZ GOTTESMAN 171101 mtg request 171024, M GROSS re Korea contract finanaicn g et al 210119, MADISON STREET Capital MSC Agreement-Winnett Cattle Co, Inc. 180405.pdf MAGGARD TX re ABDELSAYED 200722, </p>
--	---

	<p> MAGGARD TX re ABDELSAYED start date 200817, MAGGARD TX status 201015, MAGGARD re Korea Angus pgm etc 210118, MAGGARD re 26 Ranch and ABDELSAYED 210221, MAGGARD on ABDELSAYED positive connect 210222, MAGGARD re ABDELSAYED 210302, MAGGARD re ABDELSAYED to Egypt 210304, MAGGARD on loan docs PFS need 210306, MAGGARD re gty and PFS 210307, MAGGARD re Big Sandy BAFO 210322, MAGGARD re Big Sandy reprise 210505, MAGGARD re investors and Big Sandy 210519, MAGGARD re Lake County LOI 210701, MAGGARD re Lake County 210702, MAGGARD re 500k loan 210703, MAGGARD enroute Lake County 210707, MAGGARD re Lake County enroute 210707, MAGGARD re Lake Copunty tour and plus minus issues 210709, MAGGARD re Lake County and pers FICo improvement 210715, MAGGARD re Lake County 210719, MAGGARD Loan to DB improving FICO 210721, MAGGARD re Lake County 3559 LOI 210721, MAGGARD on Lake County Fin snags 210725, MAGGARD on WMT Wagyu comp price and other status 210804, MAGGARD re startup sequencing plan 210816, MAGGARD re status web dev sales 210816, MAGGARD re add subs WEFUNDER 210817, MAGGARD re GAAP fin need 210818, MAGGARD re mkt gap 210818, MAGGARD 5k GPR loan 210826, MAGGARD re 4500 loan recvd 210826, MAGGARD Revised GPR Startup Plan 210830, MAGGARD re DB overadvance 210901, MAGGARD re loan not pursued 210903, MAGGARD re 26k loan 210909, MAGGARD re ICPO LOI-FM-LZ-210913, MAGGARD re Terminating Trader efforts 210916, MAGGARD re status 211104, MAGGARD re 700 211221, Manna Tree update WMT organic beef pgm sales progress 210702, Mbazock Kelvin French Investment firm 140219, Mbazock Kelvin 140220, </p>
--	---

	<p> Montminy Les Allan re investors 200724, Mubadala Capital UAE Investment 140624, Mubadala SULLIVAN on FCPA violation 140715, MULTIFUNDING initial hit 141215, MULTIFUNDING Paul Avery initial contact 141215, MULTIFUNDING SULLIVAN re referral to David HUGHES 150130, MULTIFUNDING Dan KREWSON initial contact 150915, MULTIFUNDING referral Shepherd 161018, MULTIFUNDING referral Shepherd has target 161208, MULTIFUNDING referral Shepherd refs Lex 170120, MULTIFUNDING re Whitestone Lex Gubsky Phil 170123, MULTIFUNDING Shepherd Whitestone Gubsky email 170125, MULTIFUNDING re eqpt loan 170126, MULTIFUNDING Shepherd Intro Whitestone Lex Gubsky 170127, MULTIFUNDING Whitestone Lex Gubsky term sheet deadline 170130, MULTIFUNDING Conf call fup 170131, MULTIFUNDING Whitestone Lex Gubsky confirms interest 170131, MULTIFUNDING Whitestone Lex Gubsky casting doubt on other deals 170201, MULTIFUNDING Shepherd Whitestone Gubsky update email 170206, MULTIFUNDING re Utica eqpt leasing 170210, MULTIFUNDING re broker fee on Utica eqpt leasing 170222, MULTIFUNDING re Utica eqpt lease LOI 170222, MULTIFUNDING Shepherd BLACKPOOL progress delay 170309, MULTIFUNDING re Moore defame Whitestone Lex Gubsky 170310, MULTIFUNDING Moore defame Whitestone Lex Gubsky 170311, MULTIFUNDING re BLACKPOOL fail DD retainer needed 170323, National Livestock cattle financing 170820, Natnl Livestock re fin MO organic cattle 200817, New World FL 170410, New World FL 170428, NEWMAN 2014 Master DRF Completed 140424, NEWMAN AA NDA GNA Signed 140424, </p>
--	---

	<p> NEWMAN Gerald agreement via Inder Singh 140424, NEWMAN Gerald Inder Singh re Bridges not confirm orders 140425, NEWMAN re 2MM proof of concept 140425, NGEN GRUBSTEIN re Organic beef pigs 210521, NGEN and Correlation VCs 210522, NGEN update 210604, NGEN next round 210607, NHIG Firm Insurance re payment bond 140821, NHIG Songbird Niles re bond invoice nonpayment 140917, NHIG Hong Kong Financing Signed 140801.pdf NorthwestFCS Rayl re Lake County fin 210712, NY Business Capital App 190730.pdf NY Business Capital App is digitally signed at the original 190730.pdf NYC Investor AXIAL Conf Intro PWP Growth Schectman 151028, NYC Investor from AXIAL Formanek 151027, NYC Investor Seth investors 150818, NYC Investor Seth re eqpt 150901, NYC Investor Seth re eqpt detail 150911, NYC Investor Seth re eqpt losn progress151001, NYC Investor Seth proposal 151016, NYC Investor Seth re Jabor and 300mm loan terms 151019, NYC Investor Seth re fee waiver 151021, NYC Investor Seth signed MARV capital agreement 151023, NYC Investor Seth on status 160203, NYC Investor Seth on equity investor interest 160208, NYC Investor Seth on closing 7MM investment 160219, NY PE Firm Ref by DD OGrady Signed Project Feedlot NDA 170710.PDF Oppy Vancouver BC broker re financing rqmts 170331, Paine Schwartz contact 171116, PAINTER TX earlier ref from WorldWide Fin 200730, PAINTER TX on WCC collapse 200730, PAINTER TX wants exclusivity also WWF cc on this email 200803, PAINTER re ABDELSAYED gty 200811, PAINTER re Ibdelsayed gty 200811, PAINTER TX re loan fail income 200825, PAINTER re Galkin telcon 200831, PAINTER re Korea finance 210115, </p>
--	--

	<p>PAINTER re Lake County 550K need and WMT progress 210703,</p> <p>PAINTER re Lake County 500k loan purpose 210705,</p> <p>Paris I Bank interest 160712,</p> <p>PDX Investor cold email on online article 170628,</p> <p>PDX ref to Haladay 170706,</p> <p>PE reaction1 to Big Sandy offer 210525,</p> <p>PE reaction2 to Big Sandy offer 210525,</p> <p>PE reaction3 to Big Sandy offer 210525,</p> <p>PE reaction4 to Big Sandy offer 210525,</p> <p>Perer Super G Funding 151020,</p> <p>Pitch Deck to RAM WinnettOrganics Notes 160328,</p> <p>PLM coop fin for beef 200821,</p> <p>Priority Funding 5point6 MM WCC PFS-Application 180919.pdf</p> <p>Pruska investor 161128,</p> <p>Pruska investor 161129,</p> <p>PWP update 160928,</p> <p>RaboAg Kemp re Arlon Podzemny Perico 130203,</p> <p>Rabo on Oliver Direct funding 160721,</p> <p>Raboag Pitcher re Skaar review 170429,</p> <p>Raboag Wilson TX 170531,</p> <p>Rabo on organic fruits and veg mkt outllok 170822,</p> <p>RAM initial meeting set 160325,</p> <p>RAM private placement interest 160326,</p> <p>RAM mtg sked 160330,</p> <p>RAM Call Summary re financing strategy 160425,</p> <p>RAM investor progress 160426,</p> <p>RAM on Olin engagemennt ltr 160427,</p> <p>RAM Olin update 160430,</p> <p>RAM re sales POs 160430,</p> <p>RAM re Maines 160503,</p> <p>RAM call to update RAM progress 160505,</p> <p>RAM contract redline draft 160509,</p> <p>RAM update 160526,</p> <p>RAM re progress and concerns 160527,</p> <p>RAM re progress and sales lead 160604,</p> <p>RAM re sales leads progress 160609,</p> <p>RAM re accredited investors 160612,</p> <p>RAM on financing progress 160629,</p> <p>RAM inital referrer reconnect 160708,</p> <p>RAM on CS sales mtg 160711,</p> <p>RAM Olin Termination Notice 160718,</p> <p>RAM inital referrer reconnect 160720,</p> <p>RAM Olin Capital Accepts Termination 160722,</p> <p>RAM re DD Clark Mckenzie 160809,</p>
--	---

	<p> RAM temriantion no results 160907, RAM continues work 160911, RAM Investment Priorities 160911, RAM connects ARPAIO ACTS freedom farms 160913, RAM on Hinson ACTS Freedom Farms 160914, RAM re ground lease and beef investor iinterest 160914, RAM re CS apptmt attempt 161027, RAM CS reqmts 161028, RAM CS 161103, RAM CS stall 161108, RAM stall family emergency 161109, RAM conv produce fail 161121, RAM on conv produce contractual issues 161205, RAM re conv produce agents sales progress 161215, RAM failure on conv produce and lack of notice 161221, RAM litigation threat 170228, RAM demand notice 170401, RAM final demand 170401, RAM on final demand from SULLIVAN 170406, Reich Bros \$3pt5MM Lease ref Buckingham 190612.pdf Resorce Land Holdings CO reconnect 180213, Revolution VC Interest HUGHES 160825, Revolution VC Feedback HUGHES 161019, Revolution VC Feedback HUGHES2 161019, Richards Sarah DB Headhunter 080630, Riverside re investment opptny 210607, Riverside founder Kohl re investment opptny 210611, Riverside Kohl CoCEO re financing turndown 210611, RJ Capital Flynn re additional capital 200730, RJ Capital Flynn re Lake County fin and DB prior WMT China 210714, RJ Lumba CV 12.2012 121201, RJ Lumba Starbucks Ramsey following day 121211, RJ Lumba Ramsy Xmas Deutsche Bank Ibanker fup 121216, RJ Lumba no response 130208, Rostra 300K Notes Term Sheet no signature reqd.pdf Roth on S-1 160124, Salm Ben Promissory Note 131204, SeedInvest Winnett Perico, Inc. Engagement Agreement 170509.pdf Seth MARV Capital xmit of PPM S1 151124, Sherbrooke re LA organic mkt 140409, Sherbrooke re sales backlog 140411, SOLE SOURCE cold email hit 171219, SOLE SOURCE feedback 171222, </p>
--	--

	<p> SOLE SOURCE call 171226, SOLE SOURCE NDA Double D feedyard 171227, SOLE SOURCE TURNER phenom news HEC etc 180105, SOLE SOURCE TX feedyard options 180105, SOLE SOURCE TURNER mtg invite StRegis NYC 180108, SOLE SOURCE TURNER re NYC mtg 180108, SOLE SOURCE mtg fup NYC 180109, SOLE SOURCE mtg in NYC 180109, (see also LPEE page 1074V entry 1/9/2018) SOLE SOURCE TURNER at mtg StRegis 180109, SOLE SOURCE mtg results to NICKLESS 180110, SOLE SOURCE 180111, SOLE SOURCE update TX 180119, SOLE SOURCE 180121, SOLE SOURCE Check by outsider 180122, SOLE SOURCE re WMT China added opptntys 180123, SOLE SOURCE on string out 180125, SOLE SOURCE hold cmu to Gearn 180126, SOLE SOURCE repeat decline 180228, SOLE SOURCE TURNER on Big Sandy 210507, SOLE SOURCE TURNER on feed price sensitivity 210601, SPAC Early Bird 170626, SPAC EB Dennis Brewer - \$100mm SPAC Illustrations 170626.pdf, SPAC Chardan 170627, SPAC Chardan ref LOEB NUSSBAUM 170629, SPAC NUSSBAUM LOEB atty 170629, SPAC NUSSBAUM LOEB appt reset to 170711, SPAC Chardan mtg fup 170712, SPAC EB mtg fup 170712, Summit Partners on Skaar 170511, Summit on CO feedyard 171223, Summit connects NBH Ag bank 180111, Summit re distressed deal E-6 feedyard 180215, Summit on E6 distress sale 180223, Summit own capital must have 180228, Signed Tawfeek Chiang standard agreement form filling 140227.pdf Trinity AZ expression of interest 160930, Trinity re AltaVista 161014, Trust Capital re bridge loan 210719, TURNER on Feedyards and Deloitte Earnings review 180111, </p>
--	--

	<p> TURNER re TX feedyards status 180121, UFIG Loan conf call 141107, UFIG LOI Adding Eqpt to Loan Amt 150107, UFIG Fin Inquiry Land for Stock Kingman RHODES 160216, US Capital Partners Ritter 150409, Utica Signed Winnet Proposal 2-21-17 170222.pdf VC Legendary 210115, VC in-house fake pitch Blumberg 210817, VC in-house fake pitch Mayfield 210817, VC Mayfield 210817, VC Blumberg 210818, VC Mayfield feedback 210818, Vendome Bond re financing interest 130513, VII Capital reply 210506, Vision AZ re Lake County fin 210709, Vision AZ re Lake County fin 210728, Vision AZ re Lake County fin 210813, Warren John intial hit 140827, Warren John London 150403, Warren John INVESTMENT AGREEMENT New-2 Signed 140829.pdf WHoyle Fee Agreement Signed 140221, WHoyle Fee Agreement Signed 20140221150230580 140221.pdf, Winters Referral from WYLY 111101, Winters on Earnout 111123, Winters on Fund Closing 120225, Winters extends 120601, Winters re set bridge loan appt time 130104, WO Status Report ADAMSON PPM 150917, WO Team re PPM S-1 processes 150921, WO Grt Western Bk local takeover visit 151117, WO Team on Jabor Funded on Time 151117, WO Team re Jabor snag 151118, WO Team on financings 151120, WO Team on 179mm Financings 160101, WO Status Financings 160121, WO Financings deal status to team 160208, WO Status Kingman Startup Financings 160209, WO Status Report financings 160421, WO Status re Oliver Term Sheet Verbal 160719, WO Status Final Oliver Hyder present sked 160804, WO Status Hyder Oliver rework 160818, WO Status DD Fin Sales 160929, </p>
--	--

	<p> WO Status Report on Hyder Oliver new pitch status 161006, WO on WMT progress 161018, WO Status financings 161103, WO Status Financings WMT KROGER 161115, WO Org Chart 170111, WO Blitch re Stockton Hill Famr tour w BLACKPOOL 170203, WO Smith CFO re Revolution VC pass 170203, WO Team re Blackppol to fund 170301, WO Team re BLACKPOOL no reply stringout 170309, WO Team re BLACKPOOL deadline miss 170310, WO Status Report DD retainer need 170320, WO also CARDONE on Status WMT others 170403, WO Status Report Skaar Investor Interest 170515, WO Team on DD Funding Skaar Acq Date 170615, WO Status Report Skaar nothing from Alberts 170706, WO Status Report re DD potential investors 170713, WO Status Report BANCO Advisors busted mtg 171101, WO Status Report re BANCO ND Investors Skaar WMT 171116, WO Status Report new investors BANCO ND pass 171118, WO Status Report re WMT China SOLE SOURCE 180104, WYLY re Winters Delay Response 111114, WYLY re bridge need BLACKPOOL 120921, WYLY early contact 130716, YieldStreet re Lake County fin 210711, Zayid email cc Hewitt London 121008, Zayid Hewitt re Investor Zayid 121008, Zayid email re funds transfer 121014, Zayid Corp JV Agreement 121018, Zayid Signed Subscription Agreement Cancelled 121018, Zayid Inv BANCO Santander App 121115, Zayid FIRST AMENDMENT TO JV 140220, Zayid on attny funding request 140227, Zayid re BofA checking account number 140228, Zayid Attorney Tawfeek Chaing re fee 140301, Zayid re Malaysian Attny Not Confirmed 140305 Zayid 20MM Cancelled Signed Subscription Agreement Cancelled 121002.pdf Zayid Signed JV Agreement121022.pdf </p>
--	---

671. RICO-33 Racketeering Violations: Commercial Frauds: Fraudulent Financings and Litigation - *AUCTUS v. CORNHUSKER*, 2019

A. Defendant Reginald MCGAUGH, acting as a defendant agent, officer, or confidential informant, and part of this on-going conspiracy, represents himself and his firm, defendant CORNHUSKER Capital, as capable of and sincerely interested in, securing financing on behalf of Lead Plaintiff's entities, thereby coordinating with and playing an on-going role during 2019 in a complex sales, production, operations, and financing scheme to deprive Lead Plaintiff and his related entities of authentic opportunities to engage interstate commerce.

B. This color of law swindle required and consumed the time and financial resources of Lead Plaintiff and his business entities in the bad faith perpetuation of defendants' long-running schemes, frauds, swindles and associated-in-fact enterprise pattern of racketeering acts affecting interstate commerce. The \$2,500 retainer required by CORNHUSKER was delivered directly from investor DEAN T. SMITH to CORNHUSKER and is counted as a portion of a \$5,000 loan in January 2019 from DEAN T. SMITH to Winnett. As frequently occurred in his interactions with defendants, the Lead Plaintiff signed the agreement first and never received a fully executed copy of the agreement, though the retainer was represented as received from DEAN T. SMITH and the acts required of defendant under the agreement were represented as being conducted in good faith through communications between the Lead Plaintiff and the defendant(s) as counterparty. But there were absolutely no tangible results as usual as defendants MCGAUGH and CORNHUSKER interfered in and affected interstate commerce. See LPEE pages 10119-10124, 10125, 10158-10164. Relevant emails from March 4, 2018 through July 9, 2020 are currently blocked without warrant by defendant UNITED STATES as this Complaint is being prepared, paragraph 47.

C. Further, defendants ostensibly conducted litigation in Cook County, IL between defendant AUCTUS (founder MCGAUGH) and defendant CORNHUSKER (founder MCGAUGH after leaving AUCTUS) for client poaching by CORNHUSKER of Lead Plaintiff's company, Winnett, from AUCTUS. This requires extensive efforts to comply with a Cook County, IL court subpoena served on the Lead Plaintiff and his company, to spy upon and consume time and resources in this color of law fraud. See LPEE pages 10126-10131, 10158-10163.

D. This is a variation on the usual direct litigation theme defendants have used frequently when attempting to run up expenses and reduce cash flow to plaintiffs of this class. Defendants also attempted this specific approach in the Tower Books bankruptcy case around 2003, in an effort to arrange the Lead Plaintiff's potential avoidance of a lawful subpoena, which can lead to criminal charges for failure to appear and cooperate. And, of course, color of law discovery in "litigation" is an alternate method of spying without warrant. See also other such abuses of the litigation process by defendant UNITED STATES at paragraph 643 RICO-45.

E. This is an element of the now quite the familiar pattern of "sources and methods" used by defendant police powers who violate the Fourth Amendment by alternate means, using pretexted email fraud and wire fraud under color of law to engage in illegal searches, later sanitized as legitimate searches developed through informants and then misrepresented to federal courts to secure legally required warrants to support criminal prosecutions, which themselves are not necessarily based in reasonable suspicion, but rather on the specific targeting and headhunting of particular individuals and entities, which practice defendants UNITED STATES and other police powers defendants have and do repeatedly engaged in bad faith against the rights and interests of Lead Plaintiff and others similarly situated.

F. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4-14
Complaint paragraphs:	643 RICO-45; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0039, 2-0047, 2-0053, 2-0054, 2-0059, 2-0171, 2-0173, 2-0179
LPEE pages (see technical note on page numbering at paragraph 230):	10119-10124, 10125, 10126-10131, 10158-10164
Emails and documents by topic and date, also located in LPEE:	Certain emails are blocked by a defendant UNITED STATES computer hack

672. RICO-34 Racketeering Violations: Fraudulent Financings, Online Platform 2021

A. Defendants WEFUNDER and its officer and employees, through the various entities legally named in the caption, whether acting on their own behalf or as spoofed by other defendants with police powers representing themselves as defendant WEFUNDER personnel and as the actual website while acting as a defendant agent, officer, and as part of this on-going conspiracy, represented themselves, their firm, and their web platform as capable of and sincerely interested in, securing financing on behalf of Lead Plaintiff's entities, thereby coordinating with and playing an on-going role in 2021 and later years in a complex sales, production, operations, and financing scheme to deprive Lead Plaintiff and his related entities of authentic opportunities to engage interstate commerce.

B. This series of frauds and conspiracy required and consumed the time and financial resources of Lead Plaintiff and his business entities. Among defendants' bad faith acts were the refusal to permit the level of return to individual investors proposed for the offering by the Lead Plaintiff; and their role in knowingly recommending an auditor, Alice CHENG, who, after gathering key financial information on their behalf from Lead Plaintiff's company, refused to issue any form of the professional auditor Opinion letter required to complete the financial statements (LPEE pages noted in CHENG emails at subparagraph 672C below), so the fund raising process could be undertaken as planned in conformance with SEC Regulation A+. This scenario played out almost identically to defendants' previous frauds and swindles in paragraph 659 RICO-21 undertaken by defendant ADAMSON Brothers, most probably entirely a fraudulent construction in interference with interstate commerce by defendant UNITED STATES (FBI). This pattern of practice repeated prior fraudulent acts of defendants and effectively killed any possibility of this public financing, thereby, once again, sustaining

involuntary servitude and forced labor control of Lead Plaintiff while interfering in interstate commerce.

C. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4-14
Complaint paragraphs:	659 RICO-21; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	Not applicable
LPEE pages (see technical note on page numbering at paragraph 230):	Not applicable

Emails and documents by topic and date, also located in LPEE:	<p>WEFUNDER MAGGARD as sponsor 210719, WEFUNDER Solicitation fup example 1of55 sent 210719, WEFUNDER MAGGARD re 2k 210720, WEFUNDER LABELLE re mandatory signup to vouch 210803, WEFUNDER GAAP Acctnt CHENG 210902, WEFUNDER start sequence 210903, WEFUNDER GAAP Acctnt CHENG Delays 210907, WEFUNDER re CHENG auditor delay 210908, WEFUNDER GAAP Acctnt CHENG 210909, WEFUNDER GAAP Acctnt refuses Opinion 210909</p>
---	---

673. *RICO-35 Racketeering Violations: Fraudulent Sales Leads 2002-2004*

A. Lead Plaintiff's co-owned consulting company, Allegent, LLC dba Performa, in which he invested \$25,000 cash, provided a personal guarantee for a bank line of credit, and provided professional time and other resources, funded travel and other expenses in 2002-2004 to make sales calls on and submit consulting services proposals to Chelan Fruit, Chelan, WA, a former CNA client, to Bio-Lab, Lawrenceville, GA, both with defendant PRAY in attendance at sales meetings; and to approximately 15-20 defendant Technology Sales Leads (TSL) fraudulent (FBI staffed) sales opportunities across the United States from California to New York to Florida and many states in between (LPEE page 8290 and in evidence handed by Lead Plaintiff to defendant ROSENBERG (FBI) in Fall 2007, also likely in FBI lab archives from its cover mail-in service used in the hard drive recovery, as defendant ROSENBERG FBI was principal human trafficker of Lead Plaintiff from around 1983 to at least 2008). These fraudulent sales calls typically occurred in otherwise empty offices, plants, and warehouses, and required travel, printing, and mailing expenses to respond to fraudulent and non-existent consulting project opportunities presented by defendants, most probably entirely defendant UNITED STATES, to wit defendant FBI. Allegent, LLC dba Performa spent well over \$10,000 for travel, proposal preparation, office overhead expenses, and provided below market compensation to Lead

Plaintiff and his co-managing member PRAY which relationship was legally formalized by Michael LARSON, introduced by John C.T. CONTE, a defendant UNITED STATES (FBI) embed in various roles who professionally befriended Lead Plaintiff during his time at LazerSoft immediately after the departure of defendant STONE from LazerSoft in 1986, and during his efforts to secure additional financing for LazerSoft. Unknown to Lead Plaintiff at the time, his “partner” defendant PRAY was actually directly associated with defendants, specifically defendant ROSENBERG (while both were at NutraSource, among other times) in this “managing member” role and his prior roles while employed with defendant to various predecessor firms (including cover operations). See LPEE pages 140 et al, 844, 6085, 8290.

B. Other evidence is currently inaccessible to Lead Plaintiff but is available on discovery on a computer hard drive image shared with defendant ROSENBERG, known as William Drumm while General Manager of ESTABLISH for North America, unless subsequently destroyed by defendant FBI to obstruct this litigation and justice.

C. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants’ long-running schemes, frauds, and swindles to sustain defendant UNITED STATES’ involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953).

Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4-14
Complaint paragraphs:	673-680 RICO-35-42 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0107, 2-0117, 2-0135, 2-0140
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al; pages 844, 6085, 8290
Emails and documents by topic and date, also located in LPEE:	Tech Sales Leads Revised TSL List 221007.pdf

674. RICO-36 Racketeering Violations: Fraudulent Sales Lead Solicitation Services 2021

A. Defendants fraudulently failed to distribute or prevented the distribution of email correspondence to US persons on a mailing list purchased from EXACT DATA, a marketing list and email deployment service, by a Lead Plaintiff owned and managed entity, Sheldon Beef. This sales lead list and related services were purchased to solicit grocery industry executives and/or retail customers, and, as usual, accomplished no legitimate sales solicitations or results due to defendants' frauds in interstate commerce. Other such services were also purchased from various online services by this and other Lead Plaintiff owned and controlled entities, and also accomplished no authentic results in interstate commerce. This specific \$1065 expenditure in

interstate commerce is shown at LPEE page 10017. Related emails are currently blocked by defendant UNITED STATES.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	673-680 RICO-35-42 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0114
LPEE pages (see technical note on page numbering at paragraph 230):	10017

Emails and documents by topic and date, also located in LPEE:	SBI Team Startup Sequencing Plan 210808, SBI Team on further web slowness ABT sales 210910 Emails are currently blocked by defendant UNITED STATES
---	--

675. RICO-37 Racketeering Violations: Fraudulent Sales Lead Solicitation Services 2021

A. Defendants fraudulently fail to or prevent the distribution of email correspondence services purchased from EGM, a marketing list and email deployment service, by a Lead Plaintiff owned and managed entity, Sheldon Beef, which purchased these services to solicit grocery industry executives or retail customers, and, as usual, accomplished no legitimate sales solicitations or results due to defendants' frauds. Other such services were also purchased from various online services and also accomplished no authentic results. This specific \$4342 set of expenditures in interstate commerce is shown at LPEE pages 140 et al, 10000, 10002, 10014, 10015.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626

RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4-14
Complaint paragraphs:	673-680 RICO-35-42 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0114
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 10000, 10002, 10014, 10015
Emails and documents by topic and date, also located in LPEE:	Not applicable

676. RICO-38 Racketeering Violations: Fraudulent Sales Lead Development Services 2017

A. Defendant TRADEKEY, a Pakistan domiciled company, conspired with other defendants to provide fraudulent contracted sales leads, and submit false sales lead progress reports using wire fraud and contract fraud. This fraud and swindle was an element of the pattern of racketeering act against Lead Plaintiff and his business entities to strip financial resources and authentic international sales opportunities of the company, perpetuating defendants' control and human trafficking of Lead Plaintiff in involuntary servitude, forced labor, and other violations of rights under law and ratified international treaties having force of law at all levels of government in the United States. These fraudulent services cost Lead Plaintiff's company \$6,000 and nearly two years lost for legitimate sales opportunities. See LPEE pages 140 et al, 8290, 9219-9222,

9241-9248, 9275-9276, 9300-9306, 9307-9310, 9340-9391, 9406-9534, 9926, 9984, 9989, 9997, 10004, 10007.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	673-680 RICO-35-42 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0114
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 8290, 9219-9222, 9241-9248, 9275-9276, 9300-9306, 9307-9310, 9340-9391, 9406-9534, 9926, 9984, 9989, 9997, 10004, 10007

Emails and documents by topic and date, also located in LPEE:	TRADEKEY KYC Form Complete 180313.pdf TRADEKEY Orbit Winnett Cattle Company VIP Contract #89779 - C.PDF TRADEKEY Orbit Winnett Cattle Company VIP Contract #89779 180306.pdf TRADEKEY Orbit Winnett Cattle Company VIP Invoice 180425.pdf TRADEKEY VIP Contract #89779 180102.pdf TRADEKEY Winnett Cattle Company VIP Invoice #89779-B 180514.pdf TRADEKEY Winnett Cattle Company VIP Invoice #89779-C 180726.pdf TRADEKEY Winnett Cattle Company Working Report 181010.pdf TRADEKEY Winnett Cattle Company Working Report 181228.pdf Winnett Cattle Company Working Report 181106.pdf Winnett Perico Bill for July 2018 180801.pdf
---	---

677. *RICO-39 Racketeering Violations: Fraudulent Sales Lead Development Services 2018*

A. Defendant WEBLINK.in, domiciled in India, initiated useless web services development in lieu of the actual sales lead development services requested by Winnett, and \$639 was expended before the improperly provided services are cancelled. See LPEE page 140 et al, 9985, 10023.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention

directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953).

Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4-14
Complaint paragraphs:	673-680 RICO-35-42 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0114
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 9985, 10023
Emails and documents by topic and date, also located in LPEE:	180501 WEBLINK Pymt180501.pdf 181203 WEBLINK \$500 Wire 181203.pdf 181204 WEBLINK Invoice 181204.pdf

678. RICO-40 Racketeering Violations: Fraudulent Sales Opportunities, International 2020-2021

A. Fraudulent international sales and sourcing opportunities in the Middle East, China, southeast Asia, Australia, South America, Russia, United Kingdom, and various countries throughout Europe, involve several defendants posing as international traders between 2018 and 2022 including, without limitation, defendants Assure Group International (ASSURE GROUP, AGI), ABT Trading, DC INTERNATIONAL, Todd CRAFT, LEVERSTONE (Andrew CHO), TRADEIMPEX, and TRADIMPEX. Defendants provide fraudulent international sales leads and

fraudulent sourcing opportunities, using wire fraud and contract fraud. These fraudulent services have cost Lead Plaintiff owned and managed business entities extensive time, financial and other resources, and resulted in lost time and business development options for legitimate sales opportunities in interstate and international commerce. See LPEE pages 140 et al, 9260, 9547, 9548-9561, 9568-9572, 9840, 9890-9896, 9897-9901.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4-14
Complaint paragraphs:	673-680 RICO-35-42 generally

Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0114
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 9260, 9547, 9548-9561, 9568-9572, 9840, 9890-9896, 9897-9901
Emails and documents by topic and date, also located in LPEE:	<p>ABT ICPO Lan Zhou Utility Beef Qtrs 210913.pdf</p> <p>ABT inquiry 200731,</p> <p>ABT Pork 6 way China 201008,</p> <p>ABT Pork 6 way China Referral Contract 201008,</p> <p>ABT Pork 6 Way Referral 201008,</p> <p>ABT FL Quote 210105,</p> <p>ABT re Korea Angus pgm 210118,</p> <p>ABT FL Quote 210123,</p> <p>ABT re Euro price quote request 210428,</p> <p>ABT China Utility Grade 210610,</p> <p>ABT re deboning labor costs and pricing 210613,</p> <p>ABT quote request for Houston TX delivery 210616,</p> <p>ABT re WhatsApp and Houston 210626,</p> <p>ABT Partner re China quotes 210902,</p> <p>ABT Partner re Freelancer label delay 210907,</p> <p>ABT re Lan Zhou ICPO LOI-FM-210913,</p> <p>ABT re pending contract 210914,</p> <p>ABT sends Lan Zhou ICPO-FB4-LZ-210914,</p> <p>ABT re further deadline extension request 210915,</p> <p>ABT re termination 210915,</p> <p>ABT Trader Liu Intl Termination 210916,</p> <p>ABT quote request 211223,</p> <p>AGI pork heads 200916,</p> <p>AGI Uruguay beef sale 210414,</p> <p>AGI RFQ non-GMO soybeans 210421,</p> <p>AGI non-GMO Soybeans 210527,</p> <p>AGI non-GMO soybean supplier quote reply to SBI 210528,</p> <p>AGI non GMO soybeans 210531,</p> <p>AGI beef utility wrapped qtrs 210714,</p> <p>AGI re Q421 pricing 211017,</p> <p>AGI Trader quote request 211227,</p> <p>AGI coal handling inquiry 220622,</p> <p>AGI Quote Request 220701,</p> <p>AGI SBI unable to reply AGI disappears 220701,</p>

	<p>ASSURE GROUP AGI signature page 201002.pdf</p> <p>Bawtry ProForma Invoice from WCC bdproforma 180530.pdf</p> <p>Bawtry UK Winnett PO 180529.pdf</p> <p>BR Packer Quote Request FOB Indonesia 210203,</p> <p>BRF China re contact info for RMC China rep 210125,</p> <p>BRF Brazil re pymt terms for new customers 210127,</p> <p>BRF Quote Authentication Request 210127,</p> <p>BRF_Specification & Price Offer 2020 210127.pdf</p> <p>Caviness CS Cattle re finishing contract potential 200901,</p> <p>Caviness on plant availability for slaughter pending order 210617,</p> <p>Caviness re slaughter availability 210915,</p> <p>Cho Trader 200911,</p> <p>Cho Trader re pricing 210104,</p> <p>Craft sourcing agent and network on pork products 201014,</p> <p>Craft re bogus chicken part ref photos and doc set 210123,</p> <p>Craft re bogus chicken part ref photos and doc set2 210123,</p> <p>Craft re bogus supply network 210127,</p> <p>Craft re bogus suppliers prev provided 210128,</p> <p>Craft re quote request 210227,</p> <p>DC INTERNATIONAL DALEUSKI Passport DC Intl 180318.pdf</p> <p>Est Date of DC INTERNATIONAL Sales Agreement 190310.pdf</p> <p>Est Date of DC INTERNATIONAL Sales Agreement Signed 190310.pdf</p> <p>DC INTERNATIONAL DALEUSKI re KUMIN intro 200902,</p> <p>DC Intl Intro KUMIN Galkin 200902,</p> <p>DC Intl re export mkt dev 201214,</p> <p>DC Intl re export pgm 201214,</p> <p>DC INTERNATIONAL DALEUSKI re pricing 201221,</p> <p>DC Intl re Korea Angus pricing 210118,</p> <p>DC Intl Beef Pricing Quote 210203,</p> <p>DC Intl beef quote request 210712,</p> <p>DC INTERNATIONAL DALEUSKI re pricing 211020,</p> <p>DC Intl pricing availability 211020,</p> <p>G3 Vancouver BC Terminal Transit for AGI Quote Request 211130,</p>
--	---

	Interbio ICPO N° IBI-20190321-01 Beef Cuts_ Signed 190411.pdf Leverstone LOI Beef 190303.pdf Manning Beef CA quote request 210226, Manning Beef CA quote request reply 210302, Manning re contracts in process 210330, Manning China case ready 210405, Manning Beef re slaughter avialability 210914, Mercaimpex ES initial hit180301, Sadia BR re quote request 210124, Tradeimpex fup prior INSIGHT Network domicile 180301, Tradeimpex re Madrid air frieght 180301, Tradeimpex re Madrid air frieght differential 180302, TRADEKEY intro 170825, Tradimpex BR re retail prepack 210319, Tradimpex BR re quote 210325, Tradimpex BR re case ready retail prepack 210406, Tradimpex BR re China beef quotes 210423, Tradimpex BR soybean availability 210423, Tradimpex re prices quotes and competitiveness 210521
--	--

679. *RICO-41 Racketeering Violations: Fraudulent Sales Opportunities, Domestic 1985-2022*

A. Lead Plaintiff expended company and personal funds to prepare sales materials, develop sales leads, and secure sales for various entities he owned, controlled, and managed as a result of defendants' fraudulent sales opportunities from 1985-1993, and from 2002-2005, and from 2015 to 2022. While the records documenting this travel, and other direct and overhead expenses, and the related loss of sales revenue and personal income are not currently accessible to Lead Plaintiff, and are controlled or maintained by defendants, all these instances of interstate travel require expenditures of personal and company funds and are the subject of future discovery in this case.

B. Initial entrepreneurial efforts began in late 1983 with the personal expenditure of hundreds of hours and about \$4,000 of Lead Plaintiff's personal funds invested in software development for a hotel industry scheduling system, which was purposefully rejected by an agent of defendant UNITED STATES posing as the CFO of Westin Hotels in the Westin Corporate Headquarters in Seattle, WA, alongside ZOULAS and THORPE. This meeting and rejection occurred some months after the Seattle Westin cost reduction project, developed and managed by Lead Plaintiff, was completed. This innovative first of its kind services industry software system, similar to those now broadly used in services industries including, without limitation, hotels, banks, and retail stores to control labor costs and manage customer service levels, was declined, unknown to Lead Plaintiff at the time, for the purpose of sustaining the illegal human trafficking, human subject medical experimentation without consent, involuntary servitude, and forced labor of the Lead Plaintiff by defendant UNITED STATES.

C. Defendants collectively engage in contributing to this conspiracy through the use of their facilities, websites, personnel, email addresses, and other means to conspire in and facilitate these extended series' of constructive frauds which are intended to perpetuate, deprive, and entrap Lead Plaintiff while starving his various enterprises of legitimate commercial opportunities to engage in interstate commerce. These defendant commercial business entities include, without limitation, the named defendant entities commonly known as WALMART and WALMART China, Bentonville, AR; KROGER, Cincinnati and Blue Vine, OH; Alberts Organics, Los Angeles, CA; COSTCO, Issaquah, WA; VENDORCO, San Diego, CA; various defendant Skaar Livestock and related entities, Lewistown, ID; BDO, Salt Lake City, UT; Bay State Milling, Boston, MA; Briggs & Stratton, Wauwatosa, WI; Badger Meter, Milwaukee, WI; Raynor Garage Door, Dixon, IL; First Alert, Aurora, IL; Borg Warner, Muncie, IN; Adtran,

Huntsville, AL; Western Digital, San Jose, CA; currently unidentifiable grocery wholesaler in the midwestern states; Orange City Beef, Orange City, IA; Bio-Lab, Lawrenceville, GA; Brightstar, Miami, FL; Rockwell Collins, Cedar Rapids, IA; Rocketdyne, Folsom, CA; Steel and Pipe Supply, Manhattan, KS; Samsonite, Denver, CO; Holland Group, Holland, MI; PPG, Pittsburgh, PA; Clipper Windpower, Cedar Rapids, IA and Carpinteria, CA; various Canadian firms with offices in Vancouver, British Columbia, Canada. Other co-conspirators will be identified through recovery of Lead Plaintiff's own records from defendants as well as through defendants' discovery disclosures. These defendants conspire with and sustain, together with other known and as yet unknown defendants, the abuses and violations of law and rights in this long-running conspiracy and pattern of racketeering acts and rights violations. See LPEE pages 140 et al, 427, 430, 463, 518, 616-618, 693, 711-740, 8379, 9068-9078, 9093, 9193, 9194-9206, 9240, 9277, 9278-9279, 9280, 9392-9393, 9538, 9539-9545, 9547, 9573-9591.

D. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626

RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4-14
Complaint paragraphs:	673-680 RICO-35-42 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0114
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 427, 430, 463, 518, 616-618, 693, 711-740, 8379, 9068-9078, 9093, 9193, 9194-9206, 9240, 9277, 9278-9279, 9280, 9392-9393, 9538, 9539-9545, 9547, 9573-9591
Emails and documents by topic and date, also located in LPEE:	Alberts Organics first hit 140115, Alberts buyer re free freight 140218, Alberts Organics Argiros and Pres phone mtg 170516, Alberts Organics as Customer 170516, Alberts Organics as Customer 170517, Alberts Organics as Customer 170619, Alberts Reorg replace Pres 170707, Alberts Organics 201312300955 New Vendor Form Signed 140217.pdf Annies General Mills CROSS Marketing Discussion 210818, Bay State Milling RFQ 220328, Bridges re organic produce PNW and COSTCO sales 140410, Bridges re production update 160922, CalOrganic Price List 201401301259 131021.pdf COSTCO Padilla on Craves 161110, COSTCO initial review 170630, COSTCO HUSKEY re China ofcs 210130, COSTCO HUSKEY re China ofcs 210207, COSTCO HUSKEY Update 210604, COSTCO HUSKEY on organic beef 210616, COSTCO HUSKEY re pricing organics 210617, COSTCO GC reply to verification request 211102,

	<p> VENDORCO Walker SBI Teaser for COSTCO 190213.pdf VENDORCO Wlaker Signed Agreement COSTCO 190213.pdf CrowdCow organic beef intro 210426, DD re 5 yr plan to WMT 161231, DD Callahan (KEENE) re lending DD name to WMT presentation 170126, Earthbound Kodet re cust commitment and timing 140327, EMN Europe Sales Network 180228, EMN Euro unapproved 180301, England Logistics WCC Signed CCLTL Customer Packet (Master) 180723.pdf General Mills outreach re Annies 210806, Hive re non-std product line 210914, KROGER cold email initial hit 161005, KROGER re mtg plan 161010, KROGER re coming mtg 161107, KROGER mtg contact info 161109, KROGER mtg fup 161109, KROGER Frys Avg Utilization Jose MERCED 161221, KROGER Demand Projection MERCED 161223, KROGER cust ltr request 170426, KROGER re organic pork availability 210426, Liu Markk re ICPO-FB4-LZ-210914, Natural Grocers New Item Submission 210811, NYC Ace Produce Hit 150724, 1856_001 SMETA Audit Invoice181011.pdf Preferred Freezer CA Winnett Cattle 2018 Agreement Preferred signed 180604.pdf Pruska investor 161128, Pruska investor 161129, PWP update 160928, RaboAg Kemp re Arlon Podzemny Perico 130203, Rabo on Oliver Direct funding 160721, Raboag Pitcher re Skaar review 170429, Raboag Wilson TX 170531, Rabo on organic fruits and veg mkt outllok 170822, RAM initial meeting set 160325, RAM re sales POs 160430, RAM re Maines 160503, RAM call to update RAM progress 160505, RAM contract redline draft 160509, </p>
--	---

	<p> RAM update 160526, RAM re progress and concerns 160527, RAM re progress and sales lead 160604, RAM re sales leads progress 160609, RAM initial referrer reconnect 160708, RAM on CS sales mtg 160711, RAM initial referrer reconnect 160720, RAM Olin Capital Accepts Termination 160722, RAM re DD Clark McKenzie 160809, RAM termination no results 160907, RAM continues work 160911, RAM re CS apptmt attempt 161027, RAM CS reqmts 161028, RAM CS 161103, RAM CS stall 161108, RAM conv produce fail 161121, RAM on conv produce contractual issues 161205, RAM re conv produce agents sales progress 161215, RAM failure on conv produce and lack of notice 161221, RAM C&S WinnettOrganics C&S Presentation 160604.pdf RAM Reinhart WinnettOrganics Reinhart Food Services 160609.pdf Safeway Rayburn decline 210614, SBI Team on WMT mtg plan 210702, Sirk re selling product 210115, Smith sales intro call in AZ 160704, Smith Triple Fresh Contact on Sales Prospects 160907, Smith Triple Fresh passes setback on sales 160915, Smith re WMT prior sales agents failures 161011, Smith re avocados sales hook and PACA 161102, Whole Foods Weening organic beef decline 210610, WMT initial hit on cold email 161002, WMT fup Baldwin 161010, WMT MCCORMICK ref from Baldwin 161011, WMT sales news to WO team 161011, WMT MCCORMICK Webex 161014, WMT MCCORMICK call tomorrow email 161017, WMT MCCORMICK call fup 161018, WMT MCCORMICK call fup production volumes 161020, WMT MCCORMICK call 161109, WMT MCCORMICK re DD discussion 161114, </p>
--	--

	<p>WMT MCCORMICK resked and participant list 161114, WMT MCCORMICK call fup 161116, WMT MCCORMICK call fup 161118, WMT MCCORMICK re investors ibankers 161121, WMT MCCORMICK on contract outline 170108, WMT MCCORMICK Bentonville Mtg Attendees 170111, WMT MCCORMICK 170224 Bentonville mtg Present Draft 170123, WMT MCCORMICK email Bentonville Mtg Presentation 170123, WMT MCCORMICK Bentonville Mtg Attendees 170216, WMT MCCORMICK Bentonville Mtg Invite 170216, WMT MCCORMICK Bentonville Mtg Location 170216, (see also LPEE page 1074U, entry 2/21/2017) WMT MCCORMICK Bentonville mtg fup 170222, WMT MCCORMICK re post Bentonville Mtg Rev 170222, WMT MCCORMICK nonreply fup 170328, WMT Baldwin re decision next week 170403, WMT MCCORMICK re mktg plans 170403, WMT MCCORMICK on price drop 170412, WMT MCCORMICK buyer contacts 170425, WMT China Beef ref from MCCORMICK 170703, WMT connects China on beef 170703, WMT China Zheng initial contact 170704, WMT China Zheng merch support 170707, WMT China Zheng ROM pricing 170708, WMT China beef HIGAKI intro 170718, WMT China beef HIGAKI pricing 170811, WMT China HIGAKI price quote 170811, WMT China Hgiaki Quotes Specs 170821, WMT China HIGAKI adding WO factory id 170821, WMT China HIGAKI request factory number add 170821, WMT China HIGAKI quote fup 170822, WMT China WO Status Report WMT China Beef 680 ton order 170921, WMT Chna HIGAKI re WMT contract 170924, WMT China HIGAKI re process steps 170926, WMT China Preferred Freezer initial hit 170926, WMT China Americold initial hit 170929, WMT China Cargill contact punt 171002, WMT China HIGAKI Executed WMT Contract 171010,</p>
--	--

	<p>WMT China Update WO Team 171012, WMT China HIGAKI China visit and update 171023, WMT China HIGAKI re contract signature rqmt 171023, WMT China HIGAKI re JBS Specs 171026, WMT China HIGAKI on revised order pricing 171208, WMT MCCORMICK on China status 171220, WMT China re labeling 180110, WMT China xmit manually signed contract copies 180112, WMT China order processing timeline 180115, WMT China HIGAKI re sked 180116, WMT China order timing Apr 180116, WMT China HIGAKI re factory flow charts trial shipment 180122, WMT China HIGAKI orig signed contracts sent 180123, WMT China CA OWB Packers delay 180131, WMT China HIGAKI intro of SCS process 180201, WMT China HIGAKI re OWB approval 180201, WMT China HIGAKI SCS 180201, WMT China Hgiaki re Cargill Tyson on China 180202, WMT China Higki re OWB SCS audit 180202, WMT China OWB stringout 180206, WMT China OWB stringout 180207, WMT China OWB stringout 180214, WMT China OWB stall 180223, WMT China OWB stall continues 180223, WMT China SamsClub China dragin 180227, WMT China HIGAKI email sig page xmit 180228, WMT China LiqCap AZ update 180228, WMT China PETERSEN re signed contract evidence 180301, WMT China re post OWB to JFO 180301, WMT China JFO inquiry 180302, WMT China re retail link 180302, WMT China status on China 180302, WMT China re local China ofcs 210130, WMT China re China ofc and contact history 210202, WMT China Liao re China ofc details 210204, WMT China on packaged cuts 210222, WMT China docs needed 210312, WMT China Liao re new ofcs in China 210407, WMT China re beef purchase embargo in China 210415,</p>
--	---

	WMT China SAmerica Quote 210422, WMT China rejects BR Tradimpex case ready pricing 210426, WMT China intro to RMC China rep Jason 210428, WMT re US organic beef pgm 210605, WMT Redfield on domestic organic beef 210607, WMT Lehr Organic Beef Intro 210610, WMT re organic beef partner pgm 210615, WMT Lehr video mtg 210616, WMT Lehr re comp organic price premiums on ther products 210617, WMT Redfield cc Lehr video mtg 210617, WMT Lehr alt sales ramp 210618, WMT Lehr Baskin video mtg to come 210702, WMT Hutchins mtg set 210713, WMT Baskin Lehr call fup on pricing 210729, WMT Baskin Lehr video call 210729, WMT Partnering Zoom Call 210729, WMT Baskin on pricing 210810, WMT Baskin status inquiry 210816, WMT Baskin pass 210818, WMT Organic Beef pass 210818, WMT Organic Beef pgm not established 210823, WMT Baskin re pass pricing other issues 210824, WALMART China Retail Link Vendor application 10172-10173 WMT MCCORMICK 170221 Bentonville mtg Revised Presentation Fup 170222.pdf WMT SCS Audit Preferred Frzr 20180517_1005110267Deposit_Invoice 180517.pdf WMT Std Supplier Contract Signature Page image2018-02-09-142033 180207.pdf
--	---

680. RICO-42 Racketeering Violations: Fraudulent Sales and Marketing Representation 2019-2021

A. This pattern of sales lead development frauds and fraudulent lead reports repeats yet again in 2019-2021, conducted by defendants VENDORCO (FBI), and FOSHAN SHUNDE XinJianHan Trading Co, Ltd (RMC, CIA), with Raymond POON as principal, LONERGAN

(FBI) as intermediary both as the referral source to POON and as an alternate contact to POON after the introduction. VENDORCO through its principal, Susan WALKER (FBI), domiciled in or around San Diego, California represented one of Lead Plaintiff's companies, Winnett Cattle Company, to COSTCO. Perimeter Sales and Marketing was a sales representation firm to retail grocery fresh departments (produce and other fresh products) domiciled in California. RMC (POON, LONERGAN) is alleged to be a commercial trading operation domiciled in New York City, with a dedicated agent allegedly operating from Shanghai, China to solicit customers in China for Sheldon Beef, with progress as reported by that China-based sales agent. Lead Plaintiff also assigned sustainment of Lead Plaintiff's business entity Sheldon Beef's (Interline Exhibit 12) relationship with WALMART China so POON's entities could earn commissions through that relationship. Defendant POON and other related defendant personnel provided fraudulent sales leads and reports, facilitated by wire fraud and contract fraud, for the fraudulent purpose of stripping authentic international sales opportunities from Sheldon Beef (Interline Exhibit 12). These fraudulent services cost the company nearly two years lost for legitimate international sales opportunities. Defendant UNITED STATES also introduced an influencer MANNER who consumed time and resources in Lead Plaintiff's attempt to launch the consumer retail website for Sheldon Beef with influencer marketing.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and

racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4-14
Complaint paragraphs:	673-680 RICO-35-42 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0114
LPEE pages (see technical note on page numbering at paragraph 230):	Not applicable
Emails and documents by topic and date, also located in LPEE:	Manner Influencer Contract 210901, Manner Influencer Status 210909, Manner Influencer re web progress status 210910, Manner Influencer Hold 211101, Perimeter Sales Mktg re brokered LA regional mkt coverage 140408 Perimeter Sales Merchandising Pitch Deck 140408.pdfRMC LONERGAN re agent quals 200811, RMC LONERGAN POON mtg 200812, RMC LONERGAN re contract 200812, RMC POON Raymond Signed Contract RMC Signature page 200813.pdf RMC LONERGAN contract agreement 200813, RMC LONERGAN POON collaboration agreed 200814, RMC LONERGAN re sales activity 200830,

	<p> RMC LONERGAN re co-venture details 200831, RMC POON coventure orgzn options 200902, RMC LONERGAN 200903, RMC LONERGAN re pricing 200908, RMC LONERGAN re China Mktg 201207, RMC LONERGAN re POON mktg direct support 201207, RMC China direct mktg pgm 201230, RMC POON re BRF contact inside China 210126, RMC re BRF info request 210128, RMC LONERGAN re COSTCO WMT on China ofc 210130, RMC POON on BRF China mtg results 210203, RMC re China contract mod 210225, RMC LONERGAN on RMC sales strategy doc China 210226, RMC LONERGAN re Berkshire pork 210307, RMC LONERGAN re Berkshire cuts cherry picking 210311, RMC LONERGAN re China sales progress 210311, RMC LONERGAN Berkshire Trial Order Pricing 210312, RMC LONERGAN re Berkshire volumes 210312, RMC LONERGAN 210316, RMC LONERGAN sales prospect report 210316, RMC LONERGAN Yao Quote 210316, RMC LONERGAN China sales quotes 210326, RMC re signed modified contract 210331, RMC LONERGAN beef sales quote 210413, RMC China sales report 210430, RMC POON on Big Sandy investment potential 210507, RMC Jason on WMT China Intro mtg 210511, RMC POON on status 210518, RMC China pricing 210520, RMC Jason on scam beef request 210525, RMC China sales pgm conversion attempts reqd 210622, RMC Jason re sales efforts 210628, RMC Jason Sales Advice 210628, RMC Jason Omasum No Quote 210703, RMC POON re status and future pymt opptnys 210731, RMC Jason re status 210816, RMC POON re status 210816, RMC re 60 day notice terminating 210902, </p>
--	---

	RMC LONERGAN re repay advances 210903, RMC payment plan request 210903, RMC POON re pricing guidelines 211015, RMC Raymond re status 211220 COSTCO Walker VENDORCO HUSKEY COSTCO Final Presentation 190501 (1) (2).pdf
--	---

Racketeering – Dishonest Professional Services

681. RICO-43 Racketeering Violations: Dishonest Professional Services – Accounting Compilation And Review 1993, 2021

A. 1993: As forensically reverse engineered, CPA reviewed financial statements for Alliance were required to obtain financing allegedly available from a Vancouver, BC source as represented by CORNWELL (defendant CIA). So, Lead Plaintiff engaged the professional accountant “sister” recommended by a former Deloitte Seattle employee, Phil Walter. This individual then stopped working and abandoned this assignment during preparation (FBI, UNITED STATES), leaving the financial statement compilation incomplete after being paid for work to date. This led to protracted delays in preparation as the Lead Plaintiff was forced to spend days straightening out her mess instead of bidding projects to sustain Alliance’s critically important sales and cash flow. The financial statement review process was then further dragged out by the “accountants,” a local accounting firm which was actually just another defendant FBI illegal cover spying operation posing as an accounting firm. This entire defendants FBI and CIA mandated financial statement compilation and review to complete the proposed financing cost the company a substantial portion of the \$20,000 loan fraudulently advanced by Pacific Financial Services (FBI, Henry Wozow) for professional fees and expenses, which was the specific cause of Lead Plaintiff’s personal bankruptcy filed in November 1993 (paragraph 653 RICO-15).

B. 2021: Defendant WEFUNDER and its officer and employees, through the various entities legally named above, whether acting on its own behalf or as spoofed by other defendants with police powers representing themselves as WEFUNDER personnel and as the actual website while acting as a defendant agent, officer, and as part of this on-going conspiracy, represented themselves, their firm, and their web platform as capable of and sincerely interested in, securing financing on behalf of Lead Plaintiff's Winnett and/or Sheldon Beef entities, thereby coordinating with and playing an on-going role in 2021 in a complex sales, production, operations, and financing scheme to deprive Lead Plaintiff and his related entities of authentic opportunities to engage interstate commerce.

C. Among their bad faith acts was defendant WEFUNDER's role in knowingly recommending an auditor, Alice CHENG, who after gathering key financial information on their behalf from Lead Plaintiff's company, refused to issue any form of the professional auditor Opinion letter required to complete the financial statements (paragraph 672B RICO-34), so the fund raising process could be undertaken as planned in conformance with SEC Regulation A+. This scenario played out almost identically to defendants' previous frauds and swindles in paragraph 659 RICO-21 undertaken by defendant ADAMSON Brothers (FBI) and in paragraph A above (CIA, FBI, CSIS, RCMP).

D. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and

racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	653, 672B RICO-15, 34; 681-690 RICO-43-52 generally
Appendix 2 paragraphs:	1-017
LPEE Table 2 pages 12023-12120 paragraphs:	2-0053 through 2-0059
LPEE pages (see technical note on page numbering at paragraph 230):	Not applicable
Emails and documents by topic and date, also located in LPEE:	<p>WEFUNDER MAGGARD as sponsor 210719, WEFUNDER Solicitation fup example 1of55 sent 210719, WEFUNDER MAGGARD re 2k 210720, WEFUNDER LABELLE re mandatory signup to vouch 210803, WEFUNDER GAAP Acctnt CHENG 210902, WEFUNDER start sequence 210903, WEFUNDER GAAP Acctnt CHENG Delays 210907, WEFUNDER re CHENG auditor delay 210908, WEFUNDER GAAP Acctnt CHENG 210909, WEFUNDER GAAP Acctnt refuses Opinion 210909</p>

682. RICO-44 Racketeering Violations: Dishonest Professional Services, Web 2021-2022

A. Defendant ENVOTEC, a website developer, located by Lead Plaintiff in Pakistan through a defendant spoofed or otherwise controlled version of website Freelancer.com, and while acting or posing as its employees and contractors, was paid for web development services. Defendants, including the funding source for this fraudulent project using cover name Michael MAGGARD, FBI Amarillo (paragraph 648 RICO-10), as an element of their on-going pattern of racketeering acts, never intend to allow these web development services to be completed and for the online Sheldon Beef store to operate and be permitted to offer products for retail sale. This was another in the series of these fraudulent interferences in interstate commerce against an online store by defendant UNITED STATES, FBI. The Lead Plaintiff had previously developed an online store on Shopify.com intended to be used to launch product sales to beef wholesalers, and which was the subject of a launch meeting with fraudulent employees Jason WASEMAN, Chris CANCHOLA, and Lori ALVAREZ in Avondale, AZ, as documented in paragraphs 686-690 RICO-48 through 52 herein, as well as in email evidence stripped and/or currently blocked by defendant UNITED STATES. Funds for web subscriptions, travel expenses and reimbursements, and other resources were expended in interstate commerce to attempt to launch this interstate commercial enterprise, as part of the attempted startup and commercialization of Gannett Peak Ranch, a now defunct Oregon corporation funded by Lead Plaintiff out of pocket.

B. This fraud and swindle is an element of defendants' on-going conspiracy to sustain, among other acts, violations, and injuries, involuntary servitude, forced labor, and human trafficking using repeated cycles of delay and financial starvation of Lead Plaintiff's business entities, and used to further their intent to exhaust the personal financial resources of Lead

Plaintiff, who regularly has and does invest personal funds and extensive amounts of personal time and professional talent in each of these entities in good faith. These expenditures in international commerce are shown at LPEE pages 10093, 10094.

C. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	648 RICO-10, 686-690 RICO-48 through 52; 681-690 RICO-43-52 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0001, 2-0171, 2-0172, 2-0174, 2-0176, 2-0177

LPEE pages (see technical note on page numbering at paragraph 230):	10093, 10094
Emails and documents by topic and date, also located in LPEE:	GPR website developer re feedback 210814, GPR Website stall 210819, GPR Website product load begins 210820, GPR website further delays 210824, GPR Startup Plan Rev 210829, GPR website closer but not functional 210903, GPR website slides again 210907, GPR website added dev fees 210909, GPR web dev re project hold 211026, GPR Web contacts zero response rate note 221117

683. *RICO-45 Racketeering Violations: Dishonest Professional Services, Legal 1986-2005*

A. Lead Plaintiff businesses and intertwined personal interests have been repeatedly deprived of honest legal services at various law firms. This trail of attorneys who did minimal or no legal work for the corporate clients Lead Plaintiff owned or worked for between 1986 and 2005 include, but sustained professional relationships include, without limitation: (i) Lazersoft - Glen GARRISON at Keller Rohrback; (ii) Alliance Environmental Services - Robert HIBBS and Susan THORBROGGER at Short Cressman & Burgess; (iii) CNA Industrial Engineering - Mike BABCOCK (also spouse of Lead Plaintiff co-worker Gwen HEATHCOTE at Deloitte Seattle); (iv) Allegent, LLC dba Performa - Michael LARSON - LARSON Hart & Shepherd, later Pivotal Law Group. LARSON was introduced by John C. T. “Jay” Conte, a federal commercial cover agent specializing in financial frauds (defendant FBI). (v) Leslie CALDWELL (defendant DOJ, cover name not recalled) at Seed & Berry, Seattle, Washington relating to intellectual property claims by Allegent LLC (which Lead Plaintiff unwittingly co-owned with PRAY as he operated undercover for defendant UNITED STATES and using its funds) against ShipNow (another UNITED STATES FBI fraudulent cover company run by Kurgan), where TARPLEY was also

noted to appear in a bank branch on an intervening retail shop floor to Lead Plaintiff's left during his multi-floor transiting escalator ride from the Fourth Avenue building lobby to the Fifth Avenue elevator lobby enroute to Lead Plaintiff's meeting regarding ShipNow intellectual property litigation with CALDWELL and PRAY at Seed & Berry.

B. Examples of this pattern of practice of illegal general searches includes:

1) Corporate lawyers who act against client interests while apparently engaged for their benefit. Lead Plaintiff was not consulted prior to the removal of a cost-plus provision at paragraph 12 of the Alliance purchase and sale agreement for the asset purchase of Steve's Maintenance, including the assumption of project contracts for projects then currently underway but incomplete. THORBROGGER, the Short Cressman & Burgess attorney did not mention the removal of the cost-plus reimbursement paragraph 12 to Lead Plaintiff. Only his direct review and insistence on its return to the agreement resulted in the final agreement which included this paragraph 12. If the purposeful deletion by Susan THORBROGGER (Short Cressman Burgess, Seattle, WA, most probably DOJ, together with HIBBS) had not been noticed and returned to the document on Lead Plaintiff's insistence, this deletion would have potentially cost Alliance up to \$165,000 of lost cash flow plus approximately \$100,000 of unreimbursed costs for labor, materials, asbestos waste dump fees, and direct project overhead costs, on the Bates Vocational-Technical parking garage asbestos abatement project. This labor-intensive project required hand jack-hammering and removal of an asbestos paper interposed between the concrete finish floor and the underlying structural floor in the multi-story parking structure at Bates in Summer 1990. A \$265,000 loss would have wiped out company equity (initially \$250,000) within four months of the purchase and left the Lead Plaintiff in personal default on a \$150,000 U.S. Bank, N.A., line of credit due

to his personal guarantee with excellent personal credit. Nonetheless, defendant FBI would go on to complete the wrecking of the illegal search cover company, Steve's Maintenance. As forensically reverse engineered, this process destroyed Lead Plaintiff's company Alliance in 1993 through the use of, without limitation, as part of defendant UNITED STATES' intentional financial wrecking of Lead Plaintiff's company Alliance, which incorporated (i) fraudulent co-ownership and control through a nominee (David J. Carey as nominee, FBI, paragraphs 445-449, 649 RICO-11), (ii) fraudulent legal representation (HIBBS and Susan THORBROGGER, DOJ/FBI, both embedded at Short Cressman & Burgess law firm, paragraphs 446; 626 RGTS-6, 649, 651, 653, 683 RICO-11, 13, 15, 45), (iii) fraudulent deprivation of government benefits (SBA bonding, paragraph 446, 471; 649, 653 RICO-11, 15), (iv) theft and compromise of receivables (Steve and Kerry Brewer, FBI, paragraphs 644, 650, 651 RICO-6, 12, 13), was then succeeded by (v) a Vancouver, B.C. fraudulent financing which failed (paragraph 653 RICO-15). This was completed at the Lead Plaintiff's personal expense, including about three years of uncompensated professional labor and personal bankruptcy, for the specific purpose of destroying the Steve's Maintenance business records, thereby fraudulently concealing defendant FBI's criminal wrongdoing in its criminal investigations using this cover company.

2) The original bankruptcy case intended to be filed against LazerSoft by Lead Plaintiff and two other individuals (WATERS, TARPLEY), mysteriously resulted in absolutely no federal bankruptcy court actions or notices. With the benefit of forensic reverse engineering of defendant DOJ and FBI methods, this was most probably due to HIBBS' (DOJ or FBI, Short Cressman & Burgess, Seattle, WA) actual fraudulent failure to

file this litigation when directed to do so, while acting against Lead Plaintiff's personal interest in this matter.

3) Extensive and expensive subsequent litigation included a federal court hearing in the US District Court for Western Washington (Judge Carolyn Dimmick) on the standing of Network Imaging Corporation, then in the process of acquiring LazerSoft assets from parent Wembley plc in this matter in 1994 or 1995, in which the Court denied standing to Network Imaging. The case was never resolved but did lead to yet another matter allegedly filed related to WATERS' ownership of the intellectual property (software work product he produced), adding still more litigation expense. WATERS reported a \$30,000 overbilling by Short Cressman & Burgess lead attorney Robert HIBBS. Most probably this too was an internal conspiracy with Lead Plaintiff's two remaining co-workers, TARPLEY AND WATERS, actually operating as members of Lead Plaintiff's defendant FBI, USMS, DOJ, CIA, ARMY minder team throughout the entire sequence in perpetuation of the illegal involuntary servitude.

4) A \$150,000 account receivable of a PAN subsidiary was allegedly discounted with a commercial factor in southern California. These funds mysteriously disappeared into the factor's bank, First Interstate Bank, after PAN's CEO promised to pay Lead Plaintiff compensation from that receivable (paragraphs 450-451, 601C NSEC-2; 623D, G, 627A RGTS-3, 7; 644B(iii), 650B (ii), 652G, 653H RICO-6, 12, 14, 15). The funds were allegedly seized by the bank to repay an outstanding debt of the factor to the bank. PAN CEO CORNWELL declined to take immediate action within seven days as required by California law to legally notify the bank of the actual provenance of the payment to retain the PAN subsidiaries ownership interest in the payment, so the Lead Plaintiff was once again strung

out financially as the promise of legally due compensation being paid after another delay was broken yet again by the purposeful, deliberate, and conspiratorial associated-in-fact enterprise pattern of racketeering acts by defendant UNITED STATES, FBI, CIA, and other unknown individual defendants.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4-14
Complaint paragraphs:	445-449, 450-451, 471, 601C NSEC-2; 623D, G, 626, 627A RGTS-3, 6, 7; 644, 649, 650, 651, 652G, 653, 683 RICO-6, 11, 12, 13, 14, 15, 45; 681-690 RICO-43-52 generally

Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0001, 2-0056 through 2-0058, 2-0171, 2-0172, 2-0174, 2-0176, 2-0177
LPEE pages (see technical note on page numbering at paragraph 230):	Not applicable
Emails and documents by topic and date, also located in LPEE:	Not applicable

684. RICO-46 Racketeering Violations: Dishonest Professional Services, Legal 2014-2021

A. Defendant Raymond SULLIVAN was introduced to Lead Plaintiff by Charles JACKSON, a former CIA commercial cover “Merrill Lynch investment banker” who worked in Mexico City (likely in the same timeframe as Sheriff ARPAIO while ARPAIO was at DEA). Defendant SULLIVAN is an international trade attorney and former federal Customs and Border Protection investigator and attorney. Defendant SULLIVAN billed entities owned and controlled by Lead Plaintiff approximately \$400,000 for legal services between November 2013 and April 2021. He received \$10,000 paid for legal services from the funds invested by “DEAN T. SMITH” in August 2015 and continued his services billing at \$600 per hour despite Winnett’s inability to pay as Winnett and Lead Plaintiff were continually strapped for cash flow and being stripped of resources by the actions of defendant UNITED STATES.

B. Upon knowledge and belief, Defendant SULLIVAN was fundamentally detailed, as were prior attorneys referred by trusted sources to Lead Plaintiff and used by his business entities, for the actual purpose of spying upon and sustaining functional control of Lead Plaintiff and his related business enterprises, and to interfere with and surveil all contracts and business opportunities. These associated-in-fact enterprise racketeering acts under color of law were and are another element of defendant UNITED STATES and its co-conspirators’ overall scheme and pattern of frauds and racketeering acts used to perpetuate their human trafficking, involuntary

servitude, forced labor, and invasions of human autonomy and rights in support of illegal human subject experiments and the illegal BRMT bioweapon and bioweapon delivery system.

C. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4-14
Complaint paragraphs:	681-690 RICO-43-52 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0001, 2-0171, 2-0172, 2-0174, 2-0176, 2-0177
LPEE pages (see technical note on page numbering at paragraph 230):	383-384, 430-438, 440, 8370, 8371-8373, 8474, 8378, 8411, 9249-9255, 9285, 9311, 9820, LPEEV65-6, 7

<p>Emails and documents by topic and date, also located in LPEE:</p>	<p>Ray SULLIVAN ID incl Bar Numbers 140620.pdf Burgess Salmon 1 re London Closing 140917, Burgess Salmon 1 re London Closing 140918, Collins ref by SULLIVAN on Bridge Loan 150629, SULLIVAN re Benibo fake 131202, SULLIVAN Intro from JACKSON 140219, SULLIVAN on 140225 mtg 140226, SULLIVAN re Zayid investment 140304, SULLIVAN re Zayid as former Customs Investigator 140305, SULLIVAN re Mubadala Commission reqmt and FCPA violation 140715, SULLIVAN WO sends \$10K 150828, SULLIVAN appointed Corp Counsel 151110, SULLIVAN on financings 160111, SULLIVAN on financing lead from CASTRO 160206, SULLIVAN on MARV Capital drop 160401, SULLIVAN re INSIGHT scam Argold, Brereton status 160419, SULLIVAN re RAM Olin contract 160426, SULLIVAN on Oliver Term Sheet to Contract 160707, SULLIVAN on AKOTO Brewer Fund creation 160710, SULLIVAN on AKOTO Brewer Fund creation 160727, SULLIVAN Draft for Oliver Funding 160728, SULLIVAN re BLACKPOOL CAP 161128, SULLIVAN re ARPAIO Palmeri Gerlach Black Rock Farms 161220, SULLIVAN ARPAIO Palmeri Black Rock Farms Jack Palmeri 161222, SULLIVAN re WMT Bentonville visit Feb 161229, SULLIVAN re Smith 5K loan 170126, SULLIVAN re Whitestone Lex Gubsky Moneywise 170126, SULLIVAN Marvel re Black Rock Gerlach 170301, SULLIVAN re Black Rock Marvel 26 Ranch reappears 170301, SULLIVAN re Marvel Black Rock retainer review 170303, SULLIVAN re pea harvester lease 170303, SULLIVAN re RAM demand notice 170401, SULLIVAN re prospective escrow lenders 170602, SULLIVAN re CFO Smith termination 170608,</p>
--	---

	Sullian re FATCO re title for Skaar 170613, SULLIVAN TX HEC feedyard contract 180118, SULLIVAN review of E6 docs okay 180223, SULLIVAN re sales contract review 200804, SULLIVAN re ABDELSAYED 2mm loan gty shares grant 200822, SULLIVAN re RMC contract mod 26 Ranch sked 210225 SULLIVAN Billing for Feb 2019 190228.pdf SULLIVAN Billing for Jan 2019 190201.pdf SULLIVAN December 2018 Billing 190102.pdf SULLIVAN Winnett Perico Bill for April 2019 190501.pdf SULLIVAN Winnett Perico Bill for August 2018 180901.pdf SULLIVAN Winnett Perico Bill for June 2018 180701.pdf SULLIVAN Winnett Perico Bill for March 2019 190401.pdf SULLIVAN Winnett Perico Bill for November 2018 181201.pdf SULLIVAN Winnett Perico Bill for October 2018 181101.pdf SULLIVAN Winnett Perico Bill for September 2108 181001.pdf
--	---

685. *RICO-47 Racketeering Violations: Dishonest Professional Services, MARICOPA SHERIFF, ARPAIO as Consultant 2014-2017*

A. Defendant Joseph ARPAIO, as MARICOPA SHERIFF, and as a private individual acting in bad faith outside the scope of his legal authority, was instrumental in orchestrating his own introduction to Lead Plaintiff as Greg Crossgrove (ARPAIO, Interline Exhibit 5, paragraph 661C RICO-23), an organic produce farming and packing expert with prior organic farming experience in 2014 through a fraudulent resourced online search result. Defendant ARPAIO (as Greg CROSSGROVE) also then MARICOPA SHERIFF allegedly worked with Captiva Verde, an organic grower domiciled in California with a farm in Arizona funded by investors associated with the Vancouver Stock Exchange, in Vancouver, British Columbia, Canada. Crossgrove (ARPAIO) also claimed an association with the Nunes family agriculture operations in California through his brother as President of a Nunes family fresh produce enterprise. Notably,

Representative Devin Nunes, closely aligned with then President Trump and House Minority Leader Kevin McCarthy, chaired the House Intelligence Committee around this time.

B. Consultant CROSSGROVE (ARPAIO) assisted Lead Plaintiff with production methods, staffing, and locating investors, none of which came to fruition. He introduced a fellow consultant, Ricky King, Double K Enterprises, (MARICOPA SHERIFF officer) who assisted the Lead Plaintiff in touring an abandoned farming property in Hyder, Maricopa County. AZ, then currently leased from the State of Arizona by Barry Oliver, allegedly a wealthy investor (both then current or former police powers officers or agent). Defendant ARPAIO also allegedly argued about production methods and costs with another defendant police powers agent or officer, Mike CASTRO, after CASTRO (defendant FBI) was selected to become the VP Operations for WinnettOrganics, a Lead Plaintiff business entity, and conspired with PAUL SMITH (defendant FBI) then posing as embedded Winnett CFO.

C. Lead Plaintiff took a copy of a signed \$52 million investment agreement with a Qatari company, Jabor, with him to an October 2015 organic vegetable packing plant construction meeting at Willmeng Construction's otherwise empty headquarters building in Maricopa County and showed the signed document to CROSSGROVE (defendant Sheriff Joseph ARPAIO) sitting to his immediate left as they faced the video conference screen at the other end of the conference room. See LPEE pages 8489-8506.

D. Eventually, this fraud and swindle come crashing down, by defendants' deliberate and continuing interferences in interstate commerce, with the Lead Plaintiff having been run through another years-long sequence of associated-in-fact enterprise pattern of racketeering acts, false starts, false promises, frauds, and failures which began in 2013, continued with ARPAIO's direct involvement from late 2014 until a final email exchange on August 17, 2017, around the

time of his conviction on criminal contempt charges, and about a week before he was pardoned by President Trump.

E. This years-long sequence included air, hotel, and car rental expenses along with uncompensated professional labor for, among other purposes business meetings and property and facility siting and selection tours; for processing plant design meetings in Salinas, CA and Maricopa County, AZ; to meet and present information to investors; to gather with employees for tours, company project kick-off and staff meetings; as well as sales trips to WALMART (Interline Exhibits 9-10) in Bentonville, AR, and to KROGER (Interline Exhibit 8) in Cincinnati, OH; attendance at conferences and referrals by agents or officers posing as investment firms and their officers or employees in New York City; all fraudulently perpetrated over years by these defendants as they have and do interfere with and affect interstate commerce and constitutional rights. This elaborate and wildly expensive multi-jurisdiction, multi-level of government fraud and swindle, incorporating media and other private entities and individuals as co-conspirators by defendants, has been and is completely fabricated, systematically fraudulent, and has and does involve thousands of emails, phone calls, and expenditures for travel, entertainment, proposals, samples, and mailings. It is a comparable sequence to those previously undertaken by defendants to control and human traffick the Lead Plaintiff since he began directly engaging as an “independent entrepreneur” in 1983, and it is a markedly similar process to his prior business and career experiences prior to 2005 and to the subsequent ten month stint at defendant ESTABLISH for defendant ROSENBERG (first defendant FBI in Seattle, WA until June 2005, then defendant DOJ from 2005 as US Attorney in two sequential federal districts - South Texas, Eastern District of Virginia) in 2007 to 2008, which is still the final employment and earned income permitted to Lead Plaintiff by defendant UNITED STATES and its co-conspirators. See

documentary and disbursements evidence which dates from December 2014 to August 2017 referenced below.

F. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	5 specifically, 4-14
Complaint paragraphs:	661C RICO-23; 681-690 RICO-43-52 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0172, 2-0174, 2-0176, 2-0177
LPEE pages (see technical note on page numbering at paragraph 230):	383, 386, 427, 431, 602, 616, 632-635, 8351-8352, 8489-8506, 8813-8854, 8937-8938, 8956, 10132-10137, noting

	entries for Arizona destinations and locations, LPEEV65-6, 7
Emails and documents by topic and date, also located in LPEE:	<p>ARPAIO Truitt initial hit connects to B Oliver 141108, ARPAIO CROSSGROVE (ARPAIO) first hit 141212, ARPAIO CROSSGROVE (ARPAIO) Persist Example 150707, ARPAIO from Brewer on startup plan 150810, ARPAIO intro Oliver 150902, ARPAIO on Project Progress Oliver 150906, ARPAIO on Plant Design Rqmts 150916, ARPAIO CASTRO Leases to do forgoteen during telcon 151007, ARPAIO availability 151014, ARPAIO tours Gerra Plug Power 151018, ARPAIO announces Captiva Salome Farm Availability 160210, ARPAIO on Oliver Hyder 160321, ARPAIO on involvement 160427, ARPAIO on greenhouses and financing arranged 160430, ARPAIO on lack of investor contact other updates 160505, ARPAIO King update 160511, ARPAIO on Oliver as poss investor 160513, ARPAIO on Oliver and Hyder layout 160520, ARPAIO on status and prior Captiva Verde involvement 160624, ARPAIO on Brother as Nunes exec 160627, ARPAIO on Oliver proposal 160703, ARPAIO on Oliver Term Sheet Clarification 160707, ARPAIO on Oliver Direct Funding 160721, ARPAIO on Proposed budget Oliver Hyder project 160729, ARPAIO on temp cooler Cowley Kodiak Produce PHX 160730, ARPAIO on Hyder Oliver per acre costs CASTRO 160801, ARPAIO info request 160805, ARPAIO on grow plan fin projections 160809, ARPAIO on Oliver deal collapse 160809, ARPAIO King re Hyder Oliver 160812, ARPAIO re Hyder Oliver resurrection 160813, ARPAIO on Oliver Hyder structure 160816, ARPAIO on Oliver Hyder 160819, ARPAIO on spring lettuce season 160819,</p>

	<p> ARPAIO on Oliver Hyder prep and Buckeye 160902, ARPAIO on acre reallocation 160906, ARPAIO on Oliver proposal and conv cropping 160911, ARPAIO connects RAM ACTS Freedom Famrs 160913, ARPAIO intro ACTS Freedom Farms 160913, ARPAIO on Oliver Hyder son objection 160913, ARPAIO ACTS Freedom Farms and Hinson 161005, ARPAIO on brother at Nunes and Sprouts open AZ 161008, ARPAIO CFO Smith re plan for Hyder Oliver presnetation 161026, ARPAIO on Oliver pitch date 161026, ARPAIO on Western Growers Assn Pricing 161027, ARPAIO CFO Smith re plan for Hyder Oliver presnetation 161102, ARPAIO re WMT KROGER 161215, ARPAIO on Gerlach NV 161216, ARPAIO refers Gerlach Black Rock 161216, ARPAIO re Sprouts 161230, ARPAIO re Sprouts KROGER COSTCO WMT 161230, ARPAIO Sheriff Term Ends 170101, ARPAIO ref grower shipper interest 170115, ARPAIO ref RWood Offer Letter 170115, ARPAIO on new VP Growing referred 170117, ARPAIO on Buckeye Greenhouses 170211, ARPAIO on Freedom Farms reconnect 170211, ARPAIO re phone appt avail 170216, ARPAIO on investor closing and startup 170303, ARPAIO re land avail and deadlines 170303, ARPAIO 170309, ARPAIO VP Grow comments 170309, ARPAIO as land rep announcement 170316, ARPAIO Prader Integrtd Ag re Hyder Farms 170526, ARPAIO on status inquiry 170707, ARPAIO 170724, ARPAIO on land and mkt conditions 170724, ARPAIO 170817, ARPAIO Prader IntegratedAG AZ hangs in 180207, CASTRO CA VP-Ops Intvw 150825, CASTRO CA re Mota Dir Ops add 150901, CASTRO introduces Gerlach to DB ARPAIO 151106, CASTRO re financings 151120, </p>
--	--

	<p> CASTRO re Hyder Water Quality 151126, CASTRO on Dole Gerlach 160125, CASTRO on lettuce production detail 160214, CASTRO on Kingman Farms status 160304, CASTRO progress report 160427, CASTRO re Hinson Lyle proposal via ARPAIO 160513, CASTRO on Aqua 4D saline water trmt 160608, CASTRO re personnel rqmts 160705, CASTRO re Aqua 4D Giora bkfst miss and Oliver mtg 160719, CASTRO on Aqua4D in Oliver Hyder budget 160731, CASTRO on budget format Oliver Hyder 160801, CASTRO on resignation 160810, CASTRO Separation Agreement 160811, CASTRO Separation Agreement to SULLIVAN 160811, CASTRO connection Aqua 4D Giliad email samples 161101 DD on Oliver Term Sheet 160711, DD Callahan (KEENE) re engement ltr 160714, DD Callahan (KEENE) re cancelled Oliver mtg 160812, DD on Oliver Hyder resurrection 160824, DD Hinson on production volumes 161106, Indeed re Galkin start 200716, Indeed Company recruiter Indeed 200828, Indeed re KUMIN Galkin starts 200828, Indeed recruiter re status 201022, King AZ ARPAIO Ops Connection 150818, LIBERTY EB-5 initial hit 141027, LIBERTY KELLER CARTER mtg thanks 141103, LIBERTY EB-5 WinnettOrganics LOI 11-12-14 141112, LIBERTY CARTER ref request services matrix request 141114, LIBERTY re CADC TEA eligibility 150106, LIBERTY backout excuse sent to UFIG 150505, LIBERTY EB-5 LOI to WP 221105, Liquid Capital AZ GOTTESMAN initial hit 170928, Liquid Capital AZ GOTTESMAN signed app 171012, Liquid Capital AZ GOTTESMAN on underwriting info request 171012, Liquid Capital AZ GOTTESMAN underwriting info complete 171013, </p>
--	--

	<p>Liquid Capital AZ GOTTESMAN email DLC sample 171017,</p> <p>Liquid Capital AZ GOTTESMAN 171101 mtg request 171024,</p> <p>Lyle Hinson re Buckeye Grnhses DC 161218,</p> <p>Lyle re 350K Buckeye whse cooler 160818,</p> <p>Oliver AZ mtg contact 150902,</p> <p>Oliver re Hyder Lease 150928,</p> <p>Oliver PHX Hyder Lease Sign 151004,</p> <p>Oliver Hyder Eqpt Lease Dep Status 151215,</p> <p>Oliver Hyder Funding update 151222,</p> <p>Oliver on financings outstanding 160111,</p> <p>Oliver Dole sales update 160123,</p> <p>Oliver on financings status 160129,</p> <p>Oliver on financings status 160208,</p> <p>Oliver on financings status 160217,</p> <p>Oliver on financings status 160223,</p> <p>Oliver has poss investor interest 160226,</p> <p>Oliver on financings status 160226,</p> <p>Oliver on status 160322,</p> <p>Oliver re Costamanga invest decsion postponed 160420,</p> <p>Oliver update 160629,</p> <p>Oliver Term Sheet Proposal 160705,</p> <p>Oliver on Term Sheet Clarification 160707,</p> <p>Oliver PHX mtg proposal 160713,</p> <p>Oliver re mtg location ARPAIO King CASTRO Smith 160714,</p> <p>Oliver 160719 mtg preview email 160718,</p> <p>Oliver Term Sht mtg update to TARAZEWICH 160719,</p> <p>Oliver on Hyder Budget Cost Detail 160810,</p> <p>Oliver on Hyder Deal Fail 160810,</p> <p>Oliver resurrects Hyder 160812,</p> <p>Oliver re Hyder Dev collateral 161103,</p> <p>Oliver re Hyder Dev proposal 161103,</p> <p>Oliver re Hyder Farm Dev Plan 161103,</p> <p>Oliver Hyder WO Presentation to Oliver 160719.pdf</p> <p>Oliver mtg WO ProForma Presentation V1 160719.pdf</p> <p>RAM connects ARPAIO ACTS freedom farms 160913,</p> <p>RAM on Hinson ACTS Freedom Farms 160914,</p> <p>Rose Jordan Recruiter Fee Agreement 150824,</p> <p>Smith re Oliver Term Sheet 160707,</p>
--	---

	<p> Smith re fine tuning on Oliver financial proposal 160720, Smith re IT traceability budget add Oliver Hyder 160731, Smith re Status Report Detail on Hyder Oliver et al 160818, WMT initial hit on cold email 161002, WMT fup Baldwin 161010, WMT MCCORMICK ref from Balwin 161011, WMT sales news to WO team 161011, WMT MCCORMICK Webex 161014, WMT MCCORMICK call tomorrow email 161017, WMT MCCORMICK call fup 161018, WMT MCCORMICK call fup production volumes 161020, WMT MCCORMICK call 161109, WMT MCCORMICK re DD discussion 161114, WMT MCCORMICK resked and participant list 161114, WMT MCCORMICK call fup 161116, WMT MCCORMICK call fup 161118, WMT MCCORMICK re investors ibankers 161121, WMT MCCORMICK on contract outline 170108, WMT MCCORMICK Bentonville Mtg Attendees 170111, WMT MCCORMICK 170224 Bentonville mtg Present Draft 170123, WMT MCCORMICK email Bentonville Mtg Presentation 170123, WMT MCCORMICK Bentonville Mtg Attendees 170216, WMT MCCORMICK Bentonville Mtg Invite 170216, WMT MCCORMICK Bentonville Mtg Location 170216, WMT MCCORMICK Bentonville mtg fup 170222, WMT MCCORMICK re post Bentonville Mtg Rev 170222, WMT MCCORMICK nonreply fup 170328, WMT Baldwin re decision next week 170403, WMT MCCORMICK re mktg plans 170403, WMT MCCORMICK on price drop 170412, WMT MCCORMICK buyer contacts 170425, WMT China Beef ref from MCCORMICK 170703, WMT connects China on beef 170703, WMT China Zheng initial contact 170704, WMT China Zheng merch support 170707, WMT China Zheng ROM pricing 170708, Willmeng Jarvis Tom Contact Info 150808, WO Intent to Proceed Brewer corp apt rental inquiry 150809, </p>
--	---

	<p> WO Team Initial Mtg LAX 150914, WO Plant Kickoff Salinas Mtg 150916, WO Plant Willmeng ref from Sayre 150917, WO Status Report ADAMSON PPM 150917, WO Team re PPM S-1 processes 150921, WO Plant Kickoff Salinas Mtg 150922, WO Plant Willmeng contract draft 151012, WO Plant Willmeng kickoff meet Oct 27 151019, WO Plant Willmeng cost workup status 151021, WO Status Report Jabor and Sales 151022, WO Hyder Farm CASTRO on Oliver 151028, WO Weekly Status Report reaction PETERSEN 151029, WO Hyder Farm Terminal Estimate to Oliver 151030, WO Sales Fresh Express Smith contact 151104, WO Grt Western Bk local takeover visit 151117, WO Team on Jabor Funded on Time 151117, WO Team re Jabor snag 151118, WO Team on financings 151120, WP Paypal Acct Detail Sep-Dec 151231, WO Team on 179mm Financings 160101, WO Status Financings 160121, WO Financings deal status to team 160208, WO Status Kingman Startup Financings 160209, WO Status Report financings 160421, WO Status re Oliver Term Sheet Verbal 160719, WO Status Final Oliver Hyder present sked 160804, WO Status Hyder Oliver rework 160818, WO Status DD Fin Sales 160929, WO Status Report on Hyder Oliver new pitch status 161006, WO on WMT progress 161018, WO Status financings 161103, WO Status Financings WMT KROGER 161115, WO Status KROGER projection incl 161226, WP Great Western 2016 DDA Account 161231, WO Org Chart 170111, WO Blitch re ofc space tour 170118, WO Status Report REED Wood join 170119, WO Team re Gerlach soi tests 170201, WO Blitch re Stockton Hill Famr tour w BLACKPOOL 170203, </p>
--	--

	WO Smith CFO re Revolution VC pass 170203, WO Status Rpt Stockton Hill Update 170209, WO Status Rpt incl WMT status 170223, WO Team re Blackppol to fund 170301, WO Team re BLACKPOOL no reply stringout 170309, WO Team re BLACKPOOL deadline miss 170310, WO Status Report DD retainer need 170320, WO also CARDONE on Status WMT others 170403, WO Team WMT dead Alb on track others 170404, WO Status Skaar 170504, WP Executive Summary Bus Plan 170507, WO Status Report Skaar Investor Interest 170515, WO Team Smith CFO Termination Notice 170612, WO Team Smith CFO Termination 170613, Zaharis re Cowley Kodiak Produce temp cooler space 170206
--	--

686. *RICO-48 Racketeering Violations: Dishonest Professional Services, Employees, Recruiters, Various Positions 2011-2022*

A. Defendants with police powers have and do electronically hack Lead Plaintiff's personal computer and the websites presented to Lead Plaintiff thereon. Defendants have and do engage in repeated blocking of access to legitimate business recruiters, repeatedly substitute their own fraudulent executive recruiters and place fraudulent employees in Lead Plaintiff owned and managed companies to arrange the hiring of defendants' own screened-in personnel and confidential informants. Defendants have and do also refer other professionals and firms as service providers for design and architectural services, and as suppliers, to supplant legitimate suppliers of plant and equipment which are essential to meeting customer needs of the various businesses which Lead Plaintiff owns, controls, and/or manages.

B. These *First* Amendment violations and associated-in-fact enterprise patterns of racketeering act mail and electronic frauds repeat many hundreds of thousands of times, including, for example, defendant police powers agents, officers, or confidential informants

Rafael GOMEZ, domiciled in California slated to be Director – Food Safety and Eric Galkin, domiciled in New York state, slated to be Director- Procurement, once permanent financing can be arranged for various entities owned and controlled by Lead Plaintiff. These and other fraudulently entered police powers personnel are recruited through online job postings on spoofed websites, and by an Indeed.com online contract recruiter. These contractors and personnel have and do continue these defendants’ pattern of racketeering acts while interfering in and affecting interstate commerce and engaging in on-going entrapment attempts and entanglements of the Lead Plaintiff in other investigations in local, state, and federal interstate jurisdictions.

C. These online frauds and swindles have run from the first instance of Lead Plaintiff’s use of a personal computer in the 1980s to the present for personal job hunts and for business recruiting as Lead Plaintiff has and does primarily use these online tools for this purpose while defendants, in particular defendant UNITED STATES has and does use wire fraud and email fraud, in both in-state and interstate commerce to manage the Lead Plaintiff by controlling his employment and destroying his private enterprises to perpetuate Lead Plaintiff’s human trafficking, involuntary servitude, and forced labor; and their violations of the *First, Third, Fourth, Fifth, Eighth, Ninth, Thirteenth, and Fourteenth* Amendments, and other civil, Constitutional, and human rights under international law and ratified treaties.

D. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants’ long-running schemes, frauds, and swindles to sustain defendant UNITED STATES’ involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent,

to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	681-690 RICO-43-52 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0001, 2-0036, 2-0045, 2-0050, 2-0053, 2-0072, 2-0081
LPEE pages (see technical note on page numbering at paragraph 230):	371, 473, 474, 486, 544, 549, 566-573, 575-576, 599, 603, 609-612, 616-765, 770-771, 783, 8479, 9181, 9820, 10179-10186
Emails and documents by topic and date, also located in LPEE:	Blitch re contract fertilizer packaging 170526 BREED email Offer Letter 170115, BREED Offer Letter 170115, BREED on Stockton Hill Farm Kingman 170129, BREED on Stockton Hill Farm offer progress 170131, BREED re Gila Bend lead 170131, BREED re Stockton Hills tour 170209, BREED refs VP Grow candidate 170210, REED Bill REED Disclosure Letter Winnett Organics 17.01.2017.pdf Canchola phone number change 200727, CASTRO CA VP-Ops Intvw 150825, CASTRO CA re Mota Dir Ops add 150901,

	<p> CASTRO introduces Gerlach to DB ARPAIO 151106, CASTRO re financings 151120, CASTRO re Hyder Water Quality 151126, CASTRO on Dole Gerlach 160125, CASTRO on lettuce production detail 160214, CASTRO on Kingman Farms status 160304, CASTRO progress report 160427, CASTRO re Hinson Lyle proposal via ARPAIO 160513, CASTRO on Aqua 4D saline water trmt 160608, CASTRO re personnel rqmts 160705, CASTRO re Aqua 4D Giora bkfst miss and Oliver mtg 160719, CASTRO on Aqua4D in Oliver Hyder budget 160731, CASTRO on budget format Oliver Hyder 160801, CASTRO on resignation 160810, CASTRO Separation Agreement 160811, CASTRO Separation Agreement to SULLIVAN 160811, CASTRO connection Aqua 4D Giliad email samples 161101 CFO Smith entrap attempt backdating 161016, Galkin NYCDir Procuremnt 200824, Galkin is vehicle for procurement contacts dump 200826, Galkin fishing expedition and leave 200831, Galkin KUMIN on quote requests 200831, Galkin re termination after source strip via Indeed 200924, GOMEZ Dir Food Safety Intvw 150829, GOMEZ refers Brereton Hamilton 160407, GOMEZ re investor call request 160408, GOMEZ re investor interest 160427, GOMEZ on Costamanga mtg plan 160429, GOMEZ update on CA investor progress 160506, GOMEZ Costamanga mtg request 160508, GOMEZ re new investor leads 160512, GOMEZ investor update 160525, GOMEZ re Japanese Inv Lead sales progress 160616, GOMEZ update Kevin investor 160704, GOMEZ re Costamanga mtg 170203, GOMEZ re Brereton has organic cattle in TX 171228, Hansen AgriPlacment Glandt refers NICKLESS 170710, NICKLESS initial hits re 170803, NICKLESS initial hits re Skaar 170803, </p>
--	--

	<p> NICKLESS on status 170818, NICKLESS sources a TX feedyard 171229, NICKLESS re HEC Friona eqpt 180116, NICKLESS re HEC price drop 180116, NICKLESS re HEC LOI 180117, NICKLESS on Rio Bravo fake finls 180213, NICKLESS Ops re Galkin Procurement 200811, NICKLESS Ops re Galkin Procurement contract 200811, NICKLESS re Korea sales pgm 210116, NICKLESS re Big Sandy 210217, NICKLESS re Big Sandy Housing 210307, NICKLESS on Lake County tour 210709, NICKLESS re Intl Trader Termination 210917, PAUL SMITH Resume 170308, Smith CFO Stock Option Agreement Signed After Backdating Request 10176-10178 POINDEXTER VP Sales intvw Kingman later 150826, POINDEXTER Kingman veg crops 151001, POINDEXTER Kingman tour Jim RHODES intro 151007, POINDEXTER direct RHODES re Kingman 151017, Recruiter Connections Plus DeLeon Recruiter 150903, Recruiter Connection Plus DeLeon ref WASEMAN 150911, Recruiter Connections Plus DeLeon submits WASEMAN 150915, Recruiter Connections LEBLOND subord searches 150928, Recruiter Connections Smith CFO subord 151117, Recruiter Connections DeLeon on WASEMAN fee160229, Recruiter Connections JBN Contingency Fee Agrmt 160414, Recruiter Connections JBN 160414, Recruiter Connections DeLeon update WASEMAN 160513, Recruiter Connections JBN 160513, Recruiter Connections Plus DeLeon 160513, Recruiter Connections DeLeon re WASEMAN start160627, Recruiter Connections Plus DeLeon on WASEMAN fees 170307, Recruiter Connections Agricareers 170615, Recruiter Connections Glandt 170630, REED VP Ops intvw Lunch Tucson 150831, REED re Gerlach 170127, REED on Stockton Hill Farm Kingman 221028 170129, </p>
--	---

	REED re Stockton Hill Status 170130, REED xmits Stockton Hill Rd LOI draft 170209, REED re Black Rock visit 170304, REED to GOMEZ on Bacak Rock Farm Maps Gerlach 170305, REED on Jiim RHODES ppty 170311, REED on RHODES Peacock Highlands 170313, REED Gerlach assessment 170315, REED Gerlach Plan B Memo UTAH 170320, REED re Gerlach Assessment 170320, SBI first accesible email Canchola 200709 Task Worksheet – Brewer CEO 10179-10180 Task Worksheet – Blitch CIO 10181-10182 Task Worksheet – Smith CFO 10183-10184 Task Worksheet – Vindiola Dir HR 10185-10186 WO Blitch re ofc space tour 170118, WO Status Report REED Wood join 170119, WO Blitch re Stockton Hill Famr tour w BLACKPOOL 170203, WO Smith CFO re Revolution VC pass 170203
--	--

687. *RICO-49 Racketeering Violations: Dishonest Professional Services, Employees, Recruiters, Logistics 2015-2021*

A. Numerous defendants’ police powers agents, officers, confidential informants, members of the media and other persons with privileged access have and do pose and present themselves as prospective employees of one of the Lead Plaintiff’s commerce and interstate commerce business entities. While myriad persons have played such fraudulent roles, Jason WASEMAN was the only individual who requested and accepted payroll direct deposits. Two payments are made through the ADP payroll service for payroll amounts and ADP fees deposits directly to WASEMAN’s personal accounts by Winnett headquartered in New Jersey, to WASEMAN then a resident of Arizona. Other fraudulent employees and potential employees had stock and stock option grants including, without limitation, CASTRO, NICKLESS, PAUL SMITH, BLITCH, CANCHOLA, REED, MOTA, CASTRO, VINDIOLA, LEBLOND,

GOMEZ, WOOD, FOLAND, REED, SULLIVAN, ARPAIO (Crossgrove), (paragraph 668 RICO-30). Note that several of these individuals also had military (DOD, ARMY, NAVY, AIR FORCE) and/or international employment (CIA commercial cover in certain instances) experience, including in military and CIA paramilitary special operations, a recurrent theme among the individuals who were assigned to employment stints with the Lead Plaintiff by defendant UNITED STATES and other defendants. These personnel were substituted by defendants including, without limitation, UNITED STATES for and consumed resources intended for use in legitimate interstate commerce in Lead Plaintiff's various private enterprises.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as

well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	5
Complaint paragraphs:	681-690 RICO-43-52 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0001, 2-0171, 2-0172, 2-0174, 2-0176, 2-0177
LPEE pages (see technical note on page numbering at paragraph 230):	616-765, 9256-9259, 9636-9637, 9639, 9727-9728, 9820, 9987, 9991-9993
Emails and documents by topic and date, also located in LPEE:	<p>Recruiter Connections Plus DeLeon Recruiter 150903, Recruiter Connection Plus DeLeon ref WASEMAN 150911, Recruiter Connections Plus DeLeon submits WASEMAN 150915, Recruiter Connections DeLeon on WASEMAN fee160229, Recruiter Connections DeLeon update WASEMAN 160513, Recruiter Connections Plus DeLeon 160513, Recruiter Connections DeLeon re WASEMAN start160627, Recruiter Connections Plus DeLeon on WASEMAN fees 170307, Rose Jordan Contingency Agreement-Winnett Organics Signed 150824.pdf WASEMAN re Tucson ofc tour 160604, WASEMAN re intvw new VP Ops Bill REED 170104, WASEMAN re Stockton Hill Farm 170310, WASEMAN re WMT China logistics and fulfillment process 170926, WASEMAN history disappeared new email acct needed 210104, WASEMAN NICKLESS re Korea sales pgm 210115, WASEMAN ref request 210525, WASEMAN ref request fup 210526, WASEMAN checkin re WMT organic beef 210616, WASEMAN re cold chain fulfillment 210830, WASEMAN re cold chain launch timing 210830 WASEMAN I-9 scan0010 180315.pdf</p>

688. RICO-50 Racketeering Violations: Dishonest Professional Services, Employees, Sales

A. Peter LEBLOND was recruited as Vice President of Sales and Marketing at WinnettOrganics in 2015, the organic fresh produce business entity managed by the Lead Plaintiff with planned operations in Maricopa County, AZ. He aggressively requested, complained, then accepted two payroll advances totaling \$7500 and claimed close relationships with senior executives at several large grocery retailers, then left Winnett before turning these commitments into sales contracts, depriving Winnett (trade name then WinnettOrganics) of his honest services while fraudulently securing financial resources through his misrepresentations. Discovery will show LEBLOND was another in the long series of carefully screened-in police power agents, officers, and confidential informants used to strip company financial resources, interfere with legitimate interstate commerce activities; and to contribute to the company's financial destruction using mail fraud, wire fraud, and other frauds and swindles in conspiracy with other fraudulent WinnettOrganics team members herein, including defendant Joseph ARPAIO in 2014-2017. while MARICOPA SHERIFF and individually.

B. Two other fraudulent cover candidates for sales and sales leadership positions introduced by defendants included William TARAZEWICH, domiciled in the Dallas, TX area slated to be Vice President of Sales and Marketing in 2016; and Brad KUMIN, domiciled in Houston, TX as a Sales and Marketing contractor also slated to be Vice President, Sales and Marketing who operated in bad faith as a sales contractor in 2020-2021 while FBI continued its long-running pattern of interferences in interstate commerce including, without limitation, fraudulent financings (paragraphs 668, 670, 672 RICO-30, 32, 34) and fraudulent domestic and international sales leads (paragraphs 673-680 RICO-35-42).

C. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	681-690 RICO-43-52 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0001, 2-0171, 2-0172, 2-0174, 2-0176, 2-0177
LPEE pages (see technical note on page numbering at paragraph 230):	616-765, 8489-8506, 8715-8718, 8813-8854, 9920, 10179-10186
Emails and documents by topic and date, also located in LPEE:	KUMIN Ind Contr TX 200710, KUMIN re China Supplier Search 200710, KUMIN re China chicken price diff 200721, KUMIN sales and fulfillment options 200723,

	<p> KUMIN TX re third party supplier 200724, KUMIN re ABT FL sales contract 200728, KUMIN re ABT pork 200728, KUMIN Craft re rferaal agrmt 200731, KUMIN Craft referral agrmt 200629 sent 200731, KUMIN re ABT 200801, KUMIN ABT 200802, KUMIN ABT pork inquiry 200803, KUMIN re Thomas Referral Contract and NCNDA 200930, KUMIN LOA announcement 201015, KUMIN re China mkt dev 201207, KUMIN takes LOA 210120, KUMIN re his status 210813, LEBLOND CA VP Sales Intvw 150825, LEBLOND re KROGER connection 150910, LEBLOND sales update 150917, LEBLOND sales update 150928, LEBLOND 5K advance 150930, LEBLOND re 2500 advance 151117, LEBLOND re status 160525 LEBLOND Hire Release Signed 160107.pdf TARAZEWICH TX re VP Sales position 160420, TARAZEWICH TX re RAM on Maines other progress 160503, TARAZEWICH TX re Maines fail others in flux 160506, TARAZEWICH TX refers ibanker 160527, TARAZEWICH TX re financing progress 160616, TARAZEWICH accepts alt employ 160706, TARAZEWICH TX loan 2500 160725, TARAZEWICH TX loan 2500 demand 170419, </p>
--	---

689. RICO-51 Racketeering Violations: Dishonest Professional Services, Employees, CFO

A. Defendant FBI police powers agent, officer, or confidential informant as DEAN SMITH, President of Mountain Pacific Machinery in Portland, Oregon” introduced his brother, “PAUL SMITH, Boulder, Colorado” in 2017 as a candidate for CFO of Winnett. Paul was selected by Lead Plaintiff based upon his resume, a phone interview, and emails. Among the

defendants' police powers agents, officers, and confidential informants posing as current or prospective employees of one of the Lead Plaintiff's private interstate commerce business entities, PAUL SMITH (FBI) was the only individual who requested back-dated stock options and then delayed signing the properly dated stock options offered for months. Back-dating is an illegal act and is an example of one more of the vast series of entrapment attempts and frauds by defendants acting under the color of law without reasonable suspicion or any sound legal basis for their actions.

B. Defendant UNITED STATES also introduced Michael Dooley from Colorado in 2011; Dennis Merck from Oregon in 2012; and through a fraudulent cover operation CFO SEARCH, Inc. and executive recruiter Michael MAGGARD introduced Ibrahim ABDELSAYED in 2021 as another CFO candidate (paragraph 478, 624D, E RGTS-4), all under false pretenses to sustain their involuntary servitude of Lead Plaintiff and thwart and conspire to thwart his numerous attempts to engage in interstate commerce.

C. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953).

Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	478, 624D, E RGTS-4, 681-690 RICO-43-52 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0001, 2-0171, 2-0172, 2-0174, 2-0176, 2-0177
LPEE pages (see technical note on page numbering at paragraph 230):	616-765, 10176-10178, 10179-10186
Emails and documents by topic and date, also located in LPEE:	ABDELSAYED on market 200710, ABDELSAYED re status 200724, ABDELSAYED PAINTER re loan gty 200730, ABDELSAYED on est start dates team 200821, ABDELSAYED re loan gty 200821, ABDELSAYED signs loan form 200822, ABDELSAYED 201123, ABDELSAYED and WASEMAN Covid DB no vax appt Bergen 210120, ABDELSAYED re 26 Ranch 210219, ABDELSAYED re status 210302, ABDELSAYED pg decline 210716, ABDELSAYED inquiry on status 211202, ABDELSAYED re cancel email address 220114, D Merck Stock Cert 3 121202, Dooley Hook to EB-5 110922, MAGGARD TX re ABDELSAYED 200722, MAGGARD TX re ABDELSAYED start date 200817, MAGGARD TX re ABDELSAYED 200722, MAGGARD TX re ABDELSAYED start date 200817, MAGGARD TX status 201015,

	<p> MAGGARD re Korea Angus pgm etc 210118, MAGGARD re 26 Ranch and ABDELSAYED 210221, MAGGARD on ABDELSAYED positive connect 210222, MAGGARD re ABDELSAYED 210302, MAGGARD re ABDELSAYED to Egypt 210304, MAGGARD on loan docs PFS need 210306, MAGGARD re gty and PFS 210307, MAGGARD re Big Sandy BAFO 210322, MAGGARD re Big Sandy reprise 210505, MAGGARD re investors and Big Sandy 210519, MAGGARD re Lake County LOI 210701, MAGGARD re Lake County 210702, MAGGARD re 500k loan 210703, MAGGARD enroute Lake County 210707, MAGGARD re Lake County enroute 210707, MAGGARD re Lake Copunty tour and plus minus issues 210709, MAGGARD re Lake County and pers FICo improvement 210715, MAGGARD re Lake County 210719, MAGGARD Loan to DB improving FICO 210721, MAGGARD re Lake County 3559 LOI 210721, MAGGARD on Lake County Fin snags 210725, MAGGARD on WMT Wagyu comp price and other status 210804, MAGGARD re startup sequencing plan 210816, MAGGARD re status web dev sales 210816, MAGGARD re add subs WEFUNDER 210817, MAGGARD re GAAP fin need 210818, MAGGARD re mkt gap 210818, MAGGARD 5k GPR loan 210826, MAGGARD re 4500 loan recvd 210826, MAGGARD Revised GPR Startup Plan 210830, MAGGARD re DB overadvance 210901, MAGGARD re loan not pursued 210903, MAGGARD re 26k loan 210909, MAGGARD re ICPO LOI-FM-LZ-210913, MAGGARD re Terminating Trader efforts 210916, MAGGARD re status 211104, MAGGARD re 700 211221, CFO Smith entrap attempt backdating 161016, </p>
--	--

	Smith CFO Stock Option Agreement Signed After Backdating Request 10176-10178 Smith CFO re BELLI invoices 151105, Smith CFO re Jabor confirms xfr BkTucson rejects 151113, Smith CFO on avoiding expenditures 151119, Smith CFO reports CASTRO determines Jabor is scam 151119, Smith CFO KEISER re PPM wire xfr 151123, Smith CFO re PPM Expert Fees Paid160103, WO Smith CFO re Revolution VC pass 170203, WO Team Smith CFO Termination Notice 170612, WO Team Smith CFO Termination 170613
--	--

690. RICO-52 Racketeering Violations: Dishonest Professional Services, Employees, Controller 2018

A. Lori ALVAREZ, an agent, officer, or confidential informant of defendants posing as an accountant contractor and prospective employee of a Lead Plaintiff business entity is paid to attend an online store kickoff meeting in 2018 in Avondale, Maricopa County, Arizona, for a web-based wholesale beef supply store, along with Chris CANCHOLA and Jason WASEMAN, also scheduled to become business entity team members. Defendant UNITED STATES blocks access to the online store and blocks or fails to deliver email business solicitations for this store around this same time (paragraph 676, 677 RICO-38, 39). See this \$854 interstate payment to ALVAREZ, an Arizona resident by Winnett, the Colorado organized and New Jersey domiciled business entity below.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent,

to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	5
Complaint paragraphs:	676, 677 RICO-38, 39; 681-690 RICO-43-52 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0001, 2-0171, 2-0172, 2-0174, 2-0176, 2-0177
LPEE pages (see technical note on page numbering at paragraph 230):	616-765, 9649, 9651, 10013
Emails and documents by topic and date, also located in LPEE:	Not applicable

691. RICO-53 Racketeering Violations: Fraudulent Production Asset Purchase Options, Professional Services 2015-2021

A. Defendant UNITED STATES and co-conspirator defendants' frauds against the Lead Plaintiff have repeatedly caused extensive time, effort, and expenses to be incurred for interstate travel, office products, overhead, and staff expenses for professional services. These services

were used to develop concepts, process designs, and conduct plant location analysis, equipment selection and design analyses, and architectural design requiring services, travel, and other expenses by Lead Plaintiff's companies and, at times, by legitimate prospective suppliers engaged in in-state and interstate commerce. Defendant UNITED STATES holds an additional thousands of pages of documents, emails, business plans, proposals, studies, and other relevant materials dating from earlier periods to 2006 as this electronic evidence was delivered into the hands of defendant ROSENBERG at ESTABLISH in October or November, 2007. It is also probable that further paper evidence was photographed or scanned during mailing between New Jersey and Washington by Lead Plaintiff and also resides in the hands of defendant UNITED STATES.

B. Fraudulent agricultural production and processing related assets were and are listed online by defendants, who simultaneously deprived Lead Plaintiff access to actual agricultural and ranchland listings, as elements of their conspiracy to and pattern and practice of acts depriving Lead Plaintiff and his related entities of their right to pursue and benefit from commerce and interstate commerce. The overriding intent of defendants, with regard to these violations, was and continues to be, to consume the financial resources and management time of Lead Plaintiff and the entities he legally owns, controls, and/or manages. This pattern of continual interferences with constitutional rights and with interstate commerce by this associated-in-fact enterprise has recurred across time from 1968 to the present.

C. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT

development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	691-693 RICO-53-55 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	Not applicable
LPEE pages (see technical note on page numbering at paragraph 230):	See disbursements and travel at LETHL-1 and compendium 2015-2021
Emails and documents by topic and date, also located in LPEE:	26 Ranch Clark re PPM stock swap 151016, 26 Ranch Terms Marvel 160107, ARTUSO re plant design 200722, ARTUSO on plant progression 200901, ARTUSO update 210409, BDO SLC initial contact 170727, BDO SLC to DD NYC connection 170807, BELLI intital hit 141217, BELLI on payment 160304, BELLI on investor sales progress 160608, BELLI on status 160811,

	<p> BELLI on organic mkt conditions 170802, BELLI on progress lack of 180117, Big Sandy Ranch sub debt RFQ 210314, Bretz Hutchins on HEC E6 Double D feedyards 180120, Bretz re E6 proof of funds conflict w investor 180208, Burgess Salmon 1 re London Closing 140917, Burgess Salmon 1 re London Closing 140918, Caviness CS Cattle re finishing contract potential 200901, Caviness on plant availability for slaughter pending order 210617, Caviness re slaughter availability 210915, CCW ARTUSO on plant design 200722, CCW ARTUSO Case Ready Plant email to 3rd party 200807, CCW Artuso re engrng recommendation 200811, CCW ARTUSO on plant progression 200901, CCW ARTUSO on plant Dematic study 210114, CCW Artuso update 210409, CCW ARTUSO on Dematic study 211014, Colliers re Dev prtnr IN plant 200819, Colliers Powers check in 220118, Cresa Realty Advisors AZ Office Search 180904, Dallam Cty LOI Farm HULL LOI 0001 120809, DD on WMT Swisslog 161230, DD re 5 yr plan to WMT 161231, DD Callahan (KEENE) re 170124 Swisslog mtg 170109, DD Callahan (KEENE) re Swisslog mtg 170109, DD Callahan (KEENE) re lending DD name to WMT presentation 170126, DD Callahan (KEENE) re Swisslog mtg fup 170126, DD re Rabo ID Skaar 170503, DD Skaar Site Plan Barns Winnet Site Opt 8 170509, DD Transom re Skaar 170512, DD on Skaar fert option 170513, DD Skaar Barns Detail Site Opt 8 170523, DD Fleming on DD Finl Model 170526, DD Callahan (KEENE) re PE dilutive 170531, DD on Skaar Organic Fertilizer Mkt Size 170531, DD on Skaar Organic Fertilizer Plant Ops 170531, DD on Skaar Organic Fertilizer Plant Concept Plan 170601, </p>
--	--

	DD Skaar Royal Chem CAS numbers Contract Fert Pkg 170604, DD Skaar Site Plan 170605, DD Skaar Site Plan Ammonia Recovery Manure 170605, DD Skaar Organic Fertilizer Effectiveness 170607, DD Skaar Organic Fertilizer Pricing 170607, DD Skaar PE Investor Bid email 170607, DD Skaar PE Investor Bid form 170607, DD re Centerboard Housing Solution WO 170608, DD WCC teaser draft 170608, DD Skaar Organic Fertilizer Production Cost 170609, DD Callahan (KEENE) re funding sked 170612, DD Skaar Organic Fertilizer Advantages 170614, DD WCC Pitch Deck Skaar etal 170614, DD Callahan (KEENE) on DeSai 170616, DD Skaar Bidding Process to SANDERS 170616, DD Callahan (KEENE) on AXIAL lead Chatham 170619, DD Skaar Site Plan Mods 170619, DD NGEN fake NYC investor 170622, DD NYC VAN BRAKEL 170622, DD Callahan (KEENE) re AGIS NDA cmu not credible 170628, DD Skaaar AgIS Boston 170628, DD Skaar Advantage NDA 170628, DD Skaar AgIS Boston 170628, DD Callahan (KEENE) re Skaaar visit sked 170726, DD on HIG Capital Miami 170728, DD Skaar site visit Sander 170728, DD JJU - Winnett Cattle Target Tracker_8_4_17 170804, DD Skaar BDO Auditor SLC Gordon 170804, DD Skaar BDO Auditor SLC Gordon 170807, DD NYC Callahan (KEENE) connects to BDO SLC 170808, DD Skaar Callahan (KEENE) Update 170809, DD LABELLE Teton County 240 Tour Pass 170810, DD Skaar Cost per pound gain 170811, DD Skaar LOI xmit 170811, DD Skaar LOI signing 170821, DD Skaar past contacts 170821, DD Skaar Teton River Farm Feeney email 170822, DD Skaar rcv Alt Offer 170828,
--	---

	DD Skaar Teaser 170905, DD Callahan (KEENE) re no progress 170906, DD Skaar Site Plan Barns Winnet Site Opt 8 170509, DD Transom re Skaar 170512, DD on Skaar fert option 170513, DD Skaar Barns Detail Site Opt 8 170523, DD Fleming on DD Finl Model 170526, DD Callahan (KEENE) re PE dilutive 170531, DD on Skaar Organic Fertilizer Mkt Size 170531, DD on Skaar Organic Fertilizer Plant Ops 170531, DD on Skaar Organic Fertilizer Plant Concept Plan 170601, DD Skaar Royal Chem CAS numbers Contract Fert Pkg 170604, DD Skaar Site Plan 170605, DD Skaar Site Plan Ammonia Recovery Manure 170605, DD Skaar Organic Fertilizer Effectiveness 170607, DD Skaar Organic Fertilizer Pricing 170607, DD Skaar PE Investor Bid email 170607, DD Skaar PE Investor Bid form 170607, DD re Centerboard Housing Solution WO 170608, DD WCC teaser draft 170608, DD Skaar Organic Fertilizer Production Cost 170609, DD Callahan (KEENE) re funding sked 170612, DD Skaar Organic Fertilizer Advantages 170614, DD WCC Pitch Deck Skaar etal 170614, DD Callahan (KEENE) on DeSai 170616, DD Skaar Bidding Process to SANDERS 170616, DD Callahan (KEENE) on AXIAL lead Chatham 170619, DD Skaar Site Plan Mods 170619, DD NGEN fake NYC investor 170622, DD NYC VAN BRAKEL 170622, DD Callahan (KEENE) re AGIS NDA cmu not credible 170628, DD Skaaar AgIS Boston 170628, DD Skaar Advantage NDA 170628, DD Skaar AgIS Boston 170628, DD Callahan (KEENE) re Skaaar visit sked 170726, DD on HIG Capital Miami 170728, DD Skaar site visit Sander 170728, DD JJU - Winnett Cattle Target Tracker_8_4_17 170804, DD Skaar BDO Auditor SLC Gordon 170804,
--	---

	DD Skaar BDO Auditor SLC Gordon 170807, DD NYC Callahan (KEENE) connects to BDO SLC 170808, DD Skaar Callahan (KEENE) Update 170809, DD LABELLE Teton County 240 Tour Pass 170810, DD Skaar Cost per pound gain 170811, DD Skaar LOI xmit 170811, DD Skaar LOI signing 170821, DD Skaar past contacts 170821, DD Skaar Teton River Farm Feeney email 170822, DD Skaar rev Alt Offer 170828, DD Skaar Teaser 170905, DD Callahan (KEENE) re no progress 170906, DD Skaar SANDERS tours Frank MAUGHAN BDO 170913, DD Skaar Sander re Kritser 170921, DD Skaar SANDERS on revised structure 170929, DD Skaar SANDERS Update 171013, DD Skaar SANDERS re Kritser Friona Ind ExCEO call 171022, DD Skaar WMT China ND Rep Sr Legislator BANCO Advisors 171024, DD Skaar Revised Buyout 171112, Dematic Proposal to WASEMAN 161228, Dematic 200720, Dematic 200806, Dematic2 200806, Digested Organics WO Proposal 1 page DD 170531, Digested Organic 1 pager 170601, Digested Organic on processing cost per gallon 170609, Digested Organic liq fert offering 171107, Digested Organic liq fert offering referrals 171116, Euro pig trailers 210427, Feedex UAE Export Quotes ref from Phillips 201209, Feedex Phillips update 210224, Feedex re their catalog our volumes 210312, Feedex update 210420, Feedex re organic dairy in Earth TX 210604, Freelancer disappearance on Chinese beef label 210907, Full Circle Compost Cody Witt Invoice 170331,
--	--

	<p>G3 Vancouver BC Terminal Transit for AGI Quote Request 211130,</p> <p>Gearn Ibach on HEC feedyard 171231,</p> <p>Gearn Ibach on state of HEC feedyard 180104,</p> <p>Gearn Ibach NICKLESS re HEC design reconfig 180118,</p> <p>Gearn Ibach HEC design discusssion 180119,</p> <p>Gearn Ibach re halt work as HEC gone 180126,</p> <p>Google Ads circular response to initial ban info request 210805,</p> <p>Hartman re GROSS organic mkt research inquiry 210520,</p> <p>Hartman re refs and experience 210525,</p> <p>Hartman Group re Organic Mktg Study for GROSS Mark 210603,</p> <p>Heuer MO on timing 200720,</p> <p>JBS WILLIAMS Organic Beef 170523,</p> <p>JBS on Natural Cattle Production Projection 170530,</p> <p>JBS re natural program for customer 170818,</p> <p>JBS WMT is customer for JBS program inquiry 170818,</p> <p>JBS Stevens re WMT China natural cattle processing Hyrum 171002,</p> <p>JBS Hyrum Rawlings 171108,</p> <p>JBS Rust re plant slaughter capacity 210116,</p> <p>JBS Bradbury re slaughter pgm 210119,</p> <p>JBS chicken pork quote requests 210126,</p> <p>JLL Sayre AZ check in 170926,</p> <p>LONERGAN re BRF China 210125,</p> <p>Luckhart pig trlr quote request 210428,</p> <p>Luckhart pig trlrs and transport 210428,</p> <p>Lux re virtual ofc svcs 161021,</p> <p>Lux ofc switch WASEMAN 161022,</p> <p>Lux 1 of many credit card decline 170301,</p> <p>Lux DB advances rent Indian School Rd 180206,</p> <p>Lux AZ re rent Indian School Rd 180301,</p> <p>Marchal Semple CPA AZ 160125,</p> <p>Mijajlovic acctnt re billing 200804,</p> <p>Mijajlovic re deferral of billing 210325,</p> <p>Mijajlovic re no response email acct delete and status 210831,</p> <p>Mijajlovic checkin 220222,</p> <p>MO Contract Farmer Heuer 200921,</p> <p>OWB Brandt intro to Summers 180123,</p>
--	--

	<p> OWB Summers Korea Angus pgm 201214, OWB Korea suspension reply 201223, OWB Korea beef pgm 201226, OWB Summers slaughter availability 210116, OWB Summers Quote Request 210321, OWB re Utility Cattle for China 210609, OWB Summers Req 6 for deboning cost 210620, OWB Summers apology re telcon 210621, Oxbo Eqpt PO 1004_from_Winnett_Perico_Inc 170303, Oxbo Eqpt WP PO 170303, Oxbo Smith PO for 170306, Portable Vac Coolers Inquiry 160216, Royal Chem re organic liq fert 170530, Royal Chemical email price quote 170721, Royal Chemical drop on True misinformation 170723, Ryder re financing plan 160317, Ryder Nichols VP Sales Ramsey mtg 161201, Ryder Aquilino re startup sequence fin 161208, Sayre BELLI re Jabor scam 151119, Sayre AZ check in 170926, Southern Vacuum Coolers Inquiry 160216, Stampede Meats delay sales reply 4MM pound opptny 210317, Stampede Meats retail prepack RFQ 210317, Stampede Meats retail prepack RFQ questions 210319, Stampede re WMT China pricing reaction 210426, Sterling re further process beef 201226, Sure Fresh re bean processing 170309, Swisslog automation Jennings NYC in house 161101, Swisslog automation Jennings NYC in house 161107, Swisslog automation Jennings NYC in house 161205, Swisslog to WASEMAN re automation 161228, Swisslog Jennings re DD mtg and progress 170113, Swisslog re NYC meeting notes and fup 170126, Swisslog Deck DD mtg to WO team members 170128, Swisslog developer search 170316, Swisslog referral developer 170331, Swisslog ref Developer on PPDC costs 170402, Swisslog Dev Chain Berger 170405, Swisslog re ASRS investment 170515, Symbrosia Etzioni re methane reduction cattle trial 210731, </p>
--	---

	Symbrosia re LITIGATION transition 210928, True Fert re org fert samples 170719, Tucson Intel Ofc re temrination 161020, Tyson chicken re China no availability, alt pork contact 210201, Tyson re China mkt 180205, Uddermatic Martin re Uddermatic 180202, Uddermatic cutout 180206, Uddermatic feeding rates 180217, WestCoastPrime reatil prepack quote request 210313, Willmeng Jarvis Tom Contact Info 150808, Winnett Initial Property Search Email to Espy 110627
--	---

692. *RICO-54 Racketeering Violations: Fraudulent Production Asset Purchase Options, AZ 2015-2017*

A. Defendants initiated their Kingman Farms and Stockton Farms fraudulent sales and financing frauds in 2015 as Lead Plaintiff discovered the agricultural production asset acquisition opportunities they had planted online to acquire around 8,000 acres of irrigated farmland near Kingman, Arizona. This land would have supported Lead Plaintiff's planned organic produce production operation, WinnettOrganics (Winnett), a project then in sales and supply negotiation with defendants WALMART (Interline Exhibit 9) and MCCORMICK, among others. This elaborate fraud engaged several defendant FBI agents, across Las Vegas, NV, Kingman, AZ, and Phoenix, AZ who served as fraudulent Winnett employees, as realtors; and as Las Vegas real estate developer, James Rhodes, likely then suspected of bank fraud, financial fraud; as well as a tangentially related drug trafficking investigation involving employees of the Stockton Hill, Kingman, AZ farm's lessee operator indirectly disclosed by REED (FBI).

B. Defendants' fraudulent misrepresentation of an authentic asset sales and the alleged availability of owner financing for both Stockton Hill and Kingman Farms, and their entrapment

scheme failed in 2017 after many months of fraudulent scenarios and variations to be recounted at trial and on the emails and documents cited in this paragraph below. A financing allegedly available through defendant Jonathan CROSS related entities commonly known as BLACKPOOL and SHEFFORD, and allegedly with the participation of TIAA/CREF, a large scale pension and retirement funds manager failed. The Kingman Stockton Hill Farm deal collapsed after a series of delays, twists, turns, and more lies were piled upon the defendants' vast pile of lies, misrepresentations, and frauds. This complex sequence involved New York based defendant entities BLACKPOOL/SHEFFORD and DOMINICK, an Arizona and Nevada based realtor team (BROADWAY, VOLK), the Las Vegas Nevada based real estate developer (RHODES), and a Boston, Massachusetts based investor and former investment partner and land co-owner (represented by its officer SAUL), a one time a co-owner of a still larger farm with the Las Vegas developer (RHODES). Wire fraud, fraudulent offers of financing, and travel expenses paid by Winnett were used to perpetuate this sequence of human trafficking, involuntary servitude, and forced labor, while asset stripping and entrapment efforts continued.

D. Fraudulent agricultural production and processing related assets were and are furnished, by defendants, while simultaneously depriving Lead Plaintiff access to alternative sources, as elements of their conspiracy to and pattern and practice of acts depriving Lead Plaintiff and his related entities of their right to pursue and benefit from commerce and interstate commerce. The overriding intent of defendants, with regard to these acts, violations, and injuries was and continues to be, to consume the financial resources and management time of Lead Plaintiff and the entities he legally owns, controls, and/or manages.

E. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running

schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	691-693 RICO-53-55 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	Not applicable
LPEE pages (see technical note on page numbering at paragraph 230):	Not applicable
Emails and documents by topic and date, also located in LPEE:	Broadway AZ 16K acres Hyder 161005, Broadway AZ likely cutout msg 161006, Broadway Kingman Red Lake info 161020, Broadway KJV re BLACKPOOL CROSS sked arrival 170203, Broadway KJV re SAUL and Barings availability 170209, Broadway KJV re Stockton Hill Loans 170212,

	<p> Broadway KJV re well drill sub Stockton Hill Loans 170213, Broadway KJV xmit NDA dataroom access 170214, Broadway KJV escrow and psa to be drafted 170301, D Brewer Air Itenerary EWR PHX Hold for Anglade EWR 150830.pdf D Brewer Car Rental Itenerary EWR PHX Hold for Anglade EWR 150830.pdf D Brewer FS for SBI Surety Bond 413-NEW-as-of-7-30-2018 180730 .pdf D Brewer Hotel EWR PHX Hold for Anglade EWR 150830.pdf D Brewer Hotel Tucson EWR PHX Hold for Anglade EWR 150830.pdf D Brewer US Airways EWR PHX EWR 150830.pdf Kingman Land Swap status inquiry 160219, Kingman land legal des request 160223, Kingman Farm land swap 160224, Kingman Land Swap status 160224, Kingman Farms deal structure revision 160229, Kingman Farms RHODES discussion confirm 160229, Kingman status to team 160303, Kingman Farms deal structure revision 160304, POINDEXTER VP Sales intvw Kingman later 150826, POINDEXTER Kingman veg crops 151001, POINDEXTER Kingman tour Jim RHODES intro 151007, POINDEXTER direct RHODES re Kingman 151017, Oxbo Dump Carts WP PO 1008 170306.pdf Oxbo Eqpt email Purchase_Order_1004_from_Winnett_Perico_Inc 170303.pdf Oxbo Quote Winnett Organics 2475 x3 rev. 03.02.17 (2) 170306.pdf SAUL Barings Stockton Hill WO LOI RLV 170215, SAUL Stockton Hill WinnettOrganics LOI RLV 170215, SAUL re Stockton Hill Farms Structure 170217, SAUL Barings revise Stockton Hill WO LOI RLV 170218, SAUL Barings re LOI rev plans 170220, SAUL Barings status on BLACKPOOL financing 170224, SAUL Barings moving ahead BLACKPOOL financing 170301, SAUL Barings re sked pressure on fin 170303, SAUL to Fiera Comox 170804, </p>
--	--

	SAUL JV Structure incl Teton Valley Farm 170929, SAUL re Skaar Purchase Leaseback 170929, SAUL Barings WO Revised LOI Stockton Hill Farm 170218.pdf Zaharis re Cowley Kodiak Produce temp cooler space 170206
--	--

693. RICO-55 Racketeering Violations: Fraudulent Production Asset Purchase Options, OR, ID, TX 2015-2021

A. Defendants have repeatedly misrepresented farms and ranches as available properties for purchase by Lead Plaintiff business entities as part of their scheme to keep Lead Plaintiff engaged in expending time and financial resources to develop the productive capacity of his planned organic agriculture businesses. Among other elements, this includes presenting actually unavailable properties as available for purchase. One of these fraudulent sales was a 3559 acre ranch in Lake County, Oregon, presented by defendants (HUTCHINSON, AMSBAUGH, FBI). Lead Plaintiff spent more than \$700 to travel to and inspect this property. The specific emails and travel records related to this trip are currently blocked by defendant UNITED STATES, but a signed Letter of Intent is included in the evidence presented at the table below.

B. The outbound trip to Lake County, Oregon via Kennedy Airport, NYC to Seattle-Tacoma Airport near Seattle, WA, then to Redmond Airport, Redmond, OR for ground transportation to Lake County, OR by defendants' agent or officer (operating undercover, unknown to Lead Plaintiff at that time) included a thunderstorm delay and missed connection, forcing a late arrival and very brief overnight stay near Sea-Tac. See LPEE page 10095, noting disbursements on (yymmdd) 210706 Delta \$534.40, 210707 JFK \$22.90, 210707 Motel 6 \$2121.54, 210708 Africa Lounge \$23.81, SEPTA \$9.25.

C. Other email and wire predicate frauds of agriculture real estate and production facilities and related financing options include, for example, Julian Bros Sheep Ranch, Boulder,

WY fraudulent ranch sale listing as Big Sandy Ranch, in 2021 sale brochure and 2023 New York Times article at LPEE pages 10750-10771, and “LABELLE” emails listed below.

D. Fraudulent agricultural production and processing related assets were and are furnished, by defendants, while simultaneously depriving Lead Plaintiff access to alternative sources, as elements of their conspiracy to and pattern and practice of acts depriving Lead Plaintiff and his related entities of their right to pursue and benefit from commerce and interstate commerce. The overriding intent of defendants, with regard to these violations, was and continues to be, to consume the financial resources and management time of Lead Plaintiff and the entities he legally owns, controls, and/or manages.

E. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants’ long-running schemes, frauds, and swindles to sustain defendant UNITED STATES’ involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at

paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	691-693 RICO-53-55 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	Not applicable
LPEE pages (see technical note on page numbering at paragraph 230):	10750-10771, 10095, noting disbursements on (yymmdd) 210706 Delta \$534.40, 210707 JFK \$22.90, 210707 Motel 6 \$2121.54, 210708 Africa Lounge \$23.81, SEPTA \$9.25.
Emails and documents by topic and date, also located in LPEE:	26 Ranch Clark re PPM stock swap 151016, 26 Ranch Terms Marvel 160107, Broussard re Lake County fin 210710, Colliers re Dev prtnr IN plant 200819, Colliers Powers check in 220118, Cresa Realty Advisors AZ Office Search 180904, Dallam Cty LOI Farm HULL LOI 0001 120809, Eslabon Bretz Executed Winnett Cattle CA 12-22-17 171221.pdf Grasse Long Realty 160601, Grasse re properties search 160630, Guitierrez Ranch LOI Signed 140130, HEC feedyard email contract 180118, HEC feedyard NBH cattle loan 180119, HEC Feedyard NBH re loans 180119, HEC water lease contact 180119, HEC Bretz re Double D issues 180120, HEC Rio Bravo agrres to share fin data 3yr 180123, HEC contract redraft fm SULLIVAN 180124, HEC returns to mkt per NICKLESS 180212, HEC and E6 Blitch re workflow 180218, HEC E6 calf barns quote 180219, HEC E6 calf barn eqpt 180221, HEC E6 calf milk pasteurizing plant 180222, HEC E6 note sale to Summit 180222, HEC E6 Calf hutch housing option 180223, HEC E6 Calf barn floors 180228, HEC feedyard contract SKMBT_C654e18011814500 180118.pdf IntegratedAg initial web hit Prader 170516, LABELLE MJ hold add Big Sandy 210216, LABELLE re Big Sandy cmsn split w Theo list agt 210218,

	<p> LABELLE on Big Sandy Rejects First Offer 210222, LABELLE re contract for deed 210224, LABELLE on Big Sandy deal structure 210226, LABELLE re Big Sandy botton line from Theo 210301, LABELLE Big Sandy basic title info 210304, LABELLE on Big Sandy Ranch MAGGARD gty 210305, LABELLE re Big Sandy 210310, LABELLE re New Mexico comp AU pricing 210310, LABELLE Big Sandy BAFO 210317, LABELLE on Big Sandy BAFO DB reaction to rejection 210324, LABELLE re Big Sandy BAFO response to Theo comments 210324, LABELLE on Theo ping Big Sandy 210415, LABELLE re Theo and Big Sandy new interest 210506, LABELLE on Big Sandy structure and deal quantitties 210508, LABELLE re Theo Pearson Big Sandy behavior 210510, LABELLE on broker comments and Big Sandy 210514, LABELLE Big Sandy delay and deficient reply pattern 210517, LABELLE Pearson re Big Sandy deficient communications 210517, LABELLE Big Sandy drop 210617, Lake County 3559 Appraisal 210322, Lake County Appraisal 210322, Lake County OR Brandon 210627, Lake County Gannett Peak Ranch Mid-Case Business Plan 210628, Lake County OR Offer Mod 210629, Lake County Opptny Zone Investments cold email 210630, Lake County LOI 210702, Lake County Due Diligence folder link 210703, Lake County tour fup 210708, Lake County Creek Fishway project 210709, Lake County plant siting opptny zone 210710, Lake County 3559 Mike MAGGARD PFS 210712, Lake County Opptny Zone seller options 210712, Lake County seller re stock v loan 210713, Lake County Binding PurchSale Agrmt 210714, Lake County Prelim title report request 210719, Lake County Loan Options Disappear Ex 1of11 210725 Lake County 3559 AC MOL Signed LOI 210701.pdf Lake County 3559.45 Brochure.pdf LOI Farm Dickson Final 121211.pdf Marvel 26 Ranch rejects structure 160122, </p>
--	--

	<p> Marvel re Black Rock Famrs deal 170303, Nelson on dropping Yreka CA ranch no water 210614, Oppliger via Abacherli 180130, Oppliger Abacherli drops out 180209, Oppliger Abacherli ref to McDowel 180228, Renfrew CA Ashurst Ranch into escrow 210312, Royal Chemical Price Qte Org Fert Pkg 170721.pdf SBI team on Big Sandy BAFO deal fail 210324, SBI Team on Lake County 210701, SBI team on Lake County fin WMT mtg 210715, Skaar SANDERS Swan 170419, Skaar Winnett Cattle Company LOI Skaar 170429, Skaar Pitch Deck 170512, Skaar Sales Brochure 170512, Skaar JBS WILLIAMS on Organic Beef 170523, Skaar Teton River Ranch Broker ref Rumsfeld ref 170523, Skaar Barns 170530, Skaar Steam Flake Plant Cost Est Gearn 170530, Skaar Jeffereon Cty ID on Skaar Expansion 170731, Skaar Poulsen CPA appt 170731, Skaar WF Id Falls Kay Burke and SANDERS 170809, Skaar ID Dept of Ag rqmts 170810, Skaar outreach - US Bank reply delay arrange cutout 170817, Skaar Sander re US Bank established relationship 170817, Skaar Teton River Ranch Broker Feeney 170822, Skaar AGR interest initial hit 170828, Skaar Kritser Ranch Creek WA initial hit 170829, Skaar ClearLight initial hit 170905, Skaar Harris WILLIAMS re AGR 170906, Skaar SANDERS on strong interest Kritser Ranch Creek 170907, Skaar WF Id Falls Luke on sub debt 170915, Skaar Teton River Ranch Broker sale fail price drop Feeney 170925, Skaar Teton River Ranch Broker Feeney connects RL Holdings 170929, Skaar Teton River Ranch Broker Halgerson 171002, Skaar Kritser WA advisor John Herring Friona Ind 171030, (see also LPEE page 1074V, entries 9/7/2017 and 10/30/2017) Skaar deal dead Gerra 171208, Skaar SANDERS on alt buyer LOI 180124, Turpin Feedyard Purch Agrmt 144454 190703.pdf WILLIAMS LOI Dallam Cnty 800ac Farm HULL LOI 0001.pdf </p>
--	--

	Zeman Ranch 2 NE on famr sales process and investors 210605, Zeman Ranch broker discussion re investors 210605.
--	--

LETHALITY ATTEMPTS (LETHL series offenses)

694. LETHL-1 Lethality Attempts: British Columbia Sea to Sky Highway BRMT Melatonin Overdose, Mid 1980s

A. Lead Plaintiff was deliberately overdosed with melatonin to induce intense sleepiness while driving on the BC Highway 99 Sea-To-Sky highway south of Squamish, British Columbia, Canada near Porteau Cove by defendant UNITED STATES (CIA and/or ARMY) in approximately 1983. The Lead Plaintiff and his first spouse Lynne were together in the vehicle traveling south at about 50 to 60 miles per hour approximately eight feet from the unguarded edge of an 80 to 110 foot cliff adjacent to Howe Sound. Both would have been severely injured or killed if the Lead Plaintiff had failed to stop before being overtaken by the BRMT melatonin overdose in early afternoon after a full night of sleep. The evidence as to the specific date, time, and remote illegal BRMT instructions provided across the cell phone network to the cellular telephone equipment box in the vehicle's trunk which concealed the local BRMT bioweapon and bioweapon delivery system inside, which provide specific evidence of this event are likely to be available upon further investigation and discovery against defendants. Known illegal BRMT program, rights, and associated-in-fact enterprise racketeering principals in the region at this time were defendants WEISSMAN, ROSENBERG, HOPPER, and most probably BURNS who was not known to have been met under any cover by Lead Plaintiff until 1986, when he was introduced by STONE at LazerSoft as one of its Board members along with GARRISON, DeBon, and HOPPER, as Lead Plaintiff was trafficked from Deloitte Seattle to become

LazerSoft CFO. Bannon and THORPE were also employees at Deloitte Seattle and Zoulas at Westin during this period. REICHERT and BOYLE were senior officers at defendant KCSD during this period.

B. Defendant UNITED STATES most probably employed this method of extreme BRMT abuse to orchestrate the murder of Audrey Brewer in September 2011 (paragraph 10) using a physically and emotionally abused female intermediary as the direct perpetrator who acted in apparent extreme rage under the direct influence of the illegal BRMT bioweapon and bioweapon delivery system, which biochemically hijacked her pineal gland to provoke an extreme adrenaline level (fight or flight hormones), and the knife slashing attack which resulted in Audrey Brewer's death from the slashing of her carotid artery in her neck. The female perpetrator had absolutely no history of violence at any time but was also being psychologically provoked by the manipulative male who was involved in relationships with both females at various times. The psychological abuse of the apparent perpetrator was used in the moment as the concealment which hid the actual BRMT perpetrator of the extreme biomedical manipulation from view and exposure, since the illegal BRMT bioweapon's mere existence is highly classified, no comparable was previously known in human history, and BRMT operation leaves no trace evidence as it is a series of carefully focused energy pulses absorbed into the brain. This momentary sense of extreme rage which was most probably experienced by the knife wielder is comparable to the momentary biochemical rage induced in Lead Plaintiff during an unrecorded incident adjacent to Lead Plaintiff's residence between August 2008 and October 2010 in Cliffside Park, NJ and by the illegal BRMT bioweapon in the Tunnel Flash Incident documented at paragraph 619 HEXP-16, LPEE pages 11668. The intent of defendant UNITED STATES in orchestrating this process against US persons would have been and would be to

facilitate its future deployment against others which it targets for assassination (paragraphs 803, 805).

C. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	10, 608, 609, 619 HEXP-5, 6,16; 626, 629, 630 RGTS-6, 9, 10; 639 RICO-1; 694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	1-001A
LPEE Table 2 pages 12023-12120 paragraphs:	2-0026
LPEE pages (see technical note on page numbering at paragraph 230):	1 et al, 11-139, 140 et al, 413-415, 416-418,419-426, 542-547, 564-574, 598-606, 766-769, 772-773, 774-785, 786-793, 9679-9696, 9875, 10187-10250, 10302-10304, 11656-11664, 11668, LPEEV65-1

Emails and documents by topic and date, also located in LPEE:	Not applicable
---	----------------

D. These schemes and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to these Lethality Attempts series subcounts at paragraphs 697 through 710 follow:

Interline Exhibits:	15, 15C, 15D
Complaint paragraphs:	10, 462-469, 471-473, 499-500, 502-503, 511-512, 516-521, 527B; 600, 602, 603 NSEC-1, 3, 4; 604-609, 611, 614, 615, 616, 617-620 HEXP-1-6, 8, 11, 12, 13, 14-17; 626, 629-636 RGTS-6, 9-16; 639, 641, 642 RICO-1, 3, 4; 695, 699-701, 703, 705, 706-710 LETHL-2, 6-8, 10, 12, 13-17
Appendix 2 paragraphs:	1-001A, 1-001C, 1-001D, 1-001E, 1-032, 1-056, 1-058, 1-059, 1-064, 1-065, 1-066, 1-067

LPEE Table 2 pages 12023-12120 paragraphs:	2-0026, 2-0076, 2-0099, 2-0115, 2-0117, 2-0150, 2-0158, 2-0188, 2-0193, 2-0194. 2-0196, 2-0202, 2-0203 through 2-0215, 2-0217
LPEE pages (see technical note on page numbering at paragraph 230):	1 et al, 140 et al, 413-415, 416-418, 419-426, 542-547, 564-574, 598-606, 766-769, 772-773, 774-785, 786-793; 794, 1074V (10/31/2017 entry), 9679-9696, 9875, 10187-10250, 10302-10304, 10306-10310, 10614-10619, 10620, 10631, 10637, 10639, 10653, 11656-11664, 10672, 10694-10736, 10737-10738, 10739-10744, 10745-10747, 10748-10749, 11668, 12160-12244, LPEEV65-1, 2, 13-16
Emails and documents by topic and date, also located in LPEE:	Certain emails are currently blocked by a defendant UNITED STATES computer hack

695. *LETHL-2 Lethality Attempts: Washington State BRMT Induced Falls, 1990-2005*

A. While a resident of the state of Washington, Lead Plaintiff was subject, between approximately 1990 and 2005, to a series of unexplained falls which were caused and created by defendant UNITED STATES or its agents, including at his 149th Street, Kirkland, WA residence across the street from the BURNS residence, during and after BURNS residency there. These losses of balance and equilibrium falls caused the Lead Plaintiff to tip backwards while remaining in a completely erect posture, tipping him as if a statue, and created serious risks of severe injury or death. These falls were initiated while the Lead Plaintiff was hiking alone near Stevens Pass, climbing a ladder to the roof of his home in Kirkland, standing on living room scaffolding during construction, and under other circumstances not currently recalled. The evidence as to the specific date, time, and remote BRMT instructions which are given to initiate each event are likely to be available upon discovery against defendant UNITED STATES.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT

development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	615, 617 HEXP-12, 14; 694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	1-001C
LPEE Table 2 pages 12023-12120 paragraphs:	2-0076
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 419-426, 774-785
Emails and documents by topic and date, also located in LPEE:	Certain emails are currently blocked by a defendant UNITED STATES computer hack

696. LETHL-3 Lethality Attempts: Washington State BRMT Induced Suicide Ideation, 2003-2005

A. In the aftermath of the precursor and successor events related to the 9/11/2001 terrorist attack, and as defendant REICHERT moved from Sheriff at defendant KCSD to Congress, defendants DOJ, FBI, CIA, ARMY, ROSENBERG, FAUCI, and unknown others maneuvered systematically and decisively to destroy Lead Plaintiff's fraudulently orchestrated

and managed marriage to Jeanette and all potential sources of personal income. While a resident of King County, Washington, Lead Plaintiff was subject between approximately 2002 and 2005 to intense, torturous BRMT manipulation of brain biochemistry, and to on-going coercive psychological abuse by visual and electronic means, which defendant UNITED STATES, DOJ, FBI, CIA, ARMY, FAUCI, NIAID, ROSENBERG, CALDWELL, PRAY, MUELLER, and unknown others, used to drive Lead Plaintiff through biochemical torture and clinical depression to suicide ideation (paragraphs 462-469, 499-500, 511-512, 516-517, 520, 602 NSEC-3). This sequence of high stress events and manipulations induced severe brain biochemical imbalances, caused and created by defendant UNITED STATES and/or may directly involve other defendants and their respective agents. This created a very high risk of severe injury or death. The evidence as to the specific date range and sequence of the remotely commanded BRMT instructions which drive this sequence are available during discovery against these defendants.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical

confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	462-469, 499-500, 511-512, 516-517, 520, 602 NSEC-3; 694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	1-032
LPEE Table 2 pages 12023-12120 paragraphs:	2-0115, 2-0117
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 419-426, 598-606, 774-785, 9679-9696
Emails and documents by topic and date, also located in LPEE:	Not applicable

697. *LETHL-4 Lethality Attempts: Inciting Public Vigilantism, 2004-2024*

A. Defendants with police powers hacked and manipulated Lead Plaintiff's personal computer to make his actions, plans, and movements a matter of public viewing sometime after he joined CNA Industrial Engineering in 1996. This led to and inspired violent acts against third parties, ranging from commercial enterprises to individuals (paragraph 602 NSEC-3).

Defendants used the illegal BRMT bioweapon and bioweapon delivery system, tradecraft signaling, and direct action against third parties to create and sustain a public mythology about Lead Plaintiff, which directly endangered his life, well-being, personal prospects, employment, and entrepreneurial activities to further their illegal scheme as they employed public vigilantism, along with their direct acts against Lead Plaintiff, and harmed third parties to create and sustain the propagandistic mythology about the Lead Plaintiff while engaged in this corrupt process.

B. These direct acts ranged from mass casualty attempts to individual acts against innocent third parties with lethal and potentially lethal outcomes (paragraphs 706-710 LETHL-13-17). This fraudulent scheme, running into recent years, primarily has and does (i) use the illegal BRMT bioweapon and bioweapon delivery system to control certain of Lead Plaintiff's movements, public and private activities, words, expressions, and brain biochemistry (paragraphs 616 HEXP-13); induces on-going brain biochemical depression and induces suicidal ideations at times (paragraphs 604-607 HEXP-1-4); (ii) use wire frauds and email frauds to control Lead Plaintiff's digital and online environment (paragraphs 629, 630, 631, 635, 636 RGTS-9-11, 15, 16) (iii) to make his actions and reactions to the defendants' on-gong harassments public; (paragraphs 617-619 HEXP-14-16; 629, 630, 632 RGTS- 9, 10, 12) and (iv) systematically disrupts Lead Plaintiff's private and commercial actions including, without limitation, in its affects on interstate commerce (paragraphs 600-710, all subcounts in all series generally).

C. Defendants' overriding purposes has been and is, without limitation, to sustain and perpetuate the defendant UNITED STATES' ability to sustain its illegal and unconstitutional control Lead Plaintiff, and his moment-to-moment environment, actions, reactions across many years, perpetuate Lead Plaintiff's involuntary servitude, forced labor, all in violation of the *First, Third, Fourth, Fifth, Eighth, Ninth, Thirteenth, and Fourteenth* Amendments, and other civil, Constitutional, and human rights; to subject him to public sensationalism, greatly enhance the risk of direct violence and vigilantism against Lead Plaintiff; and create the circumstances for public harassment of Lead Plaintiff creating risks and circumstances which they could not legally conduct directly, and which could not otherwise occur in or to the Lead Plaintiff. These acts have been and are intended to discredit, damage, or harm the health and well-being of the

Lead Plaintiff through all feasible means, be it entrapment, intimidation, an act of lethal public vigilantism, or a natural appearing lethal sequence or event.

D. Defendant UNITED STATES most probably employed this method of extreme illegal BRMT bioweapon and bioweapon delivery system biochemical, physical, and sexual abuses to orchestrate the murder of Audrey Brewer in September 2011 (paragraph 10) using an physically and emotionally abused female intermediary as the direct perpetrator while acting in apparent extreme rage under the direct influence of the illegal BRMT bioweapon system used to biochemically hijack her pineal gland to surge adrenaline and thereby provoke the knife slashing attack which resulted in Audrey Brewer's death from the slashing of her carotid artery in her neck. The female perpetrator had absolutely no history of violence at any time but was also being psychologically provoked by the manipulative male who was involved in relationships with both females at various times. The psychological abuse of the apparent perpetrator is used in the moment as the concealment which hides the actual BRMT perpetrator of the extreme biomedical hijacking from view and exposure, since BRMT is highly classified, not previously known in human history, and leaves no trace evidence as it is a series of carefully focused energy pulses absorbed into the brain which leaves no trace evidence behind. This momentary sense of extreme rage which was most probably experienced by the knife wielder is comparable to the momentary biochemical rage induced in Lead Plaintiff by the illegal BRMT bioweapon in during an unrecorded incident adjacent to Lead Plaintiff's residence between August 2008 and October 2010 in Cliffside Park, NJ and the Tunnel Flash Incident documented at paragraph 619 HEXP-16, LPEE pages 11668. The intent of defendant UNITED STATES in orchestrating this process against US persons would have been and would be to facilitate its future deployment against others which it targets for assassination.

E. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	10, 602 NSEC-3; 619 HEXP-16; 694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	Not applicable
LPEE pages (see technical note on page numbering at paragraph 230):	1 et al, 140 et al, 419-426, 774-785, 9679-9696, 11668, LPEEV65-1
Emails and documents by topic and date, also located in LPEE:	Not applicable

698. *LETHL-5 Lethality Attempts: New Jersey BRMT Induced Suicide Ideation, 2008-2010*

A. While a resident of the state of New Jersey, Lead Plaintiff was subject between approximately August 2008 and June 2010 to extreme BRMT hijacking of brain biochemistry and psychological abuse which defendants used to drive Lead Plaintiff to a suicide ideation (paragraph 631B RGTS-11). This sequence of high stress events and hijacking to create an extreme brain biochemical imbalance was caused and created by defendant UNITED STATES and/or may have directly involved other defendants and their respective agents (paragraphs 462-466, 471-473, 502-503, 512, 516-521, 527B; 600, 602, 603 NSEC-1, 3, 4; 606, 611, 614, 615, 617, 620 HEXP-3, 8, 11, 12, 14, 17; 629-634 RGTS-9-14; 641, 642 RICO-3, 4). This created a very high risk of severe injury or death. The evidence as to the specific date range and sequence of these remote BRMT instructions given to sustain the event are available upon discovery against defendant UNITED STATES and other police powers defendants including, without limitation, defendants NJTPD, PAPD, NYPD, NJSP, BERGEN SHERIFF, BERGEN, as well as corporate, press, and individual defendants herein.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets

privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953).

Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	462-466, 471-473, 502-503, 512, 516-521, 527B; 600, 602, 603 NSEC-1, 3, 4; 606, 611, 614, 615, 617, 620 HEXP-3, 8, 11,12, 14, 17; 629-634 RGTS-9-14; 641, 642 RICO-3, 4; 694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	1-032
LPEE Table 2 pages 12023-12120 paragraphs:	2-0150
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 419-426, 598-606, 774-785, 9679-9696
Emails and documents by topic and date, also located in LPEE:	Not applicable

699. LETHL-6 Lethality Attempts: New Jersey Cliffside Park BRMT Falls, 2008-2010

A. While a resident of the state of New Jersey, Lead Plaintiff was subject between approximately 2008 and 2010 to a series of unexplained falls which were caused and created by defendant UNITED STATES, CIA, ARMY in its illegal and potentially lethal deployment of the illegal BRMT bioweapon and bioweapon delivery system. These falls caused the Lead Plaintiff to tip backwards while remaining in a completely erect posture, tipping him as if a statue, and created a risk of severe injury or death. One of these falls was triggered while the Lead Plaintiff was walking alone at the northwest corner of Thompson Lane and River Road. The back of the Lead Plaintiff's head struck the sidewalk, missing the base of a streetlight and a broken neck by

approximately 24 inches. The evidence as to the specific dates, times, and remote BRMT instructions which were given to initiate each event are likely to be available upon further investigation and discovery against defendants. Related comparable illegal BRMT induced hazardous events are shown at paragraph 615 617-619 HEXP-12, 14-16; 695, 700, 701, 703, 705, 706, 708 LETHL-2, 7, 8, 10, 12, 13, 15.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	615 617-619 HEXP-12, 14-16; 695, 700, 701, 703, 705, 706, 708 LETHL-2, 7, 8, 10, 12, 13, 15; 694-710 LETHL-1-17 generally

Appendix 2 paragraphs:	1-001C
LPEE Table 2 pages 12023-12120 paragraphs:	2-0076, 2-0158
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 419-426, 774-785
Emails and documents by topic and date, also located in LPEE:	Not applicable

700. *LETHL-7 Lethality Attempts: BRMT Staircase Falls and Attempts in New Jersey and New York 2008-2022*

A. While a resident of the state of New Jersey, Lead Plaintiff was subject from approximately 2008 to the present to a series of near falls in New Jersey and New York on staircases inside, for example, the Metropolitan Museum of Art ground floor entrance near the southeastern corner of the main building; at various times on stairs in his Edgewater, NJ residential building; in the building housing the third floor New School theater space, Museum of the City of New York, Port Authority Bus Terminal South Building, and numerous other locations. Defendant UNITED STATES, CIA, ARMY deliberately has and does use the illegal BRMT bioweapon and bioweapon delivery system to mislocate the placement of the foot on the stair, either by hitting the heel, or by misplacing the foot on the stair tread behind the toes, causing a fall. These loss of balance disturbances have been and are easily created with the illegal BRMT bioweapon and bioweapon delivery system. At other times, the illegal BRMT bioweapon and bioweapon delivery system is used to keep the head upright and eyes looking forward, instead of down toward the stair tread as needed for safe descent; by momentary interruption of central nervous system muscle control which drops the descending foot too early causing a trip; and/or by momentary loss of consciousness which causes a complete loss of positional awareness. Each and every such loss of balance event creates a risk of severe injury or death. The evidence as to the specific date, time, and remote BRMT instructions given to initiate

each event are available upon discovery against defendant UNITED STATES , CIA, ARMY and the co-conspirators participating in the set-up and conduct of each specific event. Related comparable illegal BRMT induced hazardous events are shown at paragraph 615 617-619 HEXP-12, 14-16; 695, 699, 701, 703, 705, 706, 708 LETHL-2, 6, 8, 10, 12, 13, 15.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	615 617-619 HEXP-12, 14-16; 695, 699, 701, 703, 705, 706, 708 LETHL-2, 6, 8, 10, 12, 13, 15; 694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	1-001D

LPEE Table 2 pages 12023-12120 paragraphs:	2-0076, 2-0158, 2-0194
LPEE pages (see technical note on page numbering at paragraph 230):	1 et al, 11-139, 140 et al, 419-426, 564-574, and 786-793
Emails and documents by topic and date, also located in LPEE:	Not applicable

701. LETHL-8 Lethality Attempts: New Jersey Hackensack BRMT Fall, 2017

A. While a resident of the state of New Jersey, Lead Plaintiff was subject in approximately 2017 to an illegal BRMT bioweapon and bioweapon delivery system induced fall in a County of Bergen, NJ (BERGEN COUNTY) office building while leaving a housing interview appointment. This fall was caused and created by defendant UNITED STATES purposefully locking the Lead Plaintiff's eyes to the horizon rather than focusing on the stair he was descending at that moment, causing Lead Plaintiff to trip and fall forward. Lead Plaintiff's heel struck the edge of the stair tread, and he stumbled to one knee, abrading and injuring that knee. This event created a risk of severe injury or death. The evidence as to the specific date, time, and remote BRMT instructions given to trigger the event are available upon discovery against defendants. Related comparable illegal BRMT induced hazardous events are shown at paragraph 615 617-619 HEXP-12, 14-16; 695, 699, 700, 703, 705, 706, 708 LETHL-2, 6, 7, 10, 12, 13, 15.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and

rackeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953).

Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	615 617-619 HEXP-12, 14-16; 695, 699, 700, 703, 705, 706, 708 LETHL-2, 6, 7, 10, 12, 13, 15; 694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	1-001C
LPEE Table 2 pages 12023-12120 paragraphs:	2-0076, 2-0158
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 419-426, 774-785
Emails and documents by topic and date, also located in LPEE:	Not applicable

702. LETHL-9 Lethality Attempts: California BRMT Induced Extreme Eye Watering, 2017

A. While traveling for business between Pico Rivera, CA and Los Angeles International Airport on October 31, 2017, defendant UNITED STATES, CIA , ARMY, produced extreme eye irritation and watering of Lead Plaintiff eyes while he was driving west on the I-105 freeway near Lynnwood, CA, traveling approximately 65 to 70 miles per hour. This created a substantial risk of loss of vehicle control and collision with another vehicle or obstacle,

and the resultant severe risk of injury or death to himself and to members of the public. This was not an allergic reaction to any airborne substance. Lead Plaintiff previously spent years in this part of California under the same conditions and had driven this same freeway through this same area eastbound without incident about 3-4 hours earlier while traveling toward his meeting in Pico Rivera, CA.

B. Lead Plaintiff has subsequently experienced these symptoms periodically while using over-the-counter eye drops at home, likely due to a deliberate illegal BRMT bioweapon and bioweapon delivery system induced manipulation of the pH level of the eyes. These symptoms also correlate with extreme headaches and blurry vision induced on occasion during 2021 and 2022. Those extreme headache and blurry vision symptoms had also been experienced for months on end in Boston, MA in 2006-2007 and in Cliffside Park, NJ, in 2008-2010, where they occurred in both locations at the same morning hour each day. These symptoms abruptly appeared for a long sequence of daily headaches and vision issues, then abruptly disappeared with no medical reason for any of these repetitive abrupt changes in pattern. A neurological examination in Boston, MA, and two brain scans in New Jersey have provided no plausible medical explanation for these symptoms or for their long-duration irregular recurrences. Illegal triggering through BRMT bioweapon and bioweapon delivery system abuse is the sole remaining plausible explanation for this pattern, which correlates with the medically bizarre reversal of presbyopia with aging described at paragraphs 602F, 617G, H.

C. The evidence as to the specific date, time, and remote BRMT instructions given to initiate the event are available upon discovery against defendant UNITED STATES, CIA, ARMY. Similar illegal BRMT induced events include, without limitation, those related at

paragraphs 615 617-619 HEXP-12, 14-16; 695, 699-701, 705, 706, 708 LETHL-2, 6-8, 12, 13, 15.

D. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	615 617-619 HEXP-12, 14-16; 695, 699-701, 705, 706, 708 LETHL-2, 6-8, 12, 13, 15; 694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	Not applicable
LPEE pages (see technical note on page numbering at paragraph 230):	1 et al, 140 et al, 419-426, 774-785, 1074V (10/31/2017 entry), 10306-10310

Emails and documents by topic and date, also located in LPEE:	Not applicable
---	----------------

703. *LETHL-10 Lethality Attempts: New Jersey Edgewater Bedroom BRMT Falls, 2019*

A. On two instances in 2019, Lead Plaintiff was rolled out of bed like a log and struck the floor. These falls were initiated while the Lead Plaintiff was sleeping alone in his residence in Edgewater, NJ. These falls were caused and created by defendant UNITED STATES or its agents using the illegal BRMT bioweapon and bioweapon delivery system. One of these falls caused a visible head injury to the right side of his forehead as the head struck a nightstand as the rest of the body continued falling to the floor, which torqued the neck and spinal cord. This injury left an obvious scar on his forehead which was noted several months later, and again over a year later, by medical professionals during routine head examinations at dental hygiene appointments at the Bergen Community College Dental Hygiene Clinic. Medical records which recorded these notations have been requested under HIPAA. These falls created risks of severe injury or even death as a result of the head strike while the body continued to fall to the floor, potentially fatally torquing the neck and spinal cord. The evidence as to the specific dates, times, and remote BRMT instructions given to initiate these falls are available upon discovery against defendants. Similar illegal BRMT induced events include, without limitation, those related at paragraphs 615 617-619 HEXP-12, 14-16; 695, 699-701, 705, 706, 708 LETHL-2, 6-8, 12, 13, 15.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT

development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	615 617-619 HEXP-12, 14-16; 695, 699-701, 703, 705, 706, 708 LETHL-2, 6-8, 10, 12, 13, 15; 694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	1-001C
LPEE Table 2 pages 12023-12120 paragraphs:	2-0076
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 419-426, 774-785
Emails and documents by topic and date, also located in LPEE:	Not applicable

704. LETHL-11 Lethality Attempts: Website Hacks to Eliminate or Delay Covid Vaccination, 2020

A. On 149 occasions from late January to March 24, 2021, defendant UNITED STATES, CIA, ARMY hacked or spoofed Lead Plaintiff's access to www.bergencountycovidvaccine.com so an appointment could not be made to receive the

Covid-19 vaccine he was eligible for as a 65 year old, creating additional risks of hospitalization, severe injury, or death. On occasion, he navigated through the identification and qualifications phases to the appointment setting step before being denied an appointment during that step while he was attempting to set the specific time for the specific appointment, at other times he was informed at that screen that there were no appointments available. He emailed with the BERGEN COUNTY Executive's office about these issues over an extended conversation, and also emailed Bergen County Council members about the matter but received no response from any of the Council member (likely due to email blocking by defendants, who likely also spoofed both this only available Covid-19 vaccination site at that time and any relevant email responses intended to be received by Lead Plaintiff). See paragraph 631 RGTS-11.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant

content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	631 RGTS-11; 694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-12120 paragraphs:	2-0188
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 419-426, 794, 9875, 10187-10250
Emails and documents by topic and date, also located in LPEE:	Currently blocked by defendant UNITED STATES computer hack

705. *LETHL-12 Lethality Attempts: New Jersey Edgewater BRMT Falls, 2021 to present*

A. While a resident of the state of New Jersey, Lead Plaintiff was subject between approximately December 2021 and August 2022 to unexplained tripping and falling events. These events were caused and created by defendant UNITED STATES, CIA, ARMY using the illegal BRMT bioweapon and bioweapon delivery system to cause momentary blackouts, and/or contract or relax muscles of Lead Plaintiff, leading to a loss of control and balance. These events caused the Lead Plaintiff to trip and very nearly fall near the southwest corner of the Edgewater Commons south access road at River Road, and at another time, while crossing River Road near Penny Lane, both in Edgewater, NJ. Failure to quickly regain his balance by stumbling forward to an upright posture could have ended with the Lead Plaintiff falling onto this heavily traveled street. Such an outcome could have caused severe injury or death in traffic. Evidence as to the specific date, time, and remote BRMT instructions given to initiate each event are available upon discovery against defendants. Similar illegal BRMT induced events include, without

limitation, those related at paragraphs 615 617-619 HEXP-12, 14-16; 695, 699-701, 706, 708 LETHL-2, 6-8, 13, 15.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	615 617-619 HEXP-12, 14-16; 695, 699-701, 703, 706, 708 LETHL-2, 6-8, 10, 13, 15; 694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	1-001D
LPEE Table 2 pages 12023-12120 paragraphs:	2-0196, 2-0202
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 419-426, 774-785, 11665-11666

706. LETHL-13 Lethality Attempts: North Bergen Hospital Fall, 2021

A. While a resident of the state of New Jersey, Lead Plaintiff was subject in April 2021 to an illegal BRMT bioweapon and bioweapon delivery system induced fall in Palisades Medical Center, North Bergen, NJ. This fall caused the Lead Plaintiff to tip to the right while remaining completely rigid, tipping him as if a statue. His head narrowly missed striking the vulnerable skull opening of the right temple on a 4 inch tall metal base of a rolling bed table at floor level. This fall was caused and created by defendant UNITED STATES, CIA, ARMY use of the illegal BRMT bioweapon and bioweapon delivery system to create a risk of severe injury or death. The evidence as to the specific date, time, and remote BRMT instructions which were given to initiate the event are available upon discovery against defendants. Medical evidence which documents this event and the follow-on medical tests required before a doctor would release the Lead Plaintiff from the hospital have been requested from SCIARRA, the attending physician, and Palisades Medical Center, North Bergen, NJ, as has the identity of the medical doctor who attended the Lead Plaintiff and ordered an MRI immediately after the fall, and who also noted an alleged irregular heartbeat and made a referral to ASTUDILLO for cardiology follow-up (see 710 LETHL-17). SCIARRA has stated in an email to Lead Plaintiff that there are no such records as his medical practice entity in New Jersey is defunct. This incident is subject to further discovery, noting that SCIARRA abruptly abandoned his decades-long northern New Jersey medical practice soon after this incident. Similar illegal BRMT induced events include, without limitation, those related at paragraphs 615 617-619 HEXP-12, 14-16; 695, 699-701, 705, 708 LETHL-2, 6-8, 12, 15.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	615 617-619 HEXP-12, 14-16; 695, 699-701, 703, 705, 708 LETHL-2, 6-8, 10, 12, 15; 694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	1-001E, 1-039
LPEE Table 2 pages 12023-12120 paragraphs:	2-0193, 2-0194
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 419-426, 774-785
Emails and documents by topic and date, also located in LPEE:	Not applicable

707. LETHL-14 Lethality Attempts: New York Metro North Mass Casualty Attempt, 2022

A. While a resident of the state of New Jersey, Lead Plaintiff boarded a Metro North Hudson Line express train from Beacon, New York to Grand Central Terminal in New York City on Sunday evening, September 11, 2022. The express train was traveling south at approximately 50 to 60 miles per hour when the engineer urgently braked the train to an emergency stop as the train collided with a tree which had fallen or been fallen to block at least three of the four railroad tracks at that point, including the southbound express track the train was traveling on at the time.

B. This incident occurred within 2 to 3 minutes after sundown, just after the sun had set to the south, directly impacting engineer's adjustment from bright daylight with sun setting on the horizon almost directly ahead to night vision. The location of the tree strike was carefully selected by those who planned the strike for this moment right after sunset as the train engineer's eyes would take several minutes to adjust to night vision from the bright sunlight of the setting sun directly in his eyes to the moonless darkness of that night. The location was a relatively remote track section with no nearby structures or inhabitants, so there were no ambient light sources in the area. If the tree had been larger, the train would have contacted a more substantial portion of the trunk of the tree, and with the tree's full weight and its root ball still wedged in the ground, it could have exerted enough lateral force to derail the train at its relatively high speed. This created a very significant risk of injury or death to the Lead Plaintiff and several hundred other passengers while the train operated about 20 feet from edge of the embankment on the Hudson River. Similar illegal mass casualty events include, without limitation, those related at paragraphs 602 NSEC-3.

C. There was a specific sequence of further follow-on events, reportedly including a stalled train, which then resulted in the Lead Plaintiff's exit from that MTA Hudson Line express train at Yankee Stadium, one stop short of his destination, where he walked to the MTA 4 line subway train to complete his travel to Grand Central Terminal in New York City. This sequence included noted signature tradecraft events, details available from defendants upon discovery, indicating the detail's knowledge and pre-planning of this sequence by defendants under command authority of defendants with police powers which would have occurred well in advance of his arrival at the Yankee Stadium station where he walked to the 4 line subway train, all of which is indicative of pre-planning far in advance of the Yankee Station transfer. Evidence of the specific defendants who conspired and/or caused this event sequence is available upon discovery.

D. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among

some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	15, Appendix paragraph 1-056
Complaint paragraphs:	602 NSEC-3; 694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	1-056
LPEE Table 2 pages 12023-12120 paragraphs:	2-0099, 2-0202
LPEE pages (see technical note on page numbering at paragraph 230):	413-415, 416-418, 542-547, 564-574, 598-606, 766-769, 772-773, LPEEV65-11
Emails and documents by topic and date, also located in LPEE:	Not applicable

708. LETHL-15 Lethality Attempts: New York Morningside Park BRMT Fall, 2022

A. While a resident of the state of New Jersey, Lead Plaintiff was subject on September 17, 2022 at 7:29PM to a fall from the top step of a deliberately darkened staircase in a series of park pathway stairs spread over 250 feet in the southwest corner of Morningside Park, a New York City Park (defendant NYC) which was caused and created by defendant UNITED STATES, CIA, ARMY acting in coordination with individuals employed by defendants NYC and/or NYPD. This illegal BRMT bioweapon and bioweapon delivery system induced fall caused the Lead Plaintiff to misplace his left foot on the top stair, lose his balance, and do a complete forward somersault on the stairs, landing on his back on the set of stairs, injuring his head, knees, and hands (Interline Exhibit 15C). This fall created a specific risk of severe injury or death. Further evidence corroborating the specific date, time, and remote BRMT instructions given to initiate this event are available upon discovery against defendants. Similar illegal

BRMT induced events include, without limitation, those related at paragraphs 615, 617-619
HEXP-12, 14-16; 695, 699-701, 705, 706 LETHL-2, 6-8, 12, 13.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	15C
Complaint paragraphs:	615 617-619 HEXP-12, 14-16; 695, 699-701, 705, 706, LETHL-2, 6-8, 12, 13; 694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	1-058, 1-059
LPEE Table 2 pages 12023-12120 paragraphs:	2-0076, 2-0099, 2-0202, 2-0203
LPEE pages (see technical note on page numbering at paragraph 230):	140 et al, 419-426, 542-547, 564-574, 786-793, 10302-10304, LPEEV65-11

Emails and documents by topic and date, also located in LPEE:	Not applicable
---	----------------

709. LETHL-16 Lethality Attempts: New Jersey North Bergen Vehicle Rundown. 2022

A. A vehicle rundown sequence, intended to harm and/or intimidate the Lead Plaintiff was conducted in New York City and North Bergen, NY on November 18 and 19, 2022. Two streets being crossed by Lead Plaintiff in New York City had their streetlights extinguished in both directions from Eighth Avenue (Interline Exhibit 15D) and electric scooters ran in the opposite travel direction from normal traffic on these one-way streets after dark. No other vehicle traffic was on either street at this time. About 90-110 minutes later, normal vehicle traffic in the proper direction was allowed on these streets as the Lead Plaintiff returned to the same subway station from a performance event. The following night the illegal BRMT bioweapon and bioweapon delivery system was used as his attention was distracted toward a bright light and his left peripheral vision was limited by his rightward diagonal angle of travel across a parking lot travel aisle. While his walking pace was fixed by the illegal BRMT bioweapon and bioweapon delivery, a white compact car in the left distance traveling slowly south in the traffic aisle was rapidly accelerated and raced toward him in the parking lot of the North Bergen, NJ WALMART, whereupon it was panic slowed very abruptly within 15 feet of the Lead Plaintiff, and coming to a final stop about 5 feet away just after it had entered his peripheral vision. As he visited a restroom in the Wendy's restaurant after a meal there, a male appeared to vomit into the restroom sink. There was no injury from this event sequence, but this pattern of practice was and is completely consistent with other coordinated illegal BRMT bioweapon and bioweapon delivery system, and related physical violence and intimidation attempts directed at the Lead Plaintiff, as further described in these subcounts and narrative.

These close pass and near miss incidents, with high speed electric scooter, electric bike, pop-out cars, cross-town buses, and single axle commercial trucks (police powers cover vehicles) have been particularly pervasive in NYC.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follows:

Interline Exhibits:	15D
Complaint paragraphs:	694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	1-064, 1-065, 1-066
LPEE Table 2 pages 12023-12120 paragraphs:	2-0099, 2-0203 through 2-0215
LPEE pages (see technical note on page numbering at paragraph 230):	LPEEV65-11

Emails and documents by topic and date, also located in LPEE:	Not applicable
---	----------------

710. LETHL-17 Lethality Attempts: Programmed Health Collapse, 2023

A. During 2023 into early 2024, Lead Plaintiff observed defendants' direct attempts to construct a programmed health collapse narrative using health professionals assigned to Lead Plaintiff through the health care plan, Braven, which was used by defendants as part of their on-going illegal involuntary servitude and other acts, violations, and injuries to Lead Plaintiff. Two primary sequences have been used to construct this narrative:

- (i) on-going obstructions of the colon which have presented in a medically very unlikely sequence, paragraph 710 LETHL-17
- (ii) a cardio/heart health sequence which appeared without any prior history at the time of the fall related in paragraph 706 LETHL-13.

B. Lead Plaintiff began experiencing constipation in irregular cycles around 1984. Periodically throughout and after these progressions, Lead Plaintiff's constipation completely disappeared, then recurred in bouts. This illegal BRMT bioweapon and bioweapon delivery system abuse form of pattern, their abrupt appearances, disappearances, and recurrence of patterns, matches other such anomalous health patterns of reversing presbyopia and extreme headaches cycles, as noted at paragraph 702B. While others also naturally experience this issue, it is notable as illegal BRMT bioweapon and bioweapon delivery system hijackings of brain biochemistry, per paragraph A(i) above, and is potentially lethal, given the bizarre and aggressive form this illegal BRMT hijacking has taken on in 2023-24.

C. This specific 2023-24 colon blocking sequence is evidenced by a series of Lead Plaintiff diary entries which identify a specific sequence of highly medically improbable

occurrences including the progressive cyclic failures of a series of normal medical interventions including fiber supplements, polypropylene glycol, and lactulose. Further, the lag period between each of those medical interventions and the normal period in which they act upon the body, compared to the direct experience of the Lead Plaintiff, does not consistently match their normal efficacy and lag time patterns. This can only plausibly be explained as an external intervention using the illegal BRMT bioweapon and bioweapon delivery system, a biomedical abuse tool available only to defendant UNITED STATES, CIA, ARMY. When explained to Lead Plaintiff's primary physician PATEL, actually an employee of defendant UNITED STATES, the physician recommended contacting a gastroenterologist, suggested one might be joining his local practice at some point in the near future, then simply walked away, suggesting a return visit in three months. Upon attempting to contact the gastroenterologist SCIARRA, whose office had completed the colon examination described at paragraph 706 LETHL-13, the phone company message indicated the office phone line had been temporarily disconnected and the gastroenterologist's direct personal cell phone was not accepting calls. As a result of this follow-up, Lead Plaintiff discovered that SCIARRA, who had a longtime northern New Jersey gastroenterological medical practice, had abruptly relocated to Beaufort, North Carolina in the months after Lead Plaintiff's hospital fall at paragraph 706 LETHL-13. See LPEE pages 11656-11664, 12234-12244, LPEEV65-2, 13-16.

D. The heart health narrative sequence is evidenced by ASTUDILLO, a cardiologist who was introduced to Lead Plaintiff immediately after the North Bergen hospital fall at Palisades Medical Center in 2021, paragraph 706 LETHL-13, reviewed a routine EKG in 2022 and said there was no imminent danger and that routine follow-up was adequate, then reviewed another routine EKG in 2023 which looked identical to the 2022 EKG to Lead Plaintiff, and

surprisingly recommended an extensive series of tests, including a wearable round the clock heart monitor and a hospital based heart test. See LPEE pages 12160-12233.

E. During a prior visit to this cardiologist's office, a pulse monitor had indicated the Lead Plaintiff heart rate was 38 beats per minute, at a time when the actual reading was well within normal range of about 65 to 74 beats per minute based upon the Lead Plaintiff's own physical body reactions at that time. Depending upon the actual software code in the EEPROM (electrically erasable programmable read only memory) of the wearable heart monitoring device, the monitoring device itself could be manipulated to suit a specific cardio health narrative intended by defendant UNITED STATES, CIA, ARMY simply by hacking the software to record a different pattern to the device's memory than is actually being experienced by the wearer of the monitor. This allows the third party intervenor (perhaps a nefarious defendant UNITED STATES, CIA, ARMY) to construct an alternative health narrative about the patient, so that the patient can be orchestrated into an apparently natural adverse life outcome using the illegal BRMT bioweapon and bioweapon delivery system to manufacture a specific intervention, such as a fatal heart attack. The illegal BRMT bioweapon and bioweapon delivery system can and does control any bodily function selected by the perpetrator operator for modification or termination, as demonstrated by, among other things, the unnatural nature of the colon interventions described in subparagraph B above. Medical records and related medical tests will be produced from the attending physicians through the discovery process.

F. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT

development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	706 LETHL-13; 694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	1-067
LPEE Table 2 pages 12023-12120 paragraphs:	2-0217
LPEE pages (see technical note on page numbering at paragraph 230):	11656-11664, 12160-12233, 12234-12244, LPEEV65-2, 11, 13-16
Emails and documents by topic and date, also located in LPEE:	Not applicable

711. Paragraph 711 is reserved.

Key Illegal BRMT Program State And Local Government Co-Conspirators' Relationships To Federal Defendants

712. Defendant UNITED STATES, DOJ, FBI, USMS, DOD, CIA, ARMY, NIAID current and former senior executives both directly perpetrated and supervised illegal BRMT bioweapon and bioweapon delivery system field development test and deployment,

constitutional, civil and human rights violations, and racketeering acts, violations, and injuries, in conspiracy with state and local governments in various states where Lead Plaintiff and other plaintiffs have and do reside, work, worship and conduct other activities of normal life. There is a clear long-running pattern of an associated-in-fact racketeering enterprise in which these individual defendants have and do engage in this misconduct and pattern of racketeering acts and rights violations systematically not prosecuted by defendant DOJ since at least 1961 (paragraphs 1-37, 550-584).

713. From the 1960s into at least 1979, while Lead Plaintiff attended schools and colleges funded by defendant WASH, the illegal BRMT program manager BREYER, then operating from an assistant professor position at Harvard University, posed in Washington state as Snow, fraudulent church elder and apartment developer in Kent, WA at least between 1970-72, then as Jack Sackville-West, parent of Perham Hall Lead Plaintiff co-resident Bill Sackville-West, and as a Spokane architect, from at least 1974 until his supposed demise and memorial service in the 1990s shortly before his ascent to the US Supreme Court. This fraudulent memorial service at Spokane Presbyterian Church to bury the Jack Sackville-West legend in Spokane, WA, which fraudulent memorial service was attended by the unwitting Lead Plaintiff, who sat as part of the Sackville-West family, and by Admiral Stansfield Turner, former CIA Director under President Carter who had walked by the Lead Plaintiff as he visited the National Gallery of Art East Building rotunda in a cameo in Spring 1979, paragraph 424. On his return flight to Seattle, the unwitting Lead Plaintiff sat next to Admiral Turner using a first class upgrade offered and purchased by the former CIA Director.

714. While employed by defendants ARMY and CIA on the illegal BRMT bioweapon and bioweapon delivery program, defendant BREYER was in defendant ARMY Reserves from

1957-65, including six months active duty in Intelligence. BREYER then operated under cover as a Harvard Law School Assistant Professor from 1967-1980. This time period specifically coincides with the entirety of Lead Plaintiff's human trafficking during his education between 1967 and 1979, which incorporates, without limitation, (i) the initial known illegal human trafficking in 1968 to the California campground by Gary Jack for the illegal BRMT oxytocin hijacking of Lead Plaintiff's pineal gland, (ii) the 1970 Reye Syndrome aspirin/codeine murder of sister Sandra by embedded doctor KOHLER (paragraphs 99d, 417, 418, 714, 740, 803C-D, 805B(i), H, S, BS, 806B, 814B) whose improper prescription of aspirin and codeine was the cause of her death, (iii) the immediate subsequent 1970 fraudulent home church transfers to the homes of Elder Snow (BREYER) and to the Northeast Tacoma home churches of Lead Plaintiff's family of origin, (iv) the equilibrium disruptions and fall from a family Shetland pony to a head temple blow strike injury of Sandra's surviving twin Susan and, (v) in that same time period, KATYAL's comparable fall from a family horse breaking ribs during a riding lesson being given to KATYAL and to Grady by Lead Plaintiff, (vi) through multiple fraudulent and BRMT manipulated friendships and relationships in high school, and (vii) through other national security entanglements including, without limitation, at Green River Community College and defendant WSU. All these operations were directly supported and contributed to by various state and local governments and their employees, officers, and agents in Washington state, defendants FWSD, WASH, WSU, KCSD, as described below at paragraphs 716-781.

715. Defendant BREYER (ARMY Intelligence, CIA) also conspired with defendant WEISSMAN (FBI) during this period. Defendant WEISSMAN, while embedded at Associated Grocers, a Seattle, WA based grocery wholesaler to independent supermarkets, supervised the team which was fraudulently deployed into Larry's Markets (paragraph 418), Federal Way, WA,

which was co-owned by Larry Brewer, a cousin of Lead Plaintiff's father, during that surreptitious undercover FBI grocery store co-ownership and enterprise wrecking process which continued as Lead Plaintiff was employed there from 1972-1974. Defendant BREYER also conspired with FBI's Earl Keller, who was illegally embedded at Smith Brothers Dairy as Lead Plaintiff's father Don's minder from 1963, in the sequence of minders from at least 1961 and Pacific Paper Products, Tacoma, WA while he had worked in California from 1961-63, as the illegal BRMT bioweapon and bioweapon delivery system secret program managed the religious discrimination and other constitutional rights violations by defendant UNITED STATES, DOJ, FBI, CIA, ARMY against Lead Plaintiff's extended family enslaved in involuntary servitude to defendant UNITED STATES. Defendant BREYER also conspired with other unknown defendants against the Lead Plaintiff's uncle in Walla Walla, WA during this time period, upon his uncle's return from Fort Hood, Texas after service in defendant ARMY, all in furtherance of the illegal BRMT bioweapon and bioweapon delivery system program.

A. Defendant Federal Way School District

716. In 1969 or 1970, defendant Federal Way School District (FWSD) conspired with defendant UNITED STATES to organize a new high school, which according to defendant KATYAL (DOJ, fellow student Shawn Morrissey) was named Decatur based upon defendant KATYAL's lobbying of the FWSD Board Chair, with whom he represented he lived at the time. Decatur was formed prematurely as the school district grew, specifically to accommodate the illegal BRMT bioweapon program's further development cycle under defendant BREYER by its illegal human subject medical experiments on extended family members, including Lead Plaintiff, from about 1968 forward (paragraphs 2-7, 357-402, 604-619 HEXP-1-16), and on others in the small 80-90 student initial high school class. Defendant KATYAL attended with Thomas Grady, his DOJ/FBI working partner. In 1970-71, Decatur High School had a few

teachers and was housed in a small former district administration building adjacent to the existing Federal Way High School where all but a few classes were taught by Federal Way High School faculty. In Fall 1971, Decatur was moved to a new junior high school campus for the subsequent two years, at what later became Illahee Junior High School. A normal size high school class of around 200-300 was admitted at the Illahee site. The Decatur High School campus was completed and opened in Fall 1973, after the Lead Plaintiff's graduation in June 1973, held at Illahee.

717. The new sophomore class which entered in 1971 at the Illahee campus included Stuart Bettsworth (plausibly identified as GARLAND, paragraphs 5, 99m, 417-418, 845E(vii)), Frank Backman, also a junior, and his sister Mariam Backman, a sophomore, who allegedly had a romantic relationship with Bettsworth (GARLAND). Mariam Backman, presumably a false identity, may previously have been Karen Milholland in 1966-67 while posing as a sixth grade classmate at Lakeland Elementary School alongside classmate Martha (who was later Janet RENO, Attorney General from 1993-2001, as photo identified by Lead Plaintiff in April 2024). Miriam Backman (also plausibly Karen Milholland) also plausibly later reappeared as Karen Sackville-West (daughter of defendant BREYER as Jack Sackville-West) in Spokane in 1974-76, and as a Tacoma, WA area teacher working on her Masters Degree in Education in Summer 1978, (paragraphs 211, 417B, 467, 717, 762 table, 805AB, AC, AK) as introduced at WSU by Allene Sampson, while Lead Plaintiff attended graduate school for his MBA at defendant WSU. Sampson has been plausibly identified in April 2024 as Lisa Desjardins, now an employee of PBS News, the public media organization. Other members of defendant DOJ, FBI, ARMY, CIA, and other unknown federal agencies, who posed as students to perpetuate the illegal BRMT program and the involuntary servitude of the Lead Plaintiff and others, also attended through this

special accommodation granted to defendant UNITED STATES by defendant FWSD, as orchestrated by defendants KATYAL and BREYER, and unknown others. Decatur High School was overseen by school principal Dietrich, and by a vice principal name not recollected who directly fits the forensically identified defendant DOJ/FBI model agent profile of the time, and was taught by still other unknown defendant UNITED STATES and FWSD personnel who operated as educators during the years Lead Plaintiff attended until his June 1973 graduation.

B. WSU – Defendant Washington State University

718. Upon leaving Decatur and defendant FWSD, Lead Plaintiff attended Green River Community College (GRCC), which included defendant KCSD personnel and defendant UNITED STATES personnel, embedded as both students (Donna Dickover, David Brunton, others) and as faculty. Terry Buckles, employed by defendant WASH, who presented as a Washington Library Network employee in 1973-74 (and later as Wolfgang Opitz, on WA Governor Locke's staff when next met by the unwitting Lead Plaintiff in 1999, see paragraph 729 below), befriended and socialized with Lead Plaintiff. Lead Plaintiff continued to work at Larry's Market, where other defendant UNITED STATES personnel were embedded and which was secretly co-owned by defendant FBI (paragraph 418), all as part the comprehensive surrounding and surreptitious involuntary servitude and control of the Lead Plaintiff and his extended family by defendants' government, intelligence, and police powers personnel in the illegal BRMT bioweapon and bioweapon delivery system program managed by defendant BREYER.

719. Defendant WSU supported federal police powers operations and an initial surreptitious undergraduate introduction of the unwitting Lead Plaintiff to the Whitman County Sheriff office using a faked volunteer search and rescue squad, orchestrated classroom assignments of embedded federal agents as fellow undergraduate students and permitted

embedded defendant UNITED STATES personnel as teaching assistants to provide false feedback on inorganic chemistry lab results. Undergraduate years at Washington State University, Pullman, WA, included nearly continuous contacts with federal officers, agents, informants, university and state employees, who posed as roommates, friends, fellow employees, romantic interests, insurance agents, recreational program staff, and in other roles intended to provide defendant UNITED STATES' BRMT program management with continuous awareness and extremely powerful adverse influence over nearly all life choices. While a WSU undergraduate student, the Lead Plaintiff was still being handled in the field under a team headed by BRMT program executive Jack Sackville-West (BREYER), acting on behalf of defendants ARMY and CIA, who was later known as Stephen BREYER a federal appellate judge and Supreme Court Associate Justice.

720. Upon transferring from Green River Community College to Washington State University in Fall 1974, Lead Plaintiff was assigned to Perham Hall, a WSU student dormitory. Lead Plaintiff was unwittingly and unknowingly handled throughout college and graduate school by federal agents posing as fellow students and roommates beginning at Green River Community College, Auburn, Washington by Dickover and Brunton who transferred with Lead Plaintiff to Washington State University, Pullman, Washington in Fall 1974. During his first semester, his first assigned roommate Jay Costa was replaced by Andrew Ng, a British national from Hong Kong. Soon thereafter, the Resident Assistant who supervised the Perham residence hall floor for WSU was replaced by Michael CUNHA, introduced as an AFROTC member working toward medical school admission in psychiatry in the Air Force. In Perham Hall, he met and developed friendships and/or close personal relationships with defendants Craig PAGE, William (Bill) SACKVILLE-WEST, Bill's "father" Jack (defendant BREYER) and other Jack and Dorothy

SACKVILLE-WEST family members in Spokane, WA, Robert Mandich (GARLAND), CUNHA; as well as Linda Pogreba, Karen Raines, Susan Irish, Lynn Sorenson, Vic Jones, James Carberry, Tracy Berry, Katherine “Kit” Andrews, Bob Ross, among many others, as an undergraduate. This team included BREYER’s undercover “Jack and Dorothy family of wife and seven children,” with three remaining children – Bob, Bill, and Jim (the latter known today as Jack Smith – DOJ Special Counsel) who principally resided in the Spokane, WA area “family home” at 1424 South Maple Street, where Lead Plaintiff was a frequent weekend guest, having been befriended by William (Bill) Sackville-West who resided in WSU student dormitory Perham Hall on the same floor as Lead Plaintiff in 1974-75 and in Nez Perce Village thereafter, a few buildings east of Lead Plaintiff’s apartment, which he shared with NG and PAGE in 1975-76 and with PAGE in 1976-77.

721. Current Attorney General GARLAND has been forensically identified by Lead Plaintiff in late 2023 as the person known to him as Robert Mandich while GARLAND operated undercover at Washington State University (WSU), Pullman, WA in 1974-1976, posing as a student co-resident on the same residential floor of the WSU Perham Hall student dormitory in 1974-75 and as a student neighbor in WSU Nez Perce Village student apartment housing in 1975-76 while driving a well-used green Mercury Capri, in support of this illegal program under the supervision of BREYER, its apparent field executive then housed first in Kent, WA, then in Spokane, WA (paragraphs 99d, 111, 211, 417-419).

722. While a Washington State University, Pullman, Washington (WSU) undergraduate, Lead Plaintiff had a nearly two year relationship with Susan B. Irish, which included an overnight canoe trip to Dworshak Reservoir east of Lewiston, Idaho accompanied by a WSU Recreation Department group which had two males camping in an adjacent tent. This event

sequence bore a strong resemblance to the camping trip he had taken at the age of 12 with Gary Jack where he was oxytocin (love hormone) hijacked in a California State Park for illegal biomedical experiment without consent with no direct sexual abuse, by the use of a local BRMT hormone manipulation device triggered by two males in an adjacent tent camping spot. Lead Plaintiff also noted, during forensic review in 2021, the likelihood of certain oxytocin enhancements of Katherine “Kit” Andrews and the simultaneous flattening of Lead Plaintiff oxytocin levels while an undergraduate, which likely were illegally BRMT bioweapon and bioweapon delivery system hijacked. This was noted in particular, as the potential for such a relationship was specifically verbally minimized by then close friend and co-resident of Perham Hall, William SACKVILLE-WEST, the ostensible son of Jack Sackville-West (BREYER), after Lead Plaintiff was called out during a Cougars basketball game by Katherine’s roommate, a WSU cheerleader, to join the skylined Katherine in the vacant school band section diagonally across the Performing Arts Coliseum from Section 51 where Lead Plaintiff was sitting at the time with Bill SACKVILLE-WEST and Craig PAGE. Lead Plaintiff graduated in June 1977 with a BA degree in Business Administration.

723. In February 1978, Lead Plaintiff returned to defendant WSU as an MBA program graduate student. Defendant WSU provided the Lead Plaintiff with the MBA student employment which allowed him to attend, an office assignment with a defendant CIA Iranian asset officemate and assigned professor/student employment and academic advisor of the Lead Plaintiff to the embedded federal agent professor SHAFFER. SHAFFER was Lead Plaintiff’s primary graduate school contact in the WSU faculty. SHAFFER, to whom Lead Plaintiff acted as a Teaching Assistant, was allegedly formerly employed by a petroleum company (a CIA tradecraft rhyme which alluded to the Iranian CIA asset with whom Lead Plaintiff then officed).

SHAFFER was joined by Don Yale, likely the ARMY embed posing as a retired Navy Supply officer and Assistant Professor.

724. Other national security entanglements also occurred in this time period including, without limitation, being assigned to co-office with Hamid Bahari-Kashani, an Iranian national economics PhD candidate and supporter of the Shah of Iran, whose family doubtless had CIA or other US connections. Bahari-Kashani, an Iranian national whose family was connected to and loyal to the Shah of Iran (installed as penultimate head of state with help from CIA). The Shah abdicated and left Iran in January 1979 as described at paragraphs 421-424 above. Lead Plaintiff was then reassigned away from his shared office with Bahari-Kashani to a shared office in the basement of Todd Hall (now Carson Hall) with defendant CIA and FBI personnel then attending the WSU MBA program.

725. During WSU Spring Break sometime in March or April 1979, CIA Director Stansfield Turner walked past the completely ignorant Lead Plaintiff with an intent knowing stare in the rotunda of the East Building of the National Gallery of Art (during his return to WSU from a job interview trip to GTE in Stamford, CT he spent much of the Spring Break week in Washington, DC), as Stansfield Turner examined Lead Plaintiff (Appendix 2 paragraph 1-008, 1-009), one of defendant CIA and ARMY's unwitting illegally subjugated human medical experiment victims used for illegal BRMT bioweapon and bioweapon delivery system development. Years later, Turner would upgrade him to first class on flight from the Sackville-West memorial service burial of that legend, in a tradecraft joke he played on the unwitting Lead Plaintiff many years later in the 1990s, shortly before BREYER was being upgraded from First Circuit appellate Judge to Associate Justice on the Supreme Court.

726. While enrolled in the defendant WSU MBA program, Lead Plaintiff met Michael WORTHY, who was then not recognized as having been a key FBI illegally embedded agent working at Larry's Market during the wrecking of Larry's Market, which had been underway as the Lead Plaintiff worked at Larry's Market in 1972-1974 (paragraphs 99k, 418, 422, 493, 726, 762 table, 770, 805AG, AK). WORTHY (defendant FBI) was identified through his appearance in a still photograph with defendant WEISSMAN, which was displayed behind WEISSMAN in 2023, during an MSNBC television interview with defendant MELBER). Other defendant FBI and CIA agents also attended WSU MBA graduate school, included EPSKAMP, WORTHY, ZOULAS, and THORPE, who reappeared in various roles during Lead Plaintiff's professional employment over the following twenty-five years.

727. Lead Plaintiff was referred by his WSU MBA professor Dr. Paul Shaffer (CIA faculty embed), to Deloitte Denver, who then further referred him to Deloitte Seattle which he joined in August 1979, working as an auditor for about six months, then as a consultant, and later as a consulting Manager. This Deloitte Seattle commercial cover operation, actually hosted by defendant USMS, provided commercial covers for CIA commercial cover international espionage projects, and for FBI domestic spying and investigations (Appendix 2 paragraph 1-010 through 1-012).

C. Defendant WASH State of Washington

728. Defendant State of Washington (WASH), including various unknown state agencies and local government units to be identified in discovery, which were funded and enlisted by WASH, deployed and detailed current and former government employees in various positions in cover entities used to employ or which permitted volunteer service by Lead Plaintiff to maintain the appearance of normal personal, educational, and professional life, while actually sustaining Lead Plaintiff's involuntary servitude at all times. Nearly all the defendant WASH state and local

government employees later returned to publicly visible positions in state and/or local government employment, most probably never having actually left such employment for the cover positions to which they were deployed to provide logistical support to the illegal BRMT bioweapon and bioweapon delivery system program and associated-in-fact enterprise pattern of racketeering acts and conspiracy, including conspiracy against rights. This pattern continued from the time of the Lead Plaintiff and his family of origin's return to Washington state in 1963, from surreptitious FBI employment at Pacific Paper Products while in CA, to defendant FWSD for third grade elementary school until he left WSU MBA graduate school in June 1979, and was then employed in August 1979 by Deloitte Seattle.

729. These defendant WASH state funded departments agencies and governments were most probably supported by DOJ and other federal grants to provide this logistical support to the illegal BRMT program in support of defendant BREYER's program management in Washington state. Participating defendant WASH departments and agencies included, without limitation, defendant WASH Governor's Office (WASH state employee Terry Buckles in 1973-74, also later known as Wolfgang Opitz), Washington State Human Rights Commission (Terry Byington, who acted as AeA Executive Director during Lead Plaintiff's fraudulent employment at LazerSoft and CNA, paragraphs 729, 735, 762 table), Green River Community College (among others, Terry Buckles, Washington Library Network, later known as Wolfgang Opitz, staff of WASH Governor Locke and Office of Financial Management), and David BRUNTON and Donna DICKOVER during Lead Plaintiff's GRCC 1973-74 freshman year.

730. BRUNTON and Donna DICKOVER then transferred with Lead Plaintiff to defendant WSU Washington State University during undergraduate studies in 1974-77. Lead Plaintiff's Perham Hall dormitory resident, resident assistant, neighboring Perham Hall floor

resident assignments, and his class assignments, were constructed to accommodate the illegal BRMT bioweapon and bioweapon delivery system program. Defendant WASH also provided further personnel resources in the Spokane area, including several individual employees who posed as BREYER family members when BREYER appeared there as Jack SACKVILLE-WEST while ostensibly working as a Spokane area public facilities architect who lived at 1424 S Maple Street, Spokane, WA, while Lead Plaintiff attended defendant WSU, an independent agency of defendant WASH.

731. Terry Buckles, paragraph 729 above, reappeared as Wolfgang Opitz, Governor Locke's supposed advisor on Higher Education, who then moved to the Office of Financial Management, all while the Lead Plaintiff conducted the Higher Education Task Force for the American Electronics Association (AeA), then directed by detailed WASH employee Terry Byington, during the Governor Locke administration (paragraphs 729, 735, 762 table).

732. Laurie DOLAN was fraudulently presented with others as a daughter-in-law married to son David (supposed son of Jack) SACKVILLE-WEST in Spokane, WA beginning in Fall 1974-77 (paragraphs 111, 211, 805AT). DOLAN later joined her fellow defendant WASH state employee college classmate Governor Chirstine Gregoire in 2005 as the governor's Chief of Staff and may have served on Gregoire's staff while Gregoire was defendant WASH Attorney General.

733. The Governor Spellman administration detailed Joseph L. McGavick as a Director in the Deloitte Seattle cover company office run by defendant USMS personnel and HOPPER in support of defendants UNITED STATES, DOJ, FBI, CIA, and ARMY in the early 1980s. Defendant WASH conspired and participated in the illegal human trafficking process and BRMT bioweapon and bioweapon delivery system program involuntary servitude imposing forced labor

on Lead Plaintiff through these acts, violations, and injuries in support of defendant BREYER, the illegal BRMT bioweapon and bioweapon delivery program, and defendant UNITED STATES' illegal human subject medical experiments on Lead Plaintiff and others in this class of plaintiffs.

734. A then former political aide to defendant WASH Governor John Spellman, McGavick was deployed to Deloitte Seattle from 1979 to approximately 1983, and while there worked with Lead Plaintiff and assisted in the deployment of illegal defendant FBI general surveillance operations into the City of Tacoma, Tacoma Public Utilities, City of Bellevue, Pierce County, Clallam County, Thurston County, Seattle School District, all in Washington state, and Buffalo New York School District, Spring Texas School District, San Francisco School District, the latter with Bannon (defendant CIA, then known as Timothy C. Easton, Deloitte Seattle Manager, then Director). McGavick returned around 1983 to state employment at the Washington State Liquor Control Board as a Commissioner. McGavick also orchestrated deployment to Deloitte Seattle, for a time, of retired Seattle School District Superintendent David Moberley who worked as a contractor, and of the Seattle School District's former chief finance officer Pat Moyer, who worked as a project manager. A former Spellman administration era Washington State Treasurer was also detailed to Deloitte Seattle for about 18 months.

735. AeA Executive Director Terry Byington, another assigned defendant WASH employee, was deployed from the defendant WASH Human Rights Commission. Byington returned to state employment at Lake Washington Technical College after acting as a security picket and contact of the Lead Plaintiff while he was at LazerSoft in Bothell from 1987-89, where the company had been relocated from north Seattle, WA by then CEO Stone (CIA,

working with BURNS) in 1987, and again while the Lead Plaintiff was at CNA in Bellevue, WA, employed by defendant FAUCI.

736. These and other illegal involuntary servitude federal cover company fraudulent employment operations including, without limitation, Deloitte Seattle, LazerSoft, PAN, Pacific Pipeline, CNA, and ESTABLISH, were typically run day-to-day by defendant USMS for use as cover operations by various defendant UNITED STATES departments and agencies including, without limitation, DOJ, DHS, DOD, CIA and other police powers operations of defendant UNITED STATES. Based upon tradecraft security backcheck comments made by Dave Brown, an employee at CNA, Rod Proctor was most probably the actual defendant DOJ/USMS manager overseeing the AeA technology industry trade association cover operation and Byington in Washington state, which included Ian McGregor, a defendant FBI agent posing as a contract lobbyist, who ran intelligence probes against defendant WASH government legislators, departments, and agencies, and at one point instructed the unwitting Lead Plaintiff to time a specific campaign donation at a particular time, apparently as part of one of those probes. Proctor's cover was Redmond, WA based analog to digital telecommunications technology cover company Tone Commander, most probably formed, funded, and sustained by defendant USMS in the aftermath of the 1982 AT&T telecommunications breakup, to facilitate intelligence operations and illegal general surveillance and *Fourth* Amendment violations.

737. Paragraphs 737 through 739 are reserved.

D. Defendant KCSD – King County Sheriff's Department

740. Defendant King County Sheriff's Department (KCSD) acted and conspired against plaintiff's rights in support of the criminal and illegal operations of defendant UNITED STATES (DOJ, FBI, CIA, ARMY, USMS, DHHS, NIH, NIAID, BREYER, WEISSMAN, ROSENBERG, HOOPER, BURNS, FAUCI, and other defendants named herein) throughout these plaintiffs'

tenure in King County, Washington beginning in the 1950s (paragraph 1, 805L, 833E), under Directors Hoover (FBI, #1) and Helms CIA, #8), and continuing under Director Wray (FBI, #8) and Burns (a direct perpetrator individually named herein, now Director, CIA, #16), with evidence to be provided subject to discovery. Among the myriad acts, violations, and injuries in this complaint, Sandra Darlene Brewer, age 11, was administered a lethal dose of codeine and aspirin in Federal Way, WA, deliberately inducing Reye Syndrome (paragraphs 417, 803, 805), and died within 48 hours in a Pierce County, WA hospital in April 1970, at the hand of an embedded medical doctor KOHLER (paragraphs 99d, 417, 418, 714, 740, 803C-D, 805B(i), H, S, BS, 806B, 814B) working within or on behalf of defendant UNITED STATES illegal BRMT bioweapon and bioweapon delivery system program (which then coexisted with defendants ARMY Bioweapons Lab and CIA's illegal LSD drugging program MKUltra run by Dr. Sidney Gottlieb) while it was managed by defendant BREYER.

741. This corrupt police powers conspiracy continued at least throughout the tenure of Lead Plaintiff and his extended family in King County, WA between 1955 and 2005 under the series of defendant KCSD Sheriffs, much as the Pierce County WA Sheriff's Department conspired with the Carbone crime family for decades in adjacent Pierce County, WA until the late 1970s, when Sheriff Janovich was indicted and convicted only after ATF uncovered the Carbone/Pierce County Sheriff's department relationship and turned over its investigation to defendant FBI, which had previously ignored Pierce County for years despite dozens of numbers-racket, prostitution, and related tavern arson fires in and around the federal Fort Lewis/McChord military bases.

742. Unlike Pierce County, where the US Attorney for Western Washington eventually brought criminal charges and secured the conviction of Sheriff Janovich for that decades long

criminal racketeering conspiracy, this corrupt conspiracy in King County, WA was never prosecuted, even after the Lead Plaintiff visited and personally served an FTCA complaint letter on the US Attorney for Western Washington office in 2005, never answered (paragraph 320), because it involved illegal operations conducted by defendant UNITED STATES, DOJ, and other federal departments and agencies as the principal conspirators in this criminal conspiracy against the Lead Plaintiff and his extended family. This defendant DOJ fraudulent concealment pattern has been repeated in the Eastern District of Massachusetts from 2005-2007, District of New Jersey since at least 2007 (paragraph 320) and the Southern District of New York at least since 2018 (paragraph 320, 550-584), as well as in federal district courts in those two districts, and in the District of Columbia (Appendix 1).

743. Defendant KCSD Deputy David REICHERT joined defendant KCSD as a deputy in 1972, around the same time his subordinate Gregory R. Boyle joined defendant KCSD. REICHERT progressed through the ranks and was elected Sheriff from 1997 until 2005. Reichert worked with Boyle as a trusted subordinate for many years as a patrol deputy, detective, task force leader, and other assignments in the department. Boyle served under REICHERT as a Green River Task Force detective which tracked the King County serial killer, then as the task force leader, and later as Maple Valley Precinct Commander. Boyle was the first and second husband of Lead Plaintiff's romantic partner and first wife Lynne. Boyle and Lynne shared two daughters who were pre-teens when Lead Plaintiff first met them.

744. REICHERT's 1972-2005 KCSD tenure encompasses the period from Lead Plaintiff's first employment as a teen in 1972 at the defendant FBI infiltrated and secretly co-owned Larry's Market (paragraph 418), through his graduation from the BREYER/BRMT corrupted defendant FWSD Decatur High School in 1973 (paragraph 716) to the end of

BREYER's tenure as Lead Plaintiff left graduate school in 1979, through Lead Plaintiff's introduction to Boyle's former wife Lynne Boyle, orchestrated by BREYER, HOPPER, and unknown others at the illegal cover company Deloitte Seattle (paragraph 609 HEXP-6), through Lead Plaintiff's marriage to Lynne and his support of Boyle's two daughters from pre-teen to college and departure from the family home, through the subsequent destruction of the Lead Plaintiff's marriage to (paragraph 609 HEXP-6) in 1987-88, soon after Boyle's two daughters had left home for college, and through his subsequent orchestrated fraudulent marriage to Jeanette (ARMY) orchestrated by CIA's BURNS, WATERS, and other defendants, and through the following years of depredations to and including the torture to suicide ideation sequence by FAUCI and others in the early 2000s, before REICHERT departed for Congress.

745. This 1972-2005 King County, WA time period also includes Lead Plaintiff's orchestration in 1988 (by defendants WATERS and BURNS, and unknown others) and subsequent fifteen years of the fraudulent marriage to Jeanette from 1990-2005 (paragraph 610 HEXP-7), when defendants ROSENBERG, FAUCI, PRAY, CALDWELL, and other defendants orchestrated his final divorce, psychological and financial destruction, and human trafficking to Boston, MA in December 2005.

746. Between 1979 and 2005, this time period in King County, WA, also included numerous severe injury to lethality attempts while he lived at NE 113rd Street in Redmond, WA with Lynne, at 149th Street, Kirkland, WA with Jeanette adjacent to the defendant BURNS' residence (paragraph 695 LETHL-2), which period included, without limitation, an entrapment operation at Stevens Pass (paragraph 621 RGTS-1) multiple fraudulent employments in defendant UNITED STATES illegal cover operations in King County (paragraphs 600-603 NSEC-1-3) as well as the financial, sales, litigation, and bank frauds used to destroy multiple

private enterprises of Lead Plaintiff in King County (paragraphs 639-641, 645, 649-653 RICO-1-3, 7, 11-15), and nearly the entire coercive psychological operations/torture/suicide ideation sequence by defendant FAUCI and co-conspirators in 2002-2005 (paragraphs 403-464, 490-520).

747. REICHERT was born in Detroit Lakes, MN, and knew and was known to Orland Howard, an associate of CORNWELL (defendant CIA) at PAN. Howard reported to Lead Plaintiff in 1993-94 while Lead Plaintiff was PAN Chief Operating Officer during those defendant UNITED STATES employment and compensation frauds against Lead Plaintiff, as conspired and perpetrated by defendants UNITED STATES, CIA, FBI and unknown individual defendants to be identified, paragraphs 450-451, 601 NSEC-2. Howard allegedly operated a railroad right-of-way recycling operations known as Northwest in Detroit Lakes, MN, which disposed of old telegraph lines from mainline railroad rights-of-way and was one of three businesses placed under the PAN umbrella for an alleged financing, (and CEO Cornwell, CIA) which was actually a defendant CIA/FBI fraudulent cover company operation used to sustain involuntary servitude and to pretext and entangle Lead Plaintiff in another of these defendants' series of fraudulent enterprises, financing, and cross-border activities with RCMP, CSIS, MI-5, MI-6, and London Metropolitan Police, as described at paragraph 601 NSEC-2.

748. REICHERT replaced Dunn in the US House of Representatives in 2005 and remained there until 2019. REICHERT's departure from defendant KCSD to Congress came less than 12 months before the Lead Plaintiff was human trafficked in December 2005 from King County, WA where he had lived from 1955-1961 and 1963-2005 to Boston, MA. Representative Dunn had conspired in her role in Congress, including by conducting the behavioral baseline interview in Washington, DC in support of the subsequent episodes of torture by FAUCI

described in paragraphs 604-607 HEXP-1-4, to support the involuntary servitude process on behalf of the Bush administration and defendant DOJ under Attorney General Alberto Gonzales.

749. As REICHERT began serving in Congress in 2005, DOJ AG Gonzales placed defendant ROSENBERG as US Attorney for South Texas briefly in 2005-2006 during the 2005 human trafficking before moving him to the US Attorney for Eastern Virginia so he could then act in the role of ESTABLISH General Manager as Lead Plaintiff was trafficked to Fort Lee, NJ from Boston in August 2007 for further illegal BRMT bioweapon and bioweapon delivery system abuse to and including torture and suicide ideations and coercive kidnapping for the explicit purpose of coercing dismissal of federal civil rights litigation in 2010-11.

750. The King County, WA based portion of the on-going FAUCI (UNITED STATES, NIAID) led illegal BRMT bioweapon and bioweapon delivery program and defendant FBI-led rights and racketeering operation against Lead Plaintiff was shut down in 2005. Principal elements of this late 2004-2005 shut-down year operations were (i) forced fraudulent spouse Jeanette moved out and divorce from Jeanette was completed, (ii) the forced sale of the NE 149th Street, Kirkland, WA residence occurred as the wrecking of Allegent, LLC was completed, (iii) remote BRMT inflicted torture sessions were undertaken at 149th Street, and (iv) then again at the 124th Avenue NE, Kirkland, WA apartment to which Lead Plaintiff was surreptitiously forced to relocate after the local illegal BRMT bioweapon and bioweapon delivery system psychological operations and security detail vacated that 84 unit apartment complex and a nearby office building on Slater Avenue NE, abandoning their government-owned undercover vehicles in the apartment building's parking lot. A brief stay at his sister's house in Edgewood, WA resulted in direction from a carefully placed faked family member there that he was not

welcome, also the moment of a cameo as Aunt Joanne by PBS media personality Judy Woodruff, which led to a decision to leave the area out of fear for his extended family's welfare.

751. As REICHERT served in Congress in 2005, Lead Plaintiff was human trafficked, by coercion and bait, to carefully pretexted Boston, MA (paragraph 276A, 320e, 46, 462-464). Defendants UNITED STATES, DOJ, FBI, USMS, CIA, ARMY, ROSENBERG, FAUCI, and unknown others, having lost local police powers support in King County, WA, had conspired and organized Lead Plaintiff's human trafficking in December 2005 to Boston, MA and 21 months of homelessness, and to a new round of torture (paragraph 605 HEXP-2), with the assistance of SUMMERS, formerly known as Roger Penner when he was briefly at Deloitte Seattle in the early 1980s, paragraph 463.

752. Defendant KCSD, including Boyle and REICHERT, acted illegally in conspiracy with defendant UNITED STATES, and with ARPAIO as MARICOPA SHERIFF from 1993-2017, to support this entire operation during Lead Plaintiff's tenure in King County, Washington, which continued until December 23, 2005, and during his frequent visits to Maricopa County, AZ to visit Boyle's daughter Debora (Lead Plaintiff's stepdaughter while married to Lynne) after the marriage to Lynne had been ended in 1988. Boyle is alleged to have died in Sun City, AZ in the later 1990s within the jurisdiction of defendant ARPAIO while MARICOPA SHERIFF, but that event of death from lung cancer has not been confirmed. Evidence of widespread fraudulent concealment of illegal acts by police powers operations has been and remains clear and apparent throughout the pre-discovery forensic review conducted to prepare this complaint.

753. Sue Rahr, who was first employed by defendant KCSD in 1979, succeeded Reichert as Sheriff in January 2005. Based upon her other record of service in police powers operations and subject to discovery, Rahr was plausibly unwilling to perpetuate the local police powers

conspiracy which had been continued under Reichert. According to the Seattle Times, Rahr “served 33 years with the King County Sheriff’s Office and nine years as the executive director of the Washington State Criminal Justice Training Commission. She co-authored “From Warriors to Guardians — Recommitting American Police Culture to Democratic Ideals.” “

754. Rahr’s election as Sheriff ended defendant KCSD protection of this conspiracy. Defendant KCSD including, without limitation, REICHERT while sworn deputy, then Sheriff, and Boyle while sworn deputy, had acted in conspiracy with defendant UNITED STATES (DOJ, FBI, CIA, ARMY, FAUCI, ROSENBERG, and unknown others) to sustain operations of the illegal BRMT bioweapon and bioweapon delivery program in its associated-in-fact enterprise pattern of racketeering acts, rights violations, and other acts, violations, and injuries, from the 1950s through the 2005 human trafficking of Lead Plaintiff from King County, WA, and thereafter with ARPAIO and MARICOPA SHERIFF.

755. Paragraphs 755 through 759 are reserved.

E. Summary – Lead Plaintiff’s Relationships With Federal, State And Local Governmental Defendants

760. Defendant UNITED STATES, DOJ, DOD, CIA, ARMY, NIAID personnel and senior executives both directly perpetrated and supervised illegal BRMT bioweapon and bioweapon delivery system field development test and deployment; constitutional, civil and human rights violations; and racketeering acts, violations, and injuries; all in conspiracy with state and local governments and their employees, in various states where Lead Plaintiff and other plaintiffs have and do reside, work, worship, and conduct other activities of normal life. There is a clear long-running pattern of an associated-in-fact enterprise pattern of racketeering acts and violations of constitutional rights conspiracy, which these individual defendants have and do manage and operate, and which criminal acts and civil injuries are systematically fraudulently

concealed and persistently not prosecuted by defendant DOJ since at least 1961 (paragraphs 550-584).

761. This pattern and the progression of promotions of these personnel from field operations to executive branch senior civil service positions, cabinet officer positions, to judicial, and to congressional roles demonstrates broad senior management awareness among these institutional defendants in various federal, state, and local roles identified herein, reaching back at least to human trafficking for defendant FBI Cointelpro evidence destruction in 1961 (paragraphs 414-416) through Lead Plaintiff's direct human trafficking by ARMY religious discrimination (defendant BREYER, Gary JACK) in 1968 at age 12 paragraph to the present time (Appendix 2 timeline and entirety of complaint narrative at paragraphs 1-37, 403-571).

762. A summary table of the various individual defendant roles, their varying institutional defendant employment and affiliations, and their relationships to the Lead Plaintiff, which are representative of these relationships with other plaintiffs of this class, in defendants' systematic pattern of constitutional rights violations and associated -in-fact enterprise pattern of racketeering acts, for which Congress and state statutes have assigned individual defendant liability at, without limitation, 28 U.S.C. § 2679(b)(2) and 42 U.S.C. §§ 1961-1968, as further described in paragraphs 267-306, follows:

Individual Official	Executive Management Role, Governmental Employer (Known or Presumed)	Field Cover Identity And Role – paragraph reference (LP is Lead Plaintiff)	Notes: Security Backcheck – Operational and Personal
Janet Reno	US Attorney General, DOJ	Lakeland Elementary School LP sixth grade fellow student named Martha under teacher Simpson, 1966-67, FBI	Janet Reno back check conducted in 2014, including brother Charles Jackson (CIA), who was probably Bruce Zuelsdorf at Lakeland Elementary or Lakota

			Junior High School, Federal Way, WA in 1960s
Gary Jack	Unknown, ARMY	1968 CA campground BRMT oxytocin incident with LP (paragraph 417)	Army buddy of LP father Don, same church (whether infiltrator or otherwise is unknown)
Unknown – Lani Fish, Dorothy Fuller	Unknown, DOJ	Lani Fish, Lakota Junior High School, also played french horn alongside LP 1968-70 and oxytocin incident paragraph 415. Later Dorothy Fuller 1988 – paragraph 610A HEXP-7	Fuller was interim romantic interest who held LP between Lynne and Jeanette during this Burns (CIA/ARMY) marital wrecking and fraudulent forced marital community
Unknown – Brad red hair and mustache FBI at Larry’s Market, later Mike Worthy	FBI	Clerk, Larry’s Market, later Michael Worthy WSU MBA, appeared in FBI group photo with Weissman paragraph 99k	
Wolfgang Opitz	WASH Staff Advisor to WA Gov. Locke, then WA Office Financial Management senior manager	Terry Buckles WASH Washington Library Network employee while LP at GRCC paragraph 718. Later Wolfgang Opitz, WA Gov. Locke higher education advisor, OFM senior manager, paragraph 729	
Stephen Breyer	ARMY Intelligence, illegal BRMT program manager, appellate Judge, then Associate Justice US Supreme Court	Fraudulent church Elder Snow, 1970-72, and supervisor of NE Tacoma fraudulent church, then Jack Sackville-West, Spokane, WA from 1974, paragraphs 21(i), 36 table	Stanfield Turner 1979 walk-by at NGA East Building Rotunda, then Jack Sackville-West post memorial service flight upgrade from Spokane to Seattle, shortly before BREYER was upgraded from First Circuit appellate court

			to SCOTUS, paragraph 725
Neal K. Katyal	DOJ, Acting Solicitor-General	Shawn Morrissey, LP fellow student Decatur High School in 1970-71, part of BREYER BRMT team.	Injured in bareback fall from horse at Caudle farm during horse riding informal training with Grady by LP, injured in the same time period as the death of LP's sister Sandra and injury to her surviving twin sister Susan
Andrew Weissman	FBI, DOJ EDNY Asst US Attorney, FBI General Counsel under Mueller	Embedded in cooperative management at Associated Grocers during Larry's Market employment and wrecking, then PCC as GM during LP Board service	Part of BREYER BRMT team
Merrick Garland	FBI/USMS/DOJ, Judge DC Appeals Court, US Attorney General	Fellow undergraduate student Robert Mandich WSU 1974-76, plausibly fellow student Stuart Bettesworth, Decatur High School 1971-72, part of BREYER BRMT team	Bettesworth had an alleged relationship with Mariam Backman, a likely BRMT victim, see paragraph 717 for her other plausible identities across time
Laurie Dolan Chief of Staff to WA Gov. Gregoire, who was also WA AG prior to her service as Governor	WASH, Chief of Staff to WA Gov. Gregoire , also possibly on staff while Gregoire was WA Attorney General	Sackville-West family member by marriage to David, infant daughter Anne	
Hamid Bahari-Kashani	CIA asset, family closely associated with Shah of Iran and SAVAK secret police	Economics PhD graduate student, LP WSU office mate as CIA asset, served as pretext for LP's continuing national security entanglements	Richard Helms was CIA Director 1966-1973 while BRMT BREYER operated on LP at age 12 in 1968-73 and family. Helms was Ambassador to

		by CIA, FBI at WSU. LP's family entangled since by ARMY and CIA in early 1950s, FBI cover company Pacific Paper Products 1961-63	Iran 1973-76. LP assigned to co-office at WSU MBA with this CIA Iranian asset in 1978-79
Gerald L. Thorpe	CIA field operations with Bannon, Blair	WSU MBA, later Deloitte Seattle, then to Deloitte Riyadh Saudia Airlines info tech project (CIA)	
John L. Zoulas	CIA field operations Caribbean, WSU MBA, then Westin Corporate Seattle - CIA	WSU MBA, then Westin Seattle	Pretexting LP into Queen Elizabeth II Seattle visit national security event 1983
Lisa Desjardins	Media, now PBS Congressional Correspondent	Allene Sampson, while LP was WSU MBA student	Possibly reintroduced an emotionally frustrated Mariam Backman (from Decatur H.S. one year behind LP and former girlfriend of Stuart Bettsworth) as a Tacoma-area teacher seeking her M.Ed. at WSU during Summer 1978, whose other plausible identities are at paragraph 717. Sampson reappeared near Hisyasu's Kirkland, WA condo during Lead Plaintiff's several months stay there in the early 1980s
David Reichert/ Gregory R. Boyle 1979-2005	KCSD Reichert and Boyle rose together from patrol to detective to Task Force to Precinct to KCSD Sheriff Reichert, later Congressman Reichert	KCSD Boyle was former husband of first wife Lynne, Reichert was immediate superior of Boyle throughout the King County based BRMT program operations, from 1979 to 2005	Field operations from 1979-2005 in WA were terminated shortly after Reichert left for Congress. LP was trafficked to Boston within 12 months after Rahr assumed the KCSD

			Sheriff role (paragraphs 743-752)
Joseph L. McGavick	WASH Staff to WA Gov. Spellman, then returned to WASH as Commissioner, WSLCB	Director, Deloitte Seattle	
Steve Bannon	CIA field operations, EOP under Tump, media	Timothy C. Easton Manager, then Director, Deloitte Seattle	Served as Thorpe's field supervisor at Deloitte Seattle on Central America and Micronesia commercial cover projects, CIA
John R. Blair	CIA field operations	Director Deloitte Seattle, then to Honolulu to support Micronesia projects, then to	Served as Thorpe's field supervisor at Deloitte Riyadh Saudia Airlines info tech project, CIA
Roger Stone	CIA field operations, Republican Party consultant, political operative	David P. Moller Manager, Deloitte Seattle; then CEO, LazerSoft, employed LP as CFO	South Africa ATM project around 1983-85, then to LazerSoft around 1985, where LP was pushed and employed 1986-89
Warren Wilkins	ARMY, WA ANG Colonel	Sales Representative, LazerSoft	Pre-positioned by Stone at LazerSoft before LP became its CEO when Stone removed
R. Kent Tarpley	Plausibly local government at City of Bellevue public utilities, DOJ/FBI/USMS embedded at LazerSoft	Plausibly City of Bellevue cover while LP at Deloitte Seattle, LazerSoft VP Operations under Stone and LP	Pre-positioned by Stone at LazerSoft before LP became its CEO when Stone removed
Stephen Waters	DOJ/FBI/USMS	Embedded as software contractor at LazerSoft 1987-89	Conducted introduction of Jeanette, who became LP's second spouse
William Burns	BRMT program manager, CIA Director	J. Patrick Heffron, Director, Investor, LazerSoft	
Chuck Rosenberg	FBI, US Attorney, Southern District TX then US Attorney Eastern VA,	Chick LeFevre, CEO, NutraSource. Placed in role by Weissman FBI. Later General Manager	Part of BREYER, BURNS, FAUCI BRMT teams

	then DEA Acting Administrator, all at DOJ	Establish, Fort Lee, NJ where LP was trafficked from Boston, then terminated	
Terry Byington	WASH Human Rights Commission staff, AeA, then WASH Lake Washington Technical College staff	AeA Executive Director	Provided physical picket duty adjacent to LazerSoft – Bothell 1987-89, and provided around 1999-2003 Higher Education Task Force support to LP to access WASH political establishment during LP tenure in King County, WA
Anthony Fauci	NIAID Director , DHHS	Alleged CNA Founder, present throughout LP's CNA employment	Persistently described Banner Bank Bothell as a financing source. LP's uncle worked in that same shadow bank unwittingly during the same time period
Lloyd Austin	ARMY General Officer, Secretary of Defense	CNA Project Manager on HomeGrocer.com Renton, WA distribution center around 1999	
Alexander Vindman	ARMY, Lt. Colonel, National Security Council staff	Jeanette blended family brother-in-law, 1992-2004	
Ari Melber	FBI, SDNY Asst. US Attorney, DOJ, MSNBC media anchor	Wes Lewis, husband of Theresa, Jeanette blended family brother-in-law 1992-2004, FBI	
Lisa Rubin 92-04	FBI, SDNY Assistant US Attorney, DOJ, MSNBC media commentator	Michelle Yarbrough, Jeanette blended family sister-in-law 1990-2004, FBI	
Orland Howard	Unknown police powers affiliation, possibly KCSD	CEO, Advantage, a PAN subsidiary, reported to LP and Cornwell (CIA), 1993-94	Same hometown, similar age to Reichert, then a senior KCSD commander. Likely an associate from small town

			Detroit Lakes, MN, or a KCSD deputy using this as cover legend
Gil Kerlikowski	Reported to Attorney General Reno while at DOJ, later EOP Drugs Czar, then Commissioner Customs and Border Protection (CBP) at DHS, then Seattle, WA Chief of Police	Seattle Chief of Police, crosswalk LP sightseeing once in Seattle while LP under continuing perpetual surveillance, around 2004-05.	Administered community policing grants used to sustain cooperation and support illegal BRMT and racketeering field operations in King County, WA under AG Reno
Raymond Sullivan	US Customs and Border Protection investigator and attorney, possible descendant of 1977-79 Ambassador to Iran Sullivan, who assumed that role and was recalled to DC prior to the hostage crisis. LP shared office space with CIA Iranian asset at WSU MBA 1978-79	Private Attorney, International Trade	Operated as LP's Winnett counsel 2013-2020, introduced by Charles Jackson (RENO's brother) in December 2013, four months before Kerlikowski (then EOP Drug Czar) was confirmed to Commissioner, CBP in March 2014
Robert Mueller	FBI, Assistant Attorney General Criminal Division 1990-93, US Attorney Northern District of CA, where he supervised Caldwell between 1998-01 , then FBI Director 9/4/2001 – 9/4/2013	PPG Industries headquarters building Pittsburgh security backcheck on LP conducted with Rosenberg in 2007 while LP fraudulently trafficked and employed at captive cover company Establish, Fort Lee, NJ Rosenberg was previously embedded as CEO NutraSource by Weissman while at PCC. Rosenberg was chief geographic and employment trafficker, and repeat enterprise wrecker for FBI in WA and NJ	Supervised 13 years of FBI racketeering, including LP enterprise wrecking, and human trafficking, with WEISSMAN and ROSENBERG in field and later executive roles, both FBI. Mueller conspired with FAUCI, NIAID, CIA, ARMY who engaged in marital wrecking, torture, and other violations

		Weissman served as General Counsel and other key functions under Mueller	
Darrell C. Pray	DOJ/FBI/USMS field agent	Embedded DOJ/FBI/USMS agent at CSC, FSA, NutraSource, Pacific Pipeline, Allegent	Long term associate of Rosenberg, FBI. Pray was supposed Allegent LLC co-owner in FBI ShipNow and TSL racketeering of LP's Allegent
Leslie Caldwell	DOJ EDNY Asst US Attorney with Weissman, SF Asst. US Attorney under Mueller, Assistant Attorney General Criminal Division 2014-2017	Intellectual Property Attorney, Seed & Berry	Falsely presented as Seed & Berry legal counsel to secretly co-owned Allegent LLC, concealing FBI direct action ShipNow multiple check frauds and Caldwell litigation fraud against LP interests in interstate commerce
Joseph Arpaio	DEA – Latin America, Arizona, then Sheriff Maricopa County	Greg Crossgrove, Produce Industry Consultant. Arpaio as MCSO Sheriff also plausibly provided venue for KCSD Gregory R. Boyle alleged relocation and death sequence	Frauds in interstate commerce with federal defendants and MCSO officers
FBI SACs, CIA, ARMY, NIAID, and state and local police powers in 44 states, Canada, UK, France, Switzerland from 1979 forward	Various SAC in numerous field offices coordinated local fraudulent sales call operations in TSL Boston office 2003-04 wrecking/trafficking sequence	Various FBI Field Offices in 44 states, 1979 to 2023	Persistent racketeering frauds in career and enterprise wrecking and illegal surveillance. BRMT lethality and torture events, among others

Judy Woodruff	PBS former anchor.	Aunt Joanne December 2005 at sister's Edgewood, WA home	Cameo during faked sister push operation by Rosenberg, FBI in December 2005 trafficking to Boston
Tom Keene	Bloomberg Media former anchor	Michael Callahan, Dominick and Dickerman Managing Director	Fraudulent Dominick investment banker in interstate commerce frauds involving fake investors and fake Walmart organic produce sales proposals

763. Paragraphs 763 through 765 are reserved.

State and Local Government Co-Conspirator Employee Crossover Employment - Adverse Impacts On Lead Plaintiff and Other Class Members

766. Defendant UNITED STATES, its cover entities, and corporate entities with embedded defendant UNITED STATES personnel, and state and local governmental departments and agencies, operating within and across state lines in Washington and Oregon, and subject to further discovery as to specific dates, times, and roles, employed other members of Lead Plaintiff's extended family in defendants' associated-in-fact enterprise pattern of racketeering acts and constitutional rights violations including, without limitation, in their abuses using the illegal BRMT bioweapon and bioweapon delivery system for illegal human subject medical experiments without consent, biochemical hijacking, human trafficking, murder, and other racketeering and rights acts, violations and injuries against these plaintiffs and in both legal operations and in their illegal spying, surveillance, and rights and financial wrecking operations against other parties, without limitation, as follows:

- (i) multiple Lead Plaintiff romantic interests and partners, and both spouses, paragraphs 608-614 HEXP-5-11, who were subjected to illegal BRMT bioweapon and bioweapon

delivery system direct manipulations and illegal human experimentation by defendant UNITED STATES.

- (ii) maternal grandparents Don and Madeleine Thompson - who both worked at the cooperative Farmer's Union Central Exchange (FUCE, then Cenex) in Auburn, WA, and Don for interstate trucking as an owner-operator and as a driver for a hazardous materials tanker trucking operation, Mitchell Brothers near Portland, OR, as well as two years in northern Montana managing CENEX cooperatives in Shelby, Cutbank, and Valier, MT, the latter most probably related to defendant FBI national security operations related to ICBM and missile defense sites in that region
- (iii) aunt Delores Thompson - who worked at the cooperative FUCE (Cenex) in Auburn, WA, and for defendant WASH at the Buckley, WA campus of Rainier School
- (iv) aunt Joanne Brewer - who worked for Social Security Administration in Lakewood, WA
- (v) uncle Bruce Brewer – who worked as an appraiser in the national security zone Hanford Nuclear Reservation after defendant ARMY service, and at the shadow bank Banner Bank Bothell
- (vi) father's cousin Larry Brewer– whose grocery store was secretly owned in part by defendant FBI and financially destroyed during WEISSMAN's tenure embedded at Associated Grocers, the regional grocery for independent supermarkets based in Seattle, WA
- (vii) sister's husband Jerry Hansen – Boeing, in its model shop which handled classified shapes and parts for wind tunnel testing and similar purposes
- (viii) brother Jeff Brewer – who worked for a US military demolition contractor at various facilities in and around Puget Sound, WA

(ix) father Don Brewer - in Boyd's Coffee and in Miller-Cascade (a Stevedoring Services of America affiliate or subsidiary owned by the Smith family and operated at the time by Ricky Smith) which acquired Pacific Gamble Robinson in May 1986 (and thereby the embedded defendant UNITED STATES accounting staff member Christensen, who also worked with defendant ROSENBERG), which was consolidated as Food Services of America (FSA).

Entities With Known Embedded Agent Which Employed Class Members

767. Lead Plaintiff's father Don was employed by Miller-Cascade as a coffee route sales representative, which consolidated with Pacific Gamble Robinson (where embedded federal officer Christensen had already been working prior to father Don's employment there, and where Lead Plaintiff, Don's son, had been recruited for a position after his undergraduate program at defendant WSU in 1977) into FSA. At some point, defendant UNITED STATES acted surreptitiously through an embedded human resources manager to orchestrate FSA hiring of embedded federal officer PRAY from CSC, where he had been embedded on the CSC Alaska Retirement Systems information services contract in Juneau, AK. Pray installed IBM System 36 minicomputers and software systems at FSA headquarters and its branch locations. As FSA employed PRAY, Christensen, and a CEO whose name is not recollected, the company began experiencing financial difficulties. That CEO was fired, along with Pray and other senior managers, by principal owner Ricky Smith in a manner characterized by Pray as a "hostile takeover." That former FSA CEO then went on to the Portland unit of grocery wholesaler McLane as Smith replaced the FSA management team. Embedded federal officers PRAY and CHRISTENSEN then joined defendant ROSENBERG at NutraSource to continue the illegal spying and wrecking operations against organic and natural foods buying clubs, small businesses, and PCC, which continued well beyond defendant WEISSMAN's initial organization

of NutraSource and his subsequent departure from PCC as its illegally embedded General Manager (paragraphs 11, 425-436).

768. Lead Plaintiff had himself previously been recruited to Pacific Gamble Robinson as a regional food service sales representative for southwest Oregon in 1977 while a defendant WSU undergraduate, but declined to accept the position. Lead Plaintiff served on the Boards of NutraSource and PCC while employed at illegal cover company Deloitte Seattle. Lead Plaintiff served on the Board of illegal cover company Pacific Pipeline with defendant ROSENBERG then as Pacific Pipeline COO and employed CHRISTENSEN and PRAY at Pacific Pipeline. Lead Plaintiff also worked at CNA as defendant FAUCI used shadow cover bank Banner Bank Bothell, which was then employing Lead Plaintiff's uncle during the same time period.

769. Lead Plaintiff and defendant PRAY formed Allegent, LLC, and defendant PRAY used another shadow bank in Bellevue name not recollected to fund the illegal co-ownership of Allegent by PRAY, the embedded federal officer in this repeat of the associated-in-fact enterprise pattern of racketeering acts. Allegent was financially wrecked in the course of sequence of defendant FBI financial and litigation entrapments and involuntary servitude and forced labor with co-conspirators CALDWELL and FAUCI. Allegent, LLC had been legally organized by attorney Michael Larson, who also managed the ShipNow and CNA litigation against those entities, which were actually cover entities and illegal operations of defendant UNITED STATES used by defendants DOJ, FBI, USMS, CIA, ARMY, and who (Larson) had been referred to Lead Plaintiff by another embedded federal agent, John C.T. Conte, who had befriended the Lead Plaintiff in 1987 when Lead Plaintiff was seeking investment financing for LazerSoft.

770. This repeat of the associated-in-fact enterprise pattern of racketeering acts at Allegent, LLC, directly links this pattern of racketeering acts back to Lead Plaintiff's original

employment at Larry's Market, Federal Way, WA, co-owned by Lead Plaintiff's father's cousin Larry Brewer in the 1970s, and financially wrecked while secretly co-owned by defendant FBI through an FBI agent who posed as the supermarket's produce manager and business partner. Larry's Market employed a red-haired and mustached clerk, who was later known to Lead Plaintiff as Mike WORTHY at defendant WSU MBA graduate school and thereafter. WORTHY (paragraphs 99k, 418, 422, 493, 726, 762 table, 770, 805AG, AK) appeared in a defendant FBI group photo with WEISSMAN in the home office background behind defendant WEISSMAN during an MSNBC Ari MELBER interview in late Summer or Fall 2023.

Other Lead Plaintiff Related Class Members' Involuntary Servitude Employment Patterns

A. First Spouse Lynne's Employment Pattern

771. Lead Plaintiff met his first spouse, Lynne Boyle, on the Deloitte Seattle financial audit of Safeco, where he was assigned as an auditor before joining the management consulting practice. Lynne had completed her accounting degree at the University of Washington in June 1979 and joined the audit staff as a staff auditor. She was employed and promoted normally for three to four years on a series of financial audits. She joined US West New Vector Group, the cellular telephone spin-off from AT&T a few months after the Lead Plaintiff had trained the accounting manager during the initial start-up of the spin-off in Bellevue, WA. Her employment there soon after Lead Plaintiff's training sessions is now understood to be an element of the conspiracy, not a coincidence. It was another step in the illegal BRMT bioweapon and bioweapon delivery system development process, as local BRMT bioweapon devices were illegally concealed in cellular telephone equipment boxes (full duplex transceivers) installed in both family vehicles by SWAIN, the installation shop then used and later purchased by US WEST New Vector Group. These and other locally installed systems were used to trigger various illegal human medical experiments including, without limitation, the Stevens Pass entrapment

attempt (paragraph 621 RGTS-1), the Porteau Cove double murder attempt (paragraph 694 LETHL-1), and the SWAIN marital breakup (paragraph 609 HEXP-6).

B. Second Spouse Jeanette's Employment Pattern

772. Lead Plaintiff met Jeanette, his fraudulently orchestrated and coerced second spouse (coerced bisexual ARMY active duty deferred military criminal prosecution status), while she was temporarily employed as a receptionist at First American Title Insurance Company (FATCO Bellevue), Bellevue, WA in 1988, during a defendant UNITED STATES operation orchestrated by defendants FBI, CIA, ARMY, WATERS, BURNS and unknown others. Soon thereafter, Jeanette transitioned from temporary contract employees status and became permanently employed at FATCO Bellevue, working alongside embedded co-worker Laurie Vanderberry, the wife of Kerry Vanderberry, then known to be a defendant FBI agent on the bank robbery squad in the Seattle field office. Jeanette frequently mentioned her difficulty in engaging in role playing sessions in office training. This became an apparent psychological inhibitor, most probably actually a form of illegal BRMT bioweapon and bioweapon delivery system mental torture by defendant BURNS (the cross-street resident on 149th Street), to her continued employment with First American in 1994, sometime after a November 1993 family bankruptcy caused by defendant UNITED STATES destroying Alliance, paragraph 610 HEXP-7, 649-651 RICO-11-13.

773. Jeanette left First American and operated as an independent ACT software consultant from around 1994, during which she experienced long hours and frequent bouts of mental confusion by illegal BRMT bioweapon and bioweapon delivery system hijacking in these defendant CIA, ARMY, NIAID, BURNS, and FAUCI illegal human subject biomedical experiments. During this period, she worked with a variety of clients including her former FATCO Bellevue client real estate sales agents and brokers, which included illegally embedded federal police powers personnel, as well as Key Technologies in Walla Walla, WA, where Lead

Plaintiff's cousin Burt and family were under the surreptitious surveillance, and most probably illegal BRMT bioweapon and bioweapon delivery system brain biomanipulations, which were also most probably being used in abuse of the Lead Plaintiff's uncle Bruce's family in the Tri-Cities, WA region (Hanford Nuclear Reservation national security zone). Jeanette also worked at Alaska Brewing in Juneau, AK, and with the Kemper Freeman real estate development company. In each of her clients, she dealt with sales contact databases which could easily be illegally accessed by defendant FBI, USMS and other federal police powers and intelligence operations to engage in illegal remote spying on those companies and those companies' own customers through accessing Jeanette's database downloads for her customization projects undertaken for those clients.

C. Father Don's Employment Pattern

774. Lead Plaintiff's father, Don, worked at Nelson Lumber and Hardware as a part-time job, then full time after high school in Enumclaw, WA until drafted during the Korean War by defendant Army where he served as a medical corpsman, returned to Nelson Lumber and Hardware, then went to Fibreboard, Sumner, WA, followed by employment in defendant FBI's captive cover company Pacific Paper Products, Tacoma, WA, (1961-63) unwittingly assisting FBI to destroy evidence of its Cointelpro program violence in northern and then southern California; followed by defendant FBI handling which continued at Smith Brothers Dairy, Kent, WA as a route deliveryman, where he later purchased a Des Moines, WA area delivery route from Alan Fisher, as Earl Keller, his defendant FBI handler posed as a fuel oil salesman. BREYER, defendant CIA/ARMY's handler was pre-positioned as Snow in the late 1960s and was the fraudulent Sunday home church elder where the Lead Plaintiff's family was abruptly reassigned, together with the reassignment to northeast Tacoma for Wednesday night services immediately

after Sandra's 1970 death. The family was then reassigned again around 1972 to another set of home churches.

775. Following defendants BREYER, CIA, ARMY, FBI, DOJ, and UNITED STATES (and unknown others), Summer 1974 oxytocin family destruction excursion (paragraph 415), Don sold his dairy products route, and was then illegally handled through Boyd's Coffee, which was followed by employment at Miller Cascade, the subsidiary or affiliate of SSA consolidated with PGR to form FSA, where federal agent Christensen was illegally embedded as a result of the PGR consolidation into FSA. Don then purchased and rehabilitated an abandoned poultry farm, which he later sold, then moved to a South Hill, WA home, where he semi-retired, returning to part-time working at Smith Brothers Dairy, Kent, WA, as a delivery route relief driver, before moving again in South Hill, WA, to the current home he shared with Lead Plaintiff's mother until his death.

776. At his death, Don was suffering from severe hearing loss and sight loss from macular degeneration, plausibly related to illegal human medical experiments on eyesight, which Lead Plaintiff has experienced through (i) lengthy periods of repeated torturous headache sessions in Boston, MA and Cliffside Park, NJ (paragraphs 602C NSEC-3, 605A-C HEXP-2) which effect different parts of the visual system and (ii) through flattened (non-stereoscopic) images directly placed by illegal BRMT bioweapon and bioweapon delivery system hacks upon either (a) his lateral geniculate nucleus (most plausibly only one of the two as the image was non-stereoscopic) the two visual processors between the eyes, or (b) on his visual cortex in the brain when the precursor 1549 image was placed in the weeks leading to the January 15, 2009 US Airways 1549 Hudson River emergency landing, as related at paragraphs 602Z, 606B. As he

was going blind and deaf, Don elected not to treat a pre-leukemia condition, which led to his death within about six weeks on October 4, 2015.

D. Uncle Bruce's Employment Pattern

777. After his defendant ARMY service, Lead Plaintiff's uncle Bruce was employed by Walla Walla Federal Savings and Loan, which failed during the 1980s S&L crisis. Soon thereafter, unable to find other work, Lead Plaintiff's uncle Bruce became an independent real estate appraiser, then moved from Walla Walla, WA to Tri-Cities (Richland, Kennewick, Pasco, WA) in the mid-1980s. Tri-Cities was built around federal government operations at Hanford Nuclear Reservation, where weapons-grade uranium was produced during World War II. Weapons grade plutonium production began in the 1950s. Hanford Nuclear Reservation operated until 1965-1987 as the nuclear reactors used in production of weapons-grade plutonium were successively shut down. The region hosted defendant FBI national security counterintelligence operations and agents.

778. Bruce was then hired by Banner Bank, Bothell, WA in the 1990s. This shadow bank, hidden under the name of the regional Banner Bank, was used by defendant UNITED STATES to launder the funds which subsidized loss leading cover operations of CNA Industrial Engineering, where Lead Plaintiff worked from 1996-2002. Defendant FAUCI frequently referenced Banner Bank Bothell in his discussions with Lead Plaintiff regarding the funding of CNA operations, most probably to backcheck operational security to determine if the unwitting Lead Plaintiff had made any connection with the parallel manipulation of the uncle Bruce who worked at Banner Bank Bothell. Bruce retired from Banner Bank Bothell back to Walla Walla, WA, his old college town and his wife's hometown, where his son Burt and his wife were raising Audrey, their oldest child, and other grandchildren, murdered at age 18 in an illegal BRMT

bioweapon and bioweapon delivery system assassination field test of tools of violence in September 2011, described at paragraphs 803, 805.

E. Maternal Grandparents' Employment Pattern

779. Lead Plaintiff's grandfather Don Thompson was an Enumclaw dairy farmer in the 1950 who sought outside employment at Farmer's Union Central Exchange Cooperative (FUCE, now CENEX), Auburn, WA where he was promoted to Manager until ousted by the local coop Board, which plausibly was coopted by defendant FBI embedded agents, then became an independent trucker, then was plausibly trafficked by defendant FBI to manage CENEX coop location in Shelby, Cutbank, and Valier, MT, for about two years, most probably during national security investigations, then returned to Auburn, WA and employment at Mitchell Brothers, a hazardous material line haul trucking company, then retired.

780. The coopting of coops by defendant UNITED STATES with no plausible basis for their legal presence in these private sector operations, which defendant FBI has sometimes used to destroy other private enterprises and the cooperatives themselves, is a clear pattern of racketeering enterprise conduct, based upon Lead Plaintiff's own direct experience at PCC, Seattle, WA and its affiliate, NutraSource. Further, Lead Plaintiff's grandmother complained of the same form of episodically recurring plausibly BRMT induced intense headaches after retirement and return to Auburn, WA, as the Lead Plaintiff has experienced during documented torture episodes described at paragraphs 602C, 605A-C, indicative of the scope and duration of the extended family's experience with the illegal BRMT bioweapon and bioweapon delivery system, illegal human subject experimentation, extent and duration of human trafficking, the overall patterns of associated-in-fact enterprise racketeering acts and conspiracy, and the conspiracy against rights by these defendants.

F. Other Class Member Employment Patterns Subject to Discovery

781. Other extended family members and romantic partners have similar distinctive employment patterns, but the scope and duration of those patterns is not well-known at the time of the preparation of this complaint and are subject to discovery. These employment patterns are representative of the associated-in-fact enterprise pattern of defendant UNITED STATES departments and agencies, and their co-conspirator state and local government conspiracy and complicity to support and sustain systematic violations of constitutional and the associated-in-fact enterprise pattern of racketeering acts from at least 1961 to the present time, all in violations of, without limitation, our Constitution, of constitutional, civil, and human rights, of 42 U.S.C. Chapter 21 Civil Rights and 21B Religious Freedom Restoration Act, of 18 U.S.C. §§ 1961-1968 and the directly related associated-in-fact enterprise pattern of racketeering acts, violations, and injuries against this class of plaintiffs.

782. Paragraphs 782 through 784 are reserved.

END OF FACTS.

[Intentionally left blank.]