

COMPLAINT

SYNOPSIS

Defendants UNITED STATES, ARMY, CIA, DOJ, FBI, Other Government Co-Conspirators Violate First Amendment Establishment Clause Which Guarantees Freedom Of Religion

1. This Complaint arises out of a fraudulently concealed pattern of religion-based cross-generational discrimination and purposeful, knowing, and willful acts, violations, and injuries against constitutional rights, perpetrated by defendant UNITED STATES and its co-conspirators, against a Quaker-based order of conscientious objectors while in military service, and in patterns of continued injuries and racketeering crimes against them and their children after their military service ended, for the illegal purpose of using these US citizens as unwitting human subjects of illegal field medical experiments without consent to develop and test an illegal weapon system, the BRMT brain hijacking bioweapon and bioweapon delivery system, which is prohibited under US law 18 U.S.C. § 178 and under the ratified 1972 Bioweapon Treaty. These acts, violations, and injuries have and do violate the Constitution's First Amendment establishment clause regarding religious freedom, violate prevailing case law regarding the balancing of religious freedom and compelling governmental interest as affirmed in *Sherbert v. Verner*, 374 U.S. 398 (1963). This religious freedom mandate was affirmed five years before Lead Plaintiff's own initial human trafficking by defendant UNITED STATES as a minor child at age 12. Congress acted again to affirm this unalienable right in the 1993 *Religious Freedom Restoration Act* 42 U.S.C. § 2000bb-1 (paragraph 259), wherein Congress restored prior prevailing case law regarding religious practices and civil rights of action to defend these sacred constitutional rights against government intrusion in the absence of a compelling governmental interest. Despite this constitutional prohibition and Congressional intent repeatedly expressed in law, defendant

UNITED STATES has and does perpetuate its discriminatory patterns of conduct, to and including systematic rights violations, and manage and operate in a sustained associated-in-fact enterprise pattern of racketeering acts against these plaintiffs by defendants DOD, CIA, and DOJ, and their respective departments and agencies, under the knowing and watchful eye of Executive Office of the President including, without limitation, the National Security Council and the Office of the Director of National Intelligence (DNI), in conspiracy with other defendants named herein, in sustained violations of, without limitation, 5 U.S.C. § 301 *Administrative Procedures*, 18 U.S.C. §§ 1961-1968 *RICO*, and 42 U.S.C. §§ 1981-1994 *Civil Rights*, 42 U.S.C. §§ 2000bb-2000bb-4, *Religious Freedom*, and our Constitution.

1A. Defendant UNITED STATES has and does act through its departments and agencies including, without limitation, defendants ARMY, CIA, FBI, and USMS, together with co-conspirators including domestic and foreign governmental police and intelligence powers, certain moneyed interests, and the press, in knowing and willful sweeping violations of the *First, Third, Fourth, Fifth, Eighth, Ninth, Thirteenth, and Fourteenth* Amendments, and other constitutional and statutory rights of this class of US persons. Religious discrimination violating the *First* Amendment, a functional cross-generational *bill of attainder* constructed by administrative fiat violating the Constitution's Section 9 prohibition, and systematic violations of *constitutional rights*, all for the corrupt purposes of developing a banned weapon system on human beings who are US citizens used as involuntary subjects and human lab rats, and of fraudulently concealing the entire corrupt associated-in-fact enterprise, are the root causes of these criminal acts. This action is brought by these plaintiffs as a civil action because:

- (i) defendant DOJ has and does refuse to act in the interests of justice despite these issues being raised repeatedly before it across decades of fraudulent concealment, willful blindness, and official silence, while it has and does
- (ii) act and fail to act, in its own continuing self-interest, rather than in the public interest it is constitutionally charged to protect, which failures to act have and do
- (iii) directly contradict the constitutional interests of all US persons, as defendant DOJ
- (iv) continues to fraudulently conceal and sustain its willful blindness to the associated-in-fact enterprise pattern of racketeering and other illegal acts, which defendant DOJ has and does both
- (v) directly operate through its police powers agencies, and against which defendant DOJ has and does
- (vi) continually fail to act, for the specific purpose of sustaining its own operations and the operations of its co-conspirators against US persons in this specific plaintiff class.

This pattern of fraudulently concealed illegal practices by defendant UNITED STATES and its governmental, private sector, and individual defendant co-conspirators has persisted for at least seventy years across four generations of American religious families of this order of Quakers, and now endangers the fifth generation of these same families, whether or not those succeeding generations continue to practice this specific religion in the same fashion as their forebears, as well as others who subjected to the same discriminatory treatment arbitrarily imposed by defendant UNITED STATES, which has and does ferociously resist the repeated efforts of Congressional through reforms of law, to root out these continuing illegal practices in defendant UNITED STATES' willful, knowing, and continuing scofflaw conduct, and that of its co-conspirators.

Criminal Law 18 U.S.C. § 175 Violated By Inhumane Medical Experiments Secretly Abusing Unwitting US Persons For Decades To Develop And Test Illegal BRMT Bioweapon And Bioweapon Delivery System

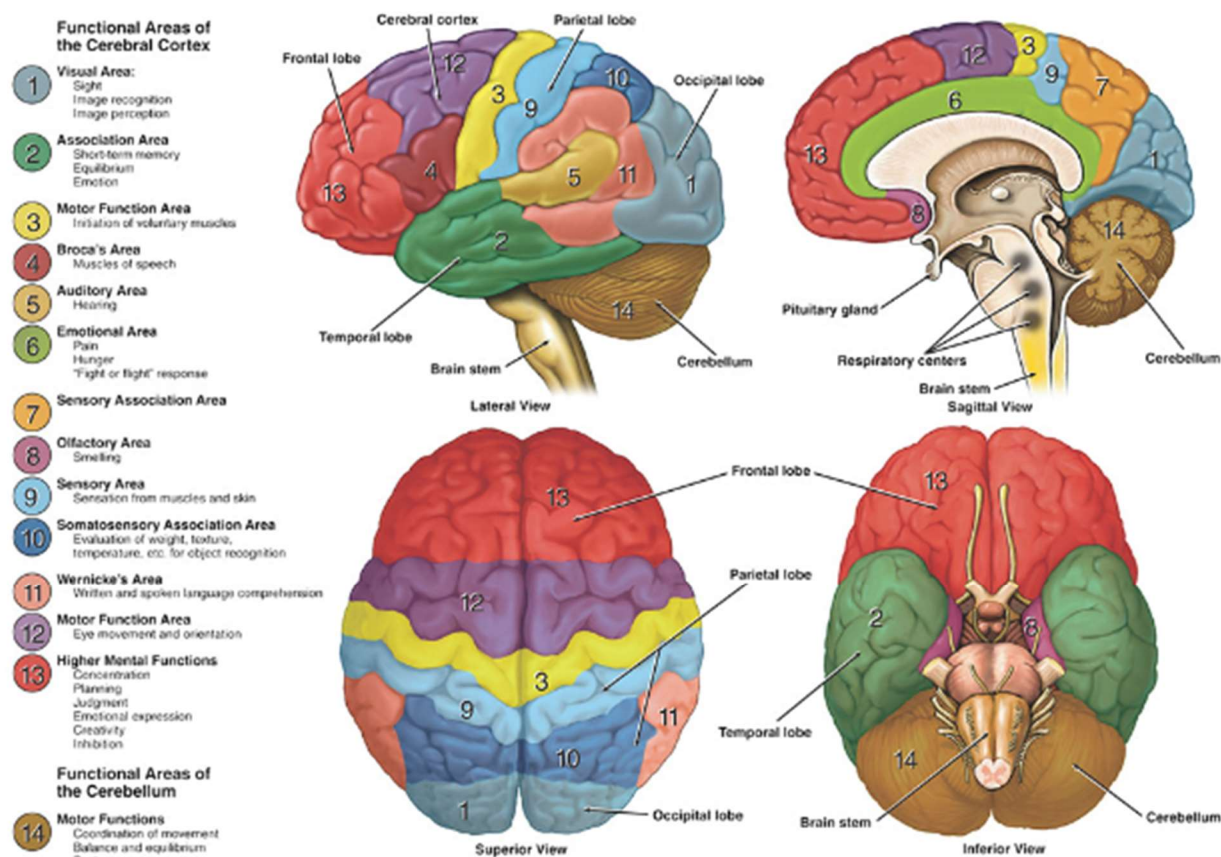
2. The original purpose of this specific conspiracy among defendant UNITED STATES' federal department and agency defendants has been and is to perpetuate the illegal development of an ultra-secret and illegal bioweapon and bioweapon delivery system (known herein as BRMT) which produces biochemicals in the brain and body which are legally defined as toxins (paragraph 253) as deployed against individual human beings, in criminal violation of 18 U.S.C. § 175, wherein Congress provided for penalties ranging to life in prison. This illegal BRMT bioweapon and bioweapon delivery system is the successor in fact to the fatally flawed and failed illegal defendant CIA MKUltra LSD secret drugging program run by Dr. Sidney Gottlieb in which defendant ARMY also closely collaborated (Interline Exhibit 3). That ultrasecret government "mind control" program ran from 1953 until its public disclosure in 1973, when it was disclosed as the American people were still reeling from the 1971 disclosure of another out of control illegal federal government program, defendant FBI's Cointelpro, wherein defendant FBI engaged in felony violations of constitutional and civil rights and in patterns of racketeering acts to and including violence against US persons. Defendant FBI also funded a White Supremacist militia against civil rights groups and other rights activists as part of its illegal Cointelpro program, described at paragraphs 332, 403-408. Lead Plaintiff's own family of origin was itself swept up in defendant FBI's Cointelpro evidence obstruction and destruction operations while his unwitting father was employed by a secret FBI cover company, Pacific Paper Products, which operated in plain sight while illegally undercutting prices offered by private US businesses in interstate commerce, so defendant FBI could use the Lead Plaintiff's unwitting father to purchase medical x-rays from specified doctors' offices and medical clinics

for recycling, thus destroying vital medical evidence of defendant FBI and co-conspirators' illegal Cointelpro violence in northern and southern California, described at paragraphs 403-418.

3. As with CIA's illegal MKUltra LSD drugging program, the illegal BRMT bioweapon development began with a few experiments which started as medical science was unlocking the biological "secrets" of human minds and bodies, primarily hormones, including, without limitation, adrenaline (energy), melatonin (sleep), and oxytocin (love). According to Harvard Health, oxytocin is a hormone that is produced in the hypothalamus and released into the bloodstream by the pituitary gland. Oxytocin is commonly known as the "love" hormone. Beginning in the 1960s, defendants CIA and ARMY abused soldiers and citizens in illegal human subject medical experiments on their hormones without their consent. As an early subject of this illegal medical experimentation, Lead Plaintiff has been its unwitting victim since about 1968. With the benefit of careful forensic analysis since 2021, it has become clear that crude initial experiments on the unwitting Lead Plaintiff were run in the tent camping area of a California State Park near Redwoods National Park by defendant ARMY and CIA personnel one evening in 1968 when Lead Plaintiff was age 12. Two white males in an adjacent tent camping spot used a secretly developed focused brain hormone hijacking (hijacking is defined as an involuntary forced takeover as used herein throughout the complaint) device from about 20 feet away, which was concealed by the hedge between the two camping spots, to drive an extreme oxytocin biochemical release from the pituitary gland in the Lead Plaintiff's brain (see Illustrations 1-3 below). At the time, Lead Plaintiff was on a camping trip in the sole custody of his unwitting father's former ARMY buddy, Gary Jack, (paragraph 417, 492), likely a continuing member of, or contractor to, defendant ARMY. Gary Jack had either been duped into this defendant ARMY and CIA operation or had infiltrated the Quaker-based religious group of Lead

Plaintiff's unwitting father. This infiltration for predatory religious discriminatory and illegal purposes has been defendant UNITED STATES' common practice against this religious group across multiple generations since at least the 1950s as further described herein.

Illustration 1: Basic Brain Structures Hijacked During Illegal Medical Experiments Used For Illegal BRMT Bioweapon Development, Testing, And Operation 18 U.S.C. § 175

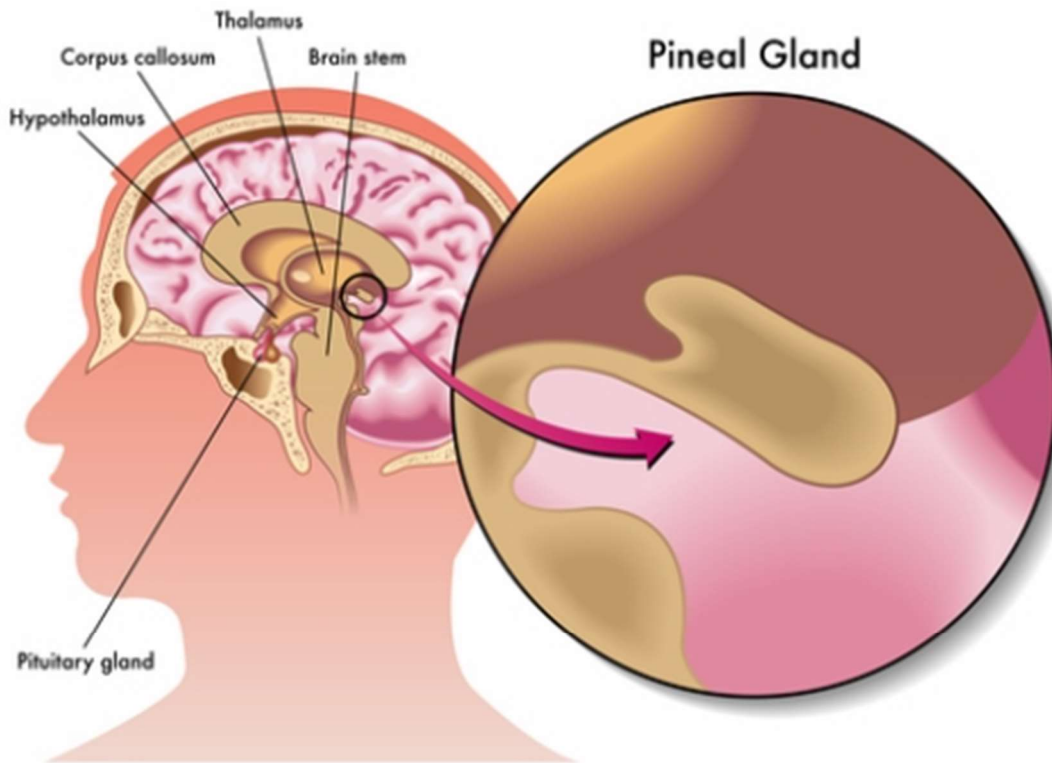


Source: Dana Foundation <https://dana.org/resources/neuroanatomy-the-basics/>

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Illustration 2: Hypothalamus, Pituitary And Pineal Glands Secrete Brain Hormones (Brain Biochemical Neurotransmitters) Hijacked By Illegal BRMT Bioweapon For Toxin Effect
18 U.S.C. § 178(2)

The Hypothalamus, Pituitary and Pineal Glands

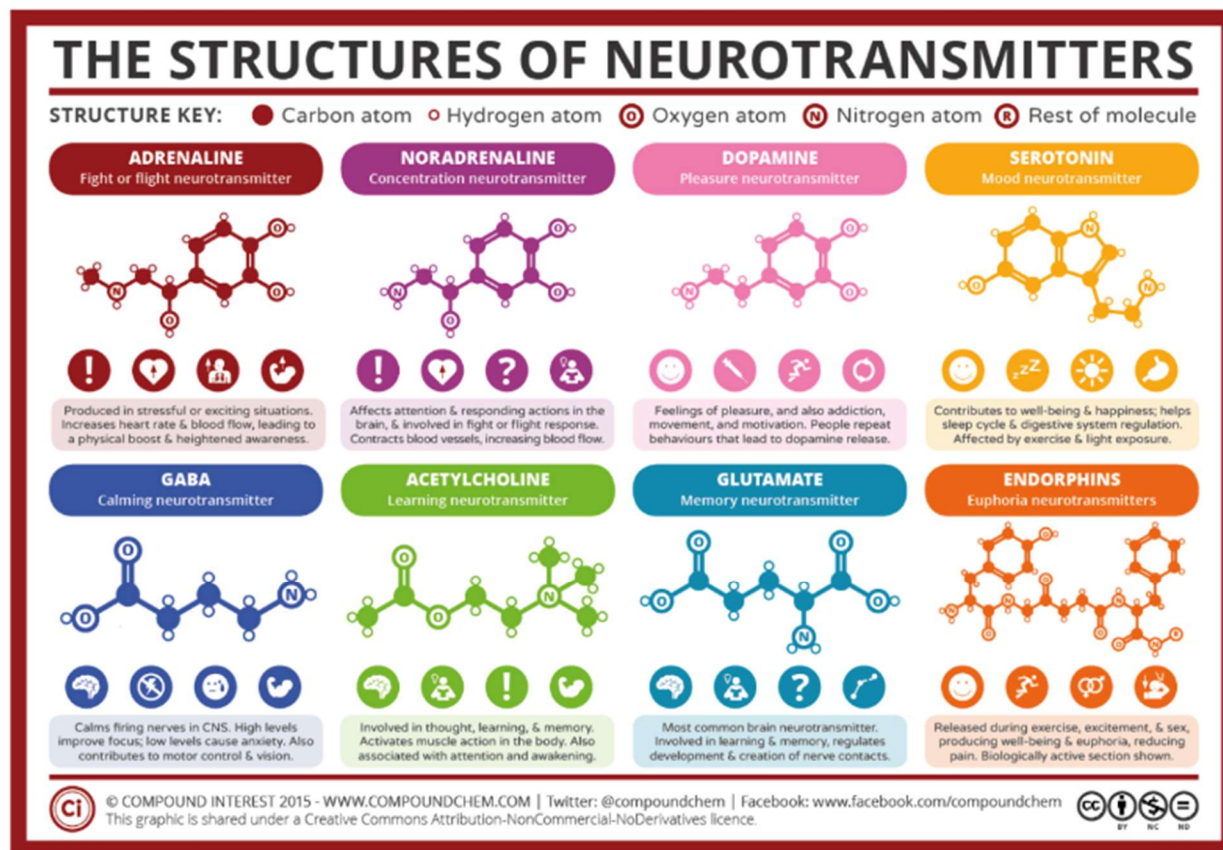


Three glands of critical importance to the body, the hypothalamus, pituitary and pineal glands, are all located in the brain.

These glands work synergistically to control many functions in the body.

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Illustration 3: Basic Brain Hormones Hijacked By Illegal BRMT Bioweapon Using Bioweapon Delivery System



Source: <https://alaughingsoul.wordpress.com/2016/01/06/the-neurotransmitters-that-rule-our-life/>

Development, Test, And Deployment Progression Of Illegal BRMT Bioweapon And Bioweapon Delivery System 18 U.S.C. § 175

4. From these crude illegal experiments on the 12 year old Lead Plaintiff and other human subjects in the 1960s, the idea for a new secret weapon gradually evolved, through medical research and technological progress, into defendant UNITED STATES' illegal and internationally prohibited BRMT bioweapon and bioweapon delivery system. Since the early 1970s, this illegal BRMT bioweapon has evolved with time, massive expenditures, medical research on the brain and body, illegal experimentation on human subjects without their knowledge and consent, and technological progress in computing, communications, and

precision location systems. Lead Plaintiff is among those directly violated and injured by defendant UNITED STATES in its long-running illegal medical experiments on human subjects without consent, which illegal biomedical abuse continues at the present time. These illegal acts, violations, and injuries by defendant UNITED STATES against these plaintiffs has progressed in ever more intrusive, sophisticated, and depraved forms over more than 57 years of continuous illegal operation:

- (i) Fired as a locally used device around Summer 1968 – in the forensically reverse engineered first known 1968 abuse against Lead Plaintiff, BRMT was fired under the supervision of BREYER, formerly ARMY Intelligence, in the California State Park at paragraph 3, then
- (ii) Fired as a locally used device around Spring 1975 - the technological equivalent of a musket, BRMT was fired under the supervision of BREYER, formerly ARMY Intelligence, at Dworshak Reservoir on a tent camping and canoe trip near Orofino, ID from Washington State University, Pullman, WA, when Lead Plaintiff was age 19, and in the company of his girlfriend Susan B. Irish (paragraph 492). then
- (iii) Fired as a remotely triggered local device around 1983-85 - the technological equivalent of remotely controlled machine gun, BRMT was suitable for use in assassinations, as was attempted at Porteau Cove, British Columbia, likely under the supervision of BURNS (CIA) when Lead Plaintiff was approximately age 30 in the company of his wife Lynne (LETHL-1, paragraph 694), then evolved further to be
- (iv) Fired as a fully remote operator controlled bioweapon and bioweapon delivery system around 2004 – the technological equivalent of remotely triggered drone weapon used for torture and to provoke self-murder (suicide ideation from extreme doses to

induce biochemically driven depression) when Lead Plaintiff was age 48, while alone at home across the street from the former BURNS residence, while Phillips lived there (likely USMS), then evolved still further since 2004 to be

- (v) Fired absent direct operator intervention in the moment – by adding daemons, speech and thought synthesis, and, more recently, likely around 2020, artificial intelligence, in a fully remote mode by unknown CIA and ARMY management who can locally through handheld or fully remote through video monitoring (paragraphs 380-394) using remotely pulsed energy to drive brain biochemical toxin effects.

5. The illegal BRMT bioweapon and bioweapon delivery system is now a highly sophisticated illegal secret offensive bioweapon and bioweapon delivery system, used against these plaintiffs without their consent in direct and continuing violations of their constitutional rights. This conduct, originating in defendants ARMY and CIA selection of unwitting victims through defendant ARMY religious discrimination against this Quaker-based group, who serve as conscientious objectors in the ARMY medical corps, was and is a constitutionally prohibited intrusion into “unalienable rights” from its first use, and was and is explicitly internationally prohibited for use against any and all persons by the ratified 1972 Bioweapons Treaty. Its offensive use as a bioweapon against an unwitting US person is also a criminal offense under 18 U.S.C. § 175 and, by making these plaintiffs involuntary servants of the United States government over decades of this abuse, also criminally violates 18 U.S.C. §§ 241, 242, 1961-1968, among other federal statutes. Defendant DOJ has been and is silent, willfully so, including the current Attorney General GARLAND, who may have been Stuart Bettsworth, a student at Lead Plaintiff’s Decatur High School in 1971-1972, and 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. GARLAND posed 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 posing first as a fraudulent church elder in Kent, WA in 1970-1972, then as father of an embedded agent posing as a student alongside GARLAND, and supposedly residing in Spokane, WA (paragraphs 99d, 111, 211, 417-419) from 1974 into 1980, all as can be attested by DOLAN, who later served as Chief of Staff to Washington Governor Gregoire (paragraph 111).

FDA Approvals For Antilog Medical Device Tests Prove Scientific Feasibility of Secret Illegal BRMT Bioweapon

6. Beneficial medical devices, using the same medical and scientific principles which undergird the illegal BRMT bioweapon and bioweapon delivery system, are only now coming to the commercial medical market. These are beneficial medical devices directly controlled by the user's brain, not by a government employee or an automated government-controlled system, and have been approved by FDA for human trials to assist disabled people who have progressive brain disabilities such as ALS. Synchron, a US company formed in 2012, spent less than \$70 million to take its device from concept to first implant in Australia in 2019 and to complete the first six US patient implants by September 2022. The Synchron system is being successfully used in human trials today as can be seen on video available at [Synchron.com](https://www.synchron.com). NeuraLink, an Elon Musk company, was FDA approved for human trials in May 2023 and completed its first human implantation in early 2024. See paragraphs 320g, 374-375, and Lead Plaintiff Evidentiary Exhibits "LPEE" pages 1-55.

Illustration 4: Synchron Brain-Computer Interface Implanted In First Six US Patients



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DIVE BRIEF

Synchron brain-computer interface implanted in first 6 US patients

The device is intended to give people with severe paralysis the ability to use their thoughts to perform everyday functions, such as online communications, hands-free.

Published Sept. 6, 2023

Source: [MedTechDive.com](https://www.medtechdive.com). See also [Synchron.com](https://www.synchron.com).

7. The legal, scientific, and technological basis for these devices to be tested on willing humans is clear. The complete absence of any legal basis for illegal human experiments on US persons to develop a weapon – the BRMT bioweapon and bioweapon delivery system - and for defendant UNITED STATES’ continuing governmental criminal abuse of US persons is also clear. There is no legal basis for illegal biomedical experiments on human subjects without informed consent. These same types of acts were criminally prosecuted against Nazi doctors, some of whom received death sentences. A life sentence is available to the courts for this criminal conduct at 18 U.S.C. § 175, demonstrating clear Congressional intent regarding the severity of these criminal acts which also violate 5 U.S.C. § 301, due to their illegal use against US persons as an offensive weapon of war. During its continued illegal development and abuse of US persons, defendant UNITED STATES has and does also violate the First Amendment, as it has suppressed access to brain-to-computer interface information from web access during research by Lead Plaintiff from 2012 to 2021, by using technical hacks to fraudulently conceal this vital evidence from discovery by Lead Plaintiff while he was actively searching for answers to explain his prior experiences with suicide ideations which occurred despite his extreme

emotional stability (320e and LPEE pages 190-236), and to explain a series of lethality attempts (paragraphs 604, 606 HEXP-1, 3; 694-710 LETHL-1-17) by defendant UNITED STATES then believed to be and made to look as if they were accidents.

Title 18 Racketeering Acts And Title 42 Civil Rights Violations Sustain Government Cover-Up

8. The illegal BRMT bioweapon and bioweapon delivery system used against Lead Plaintiff and other members of this plaintiff class of US persons violates:

- (i) the “unalienable” rights of US persons under our Constitution and its *First, Third, Fourth, Fifth, Eighth, Ninth, Thirteenth, and Fourteenth* Amendments,
- (ii) the ratified 1972 *Bioweapons Treaty* internationally effective in force March 1975,
- (iii) 18 U.S.C. § 175, Prohibitions with respect to biological weapons,
 - a. “175(c) Definition.— For purposes of this section, the term “for use as a weapon” includes the development, production, transfer, acquisition, retention, or possession of any biological agent, toxin, or delivery system for other than prophylactic, protective, bona fide research, or other peaceful purposes.”
- (iii) numerous other federal and state statutes (paragraph 251), and,
- (iv) as used in known abuses of plaintiffs, other ratified international treaties having force of law (paragraph 251).

Defendant CIA Murder of ARMY Contract Biomedical Researcher Frank Olson

9. Defendant UNITED STATES has and does employ extreme methods to cover up and sustain its illegal operations. In 1953, as defendant CIA’s illegal LSD drug dealing program MKUltra was being kicked off, Frank Olsen, a contract researcher, raised legal and ethical objections to the program plan. He was secretly dosed with LSD later in that same November 19, 1953 meeting, and died five days later on a New York City sidewalk, after his semi-conscious

body came through an upper floor hotel room window around 100 feet above the sidewalk, which he had been sharing with the MKUltra program assistant director, at around 2AM on November 28, 1953. There was no criminal prosecution. In 1975. President Ford and CIA Director Colby apologized to the Olsen family for his death.



Source: Wikipedia https://en.wikipedia.org/wiki/Frank_Olson

To sustain illegal BRMT bioweapon and bioweapon delivery system program secrecy, maintain involuntary servitude, and perpetuate the fraudulent concealment and cover up of defendants CIA and ARMY's illegal human subject medical abuse of the Lead Plaintiff and other members of the class, defendant DOJ (including its various police powers agencies) has and does also directly manage these unwitting human subjects as its involuntary servants in its own illegal programs of domestic spying and surveillance on US persons, foreign nations, and foreign nationals. As it did in defendant FBI's violent Cointelpro program from the 1950s into the 1970s for which there were no criminal prosecutions, defendant DOJ has and does use defendant FBI, USMS, and other federal police powers agencies to conduct durable patterns of rights violations and associated-in-fact enterprise patterns of racketeering acts in conspiracy with other defendants, against these plaintiffs. Over time, an increasing number of domestic police powers

departments and agencies have been entangled in these illegal operations against rights and in associated-in-fact enterprise patterns of racketeering acts, as have foreign intelligence services and police powers in allied countries, along with members of the press, media, and entertainment industry, and certain members of the public. This overall program of illegal BRMT, rights, and racketeering conspiracy violates Title 5 administrative procedures, Title 18 criminal statutes, and Title 42 civil rights statutes of the United States Code and common law. The myriad federal constitutional, ratified treaty and statutory violations are summarized at paragraph 251 and, together with state law violations, are specifically enumerated at each relevant claim in Claims for Relief paragraphs 801 through 854.

**Homicidal Conduct Against Lead Plaintiff's Extended Family Matches Other
BRMT Indirect Perpetrator Pattern Evidence**

10. The illegal BRMT bioweapon and bioweapon delivery system quite probably played the critical role in the homicidal death of at least one member of Lead Plaintiff's extended family, Audrey Brewer, 18, on September 6, 2011 (Interline Exhibit 1 below) around 1:15AM (4:15AM Eastern time), as described in great detail at paragraphs 803 and 805.

[Intentionally left blank.]

Interline Exhibit 1: Probable September 2011 Illegal BRMT Bioweapon Brain Hijacking Homicide

Union-Bulletin

WALLA WALLA - Angela Effinger was sentenced this morning to 10 years and three months in prison for murdering a woman during a fight in September in the vicinity of the former Blue Mountain Mall. Effinger, 30, looked straight ahead and nodded in understanding when the sentence was imposed by **Superior Court Judge John Lohrmann** following a half-hour hearing. She was led from the courtroom at the County Courthouse a short time later.

Effinger pleaded guilty April 12 to second-degree murder in the stabbing death of 18-year-old Audrey Brewer, who had started a relationship with Effinger's former boyfriend, Andrae Jackson.

.....

Before the sentence was imposed, Effinger tearfully said, "I didn't mean to hurt (Brewer)." Effinger's attorney, Jim Barrett, read a statement she prepared in which she acknowledged taking Brewer's life, expressed remorse for choosing to drink heavily and then fight with Brewer, and prayed for forgiveness.

Effinger's statement also included claims that her years with Jackson were filled with physical and emotional abuse. Barrett said Jackson - who attended the fight between Effinger and Brewer - had instigated it, therefore Barrett asked for an exceptionally low prison term of five or six years for his client.

Lohrmann declined to depart from the standard range of 10 years and three months to 18 years and four months. **But he said there is a strong indication Effinger was acting unlike herself when she killed Brewer.**

While calling the crime horrendous, Lohrmann pointed out that Effinger has no criminal history whatsoever, was in a difficult mental state as the result of an abusive relationship with Jackson and "something snapped."

"She certainly was greatly manipulated," Lohrmann said.

Source: Partial excerpt of news article from Walla Walla Union Bulletin, July 2, 2012. Full text of news article at LPEE65-1 (emphasis added, see note at paragraph 230 to locate original document in evidence).

On this specific September 6, 2011 date, Acting CIA Director Morrell was replaced by the incoming Senate confirmed CIA Director Petraeus, creating a moment of organizational ambiguity which could be exploited by the agency and/or program managers to conceal this criminal act from internal notice and accountability. Petraeus would later resign on November 9, 2012 after disclosure of his sharing of classified information during an adulterous relationship. This biographical similarity of conflicted romance and classified program information in

common between these two separate sets of events comprises an intelligence community tradecraft rhyme for a criminal psychopath, used to act out (see discussion of criminal psychopathy at paragraph 820O-Q) in a criminal field test of the illegal BRMT bioweapon and bioweapon delivery system tools of violence on Angela and Audrey over the months leading to the murder and through the murder itself. These common story lines would have been known to the agency perpetrators at the time this assassination field test crime was conceived in the intervening months between the April 28, 2011 nomination, the June 30 confirmation, and the September 6, 2011 assumption of duties. See the knife as a weapon illegal BRMT mental manipulations hijacking of Lead Plaintiff at paragraph 805BH, beginning in April 2011, five months before Audrey's murder in September 2011. Without making an accusation, it is also notable that acting director Morrell, from July 1, 2011 to September 6, 2011, bears a strong facial resemblance, according to his Wikipedia biography picture, to Lead Plaintiff's uncle Bruce in Walla Walla, WA. Recall that similar violent acts have occurred without any criminal investigation or other action being taken by defendant DOJ including, without limitation, in (i) the 1953 murder of Frank Olson as the illegal defendant CIA MKUltra program got underway (paragraphs 359-363), itself the predecessor program to this illegal BRMT bioweapon and bioweapon delivery system program, (ii) in the overall illegal MKUltra LSD drugging program from 1953 to 1973, and (iii) for the obstruction of justice MKUltra program evidence destruction ordered by CIA Director Helms, all of which resulted in zero criminal prosecutions against any defendant CIA personnel ever (paragraphs 9, 61, 308, 332, 801F, 805T). Both the victim's estate and the supposed perpetrator, if acted upon remotely and/or locally using the illegal BRMT bioweapon and bioweapon delivery system, are plausible members of this class of injured

plaintiffs, as more fully explained through the technical analysis of the illegal BRMT bioweapon and bioweapon delivery system at paragraphs 359-399.

11. While the Lead Plaintiff is not a forensic psychiatrist, he notes the strong symbolism across this murder and other multiple events perpetrated by defendants over time, including:

- (i) the above mentioned September 6, 2011 murder date which incorporated illegal BRMT bioweapon and bioweapon delivery system brain hijacking tools of violence (paragraphs 803, 805),
- (ii) the September 2007 attempted inculcation of Lead Plaintiff into a totally specious terror investigation, which included his repeat human trafficking to London (paragraph 465, 519, 599D(i)(e), 601C-F, 603C) which was related to pattern 2007-2008 fraudulent employment at defendant ESTABLISH by defendant ROSENBERG (FBI) in northern New Jersey (paragraphs 99e, 165, 166, 213, 320c, 320f(v), 416, 425-436, 462-471(i), 471(v), 472, 474, 482, 503, 518-519, 521, 536, 557, 599D(i)(e), 603, 611, 634A, C, 641, 650D, 656D),
- (iii) September 11, 2022 lethality attempt on Lead Plaintiff and others in a mass casualty event documented at Interline Exhibit 15B,
- (iv) September 11, 2001 attack in reprisal for prior invasion of sovereignty operations in the Middle East by defendant UNITED STATES as related at paragraph 610 HEXP-7.

12. This particular forensic observation, inculcating the illegal BRMT bioweapon and bioweapon delivery system in this specific murder, was made in January 2024. It is strongly circumstantial, based upon specific understandings of (i) comparable patterns of typical US intelligence tradecraft, (ii) forensic analysis of comparable patterns documented in publicly available sources including Congressional reports and press reports, and (iii) known aspects of

the life experiences of close family members and extended family members and friends. These patterns of comparable life circumstances and adverse experiences have repeatedly occurred across many decades to Lead Plaintiff and across extended family members own life experiences.

13. The Lead Plaintiff notes his attention has repeatedly been drawn by illegal BRMT bioweapon and bioweapon delivery system brain hijacking to the time 9:11 over many years, even in the midst of other critical tasks when there would be no reason to want to know the time in that moment. An obsessed remote operator or computer daemon (an automated scheduler of an event in computer software) can orchestrate this specific pattern of notice by an illegal BRMT command delivered to the brain in that moment.

14. This pattern of conduct is worthy of close examination at trial by a criminal forensic psychiatrist or psychologist expert witness. The conduct echoes known conduct, as investigated by defendant FBI of predatory OB/GYN criminal conduct against trusting and vulnerable victims in the Dr. Larry Nassar case at Michigan State University, in its badly flawed and negligent investigative conduct, which resulted in additional crimes by the perpetrator for several years after initial reports. Comparable assaults on other trusting and vulnerable victims by Dr. Robert Hadden at Columbia University went uninvestigated for many years until reported by the wife of a US presidential candidate. Defendant BURNS, cited herein both in official capacity and individually, ostensibly practiced as an OB/GYN in Kirkland, WA into the 1990s when he lived across the street from Lead Plaintiff's second spouse Jeanette, which BURNS orchestrated into Lead Plaintiff's life for that fraudulent coerced relationship and marital community, as described in paragraphs 609-610 HEXP-6, 7.

15. The Quaker spin-off religious community which Lead Plaintiff grew up in and which many members of his extended family and thousands of others still practice today, is a very tight knit high trust community, so it is particularly vulnerable to these forms of surreptitious neurotic, predatory, and psychopathic conduct, as these types of events are extremely uncommon among the members of this community. When combined with a novel bioweapon which can hijack brain functions and which is outside of all known human experience, this high trust religious community provides a perfect target group of vulnerable people for these types of criminal exploitations.

Individual Defendant Identifications In 2023-24 Confirm Government Defendants Are Key Perpetrators

16. These patterns have emerged gradually but persistently to Lead Plaintiff, as they were observed in fact and in their extremely adverse effects over the course of decades, but the root causes and the identities of the surreptitious perpetrators were elusive and not understood. These defendants' fraudulent concealment of their malign purpose by their abuse of state secret privilege, and fraudulent concealment of the specific actual identities of the corrupt defendants operating under multiple names and covers at various times and places as identified to date, has emerged only very gradually since mid-2021 through (i) diligent forensic analysis of known events and fact patterns, (ii) research into the progress of science, medicine, and technology across recent decades, specific identification first known to Lead Plaintiff in mid-2022 (ARPAIO) and others from September 2023.

17. Specific defendant culpability has become extremely clear and convincing in the past few months with the specific individual identifications between September 2023 and April 2024 which provide explicit definitive links to the particular institutional defendants named herein (paragraph 99, LPEE pages 12251-12261). These identifications have crystalized the elements of

this complaint. These patterns of malign and illegal conduct echo nearly identical patterns of practice which the Senate Intelligence Committee (1975 – FBI and CIA, 2014 CIA) and Rockefeller Commission (1977 CIA) have directly connected to illegal institutional conduct of federal police powers and intelligence agencies, including defendants FBI, CIA, and ARMY. Comparable patterns experienced by Lead Plaintiff are directly compared to those documented patterns at LPEE pages 237-311. The original 1975 Senate Intelligence Committee and 1977 Rockefeller Commission reports are at LPEE pages 6885-7466. The 2014 Senate Intelligence Committee findings are at paragraph 340.

**Defendants ARMY, CIA, DOJ Fraudulently Conceal Criminal Conduct Behind
Illegal Abuse Of State Secrets Privilege 5 U.S.C. § 301**

18. This pattern of illegal BRMT bioweapon and bioweapon delivery system, constitutional rights, and associated-in-fact enterprise pattern racketeering conspiracy, including acts, violations, and injuries, were originated against this specific plaintiff bgroup of Quaker spin-off religious plaintiffs in the 1950s by defendant ARMY (initially through the ARMY Bioweapons Lab and Medical Corps) religious discrimination against conscientious objectors in military service. The state secret privilege is a privilege – it cannot legally be used in color of law abuse and systematic failure to comply and enforce law by defendant UNITED STATES and its co-conspirators to subsume individual rights under our Constitution. It is subject to constraints under law and case law as described at paragraphs 254-266.

**Sustained Pattern of Third Amendment and Posse Comitatus Law Violations By
Defendants ARMY And DOD 18 U.S.C. § 1385**

19. The following Third Amendment rights violations and posse comitatus violations have been perpetrated by defendants DOD, ARMY, DARPA, and other unknown military departments and agencies directly against the Lead Plaintiff over many decades, and most probably against other members of this class of plaintiffs:

- (i) Gary Jack – who human trafficked Lead Plaintiff in 1968 as a 12 year old child, while posing as father’s buddy, from defendant ARMY
- (ii) Stephen BREYER – former defendant ARMY Intelligence, who posed as Quaker religion spin-off sect home church elder Snow in 1970-1972, then as Jack Sackville-West from 1974 into the 1980s, during these continuing violations against Lead Plaintiff and other members of this class.
- (iii) Warren Wilkins – Lt. Colonel, then Colonel, Washington Army National Guard, while at LazerSoft which employed Lead Plaintiff in 1986-1989.
- (iv) Jeanette (Yarbrough/Hansen/Smith/Brewer/Austin) – fraudulently orchestrated to become Lead Plaintiff’s second spouse, while a national security deliberately compromised bisexual enlisted military soldier, who was conditioned into a Mideast intelligence assignment (defendant ARMY) which is indicated by her belly dancing skill and costumes, and by tradecraft comments in her presence by HADJINIAN (paragraphs 457, 460, 499). Jeanette was threatened with criminal prosecution at some point to coerce her into matching with Lead Plaintiff as arranged by defendants BURNS and WATERS, then followed orders to pair up and then separate on multiple occasions over the 17 year fraudulently coerced relationship with Lead Plaintiff from 1988 to 2005 (paragraph 610 HEXP-7) orchestrated primarily by defendants BURNS and WATERS.
- (v) Lloyd AUSTIN – while at defendant ARMY, assigned as a project manager at CNA Industrial Engineering for approximately six months during the HomeGrocer distribution warehouse project series, as defendant ARMY active duty officers Alexander and Yvgeny VINDMAN were continuing their pose as extended family members of Lead

Plaintiff's fraudulently placed spouse Jeanette who occupied the same residence as Lead Plaintiff in civilian dress only, with no representation of any military service at any time.

(vi) Alexander and Yvgeney VINDMAN – defendant ARMY, who posed as extended family members of Lead Plaintiff's fraudulently placed spouse Jeanette from the early 1990s into 2004.

Defendant CIA's Illegal BRMT Bioweapons Program Executives Identified In 2023-24 – Stephen Breyer, Harold Hopper, William Burns, Anthony Fauci

20. A series of program executives have perpetrated the illegal BRMT bioweapon and bioweapon delivery system program as it has evolved from (i) the 1960s crude brain hormone hijackings used in assassination attempts and local manipulations of behavior and free will through (ii) remotely triggered brain hormone hijackings used to evoke love affairs (extreme oxytocin - love) to homicides (extreme melatonin – sleep or adrenaline – fight or flight) using locally embedded devices in the 1980s (such as cell phone equipment boxes in vehicles) which evolved toward (iii) a more rigorously science-based device using neuroscience, computer, low latency communications technology in the 1990s, which (iv) technological progression accelerated dramatically after the 9/11 attack using the massive increase in national security funding to vastly expand the scope and pace of illegal BRMT bioweapon and bioweapon delivery system funding and research to facilitate (v) highly sophisticated, neurologically tunable (ranging from subtle to extreme) thoughts and feelings free will hijackings (brain hormone external stimulations) using a fully remote hyper-precision location pulsed nanometer bioweapon deployed on its space-based constellation of geosynchronous satellite platforms for use anywhere on earth in the present era.

21. These known and identified illegal BRMT program executives, as forensically identified by Lead Plaintiff during September 2023 through February 2024, and who can be cross-identified by known high-veracity witnesses at trail are:

- (i) Stephen BREYER (through his initial ARMY intelligence role and subsequent government employment), as a religious intruder interposed in the family religion for the purpose of managing the 1970-1972 trauma period inflicted upon the Lead Plaintiff's family of origin in the 1970 birth/homicide/death traumas sequence, posing as home-based church elder Snow when Lead Plaintiff's family was surreptitiously trafficked from their long familiar Maple Valley, WA area home church congregation to the fraudulent Kent, WA area Snow home church congregation for close observation, brain hormone hijackings, and coercive psychological manipulations before being moved again around 1972 to another Midway, WA home congregation, then disbanding the fraudulent home church he ran in Kent, WA to facilitate BREYER's relocation. BREYER then reappeared as Jack Sackville-West in 1974, presiding patriarch of that Spokane faked family who had befriended Lead Plaintiff at Washington State University, Pullman, WA, while also most probably overseeing on-going illegal BRMT brain hijacking experiments on Lead Plaintiff's uncle and family in Walla Walla, WA then in the Tri-Cities area of Washington state (site of the national security Hanford Nuclear Reservation) in the 1970s into the 1980s.
- (ii) Harold Hopper, as Lead Plaintiff's employer at Deloitte Seattle from 1980-1986 as he worked in involuntary servitude on illegal investigations, was trafficked to work with embedded defendants CIA BANNON, STONE, BLAIR, THORPE, and defendant FBI's WEISSMAN and ROSENBERG, survived a double homicide attempt (paragraph 694

LETHL-1) and various entrapment attempts, worked unwittingly in defendant UNITED STATES' illegal surveillance and spying operations, and met and married his first spouse, Lynne, whose marriage to Lead Plaintiff was destroyed using oxytocin by the next program manager, BURNS, below.

- (iii) Williams BURNS (CIA) known as Dr J. Patrick Heffron OB/.GYN. practicing in Kirkland, WA, where Lead Plaintiff lived with and then married first spouse Lynne in the 1980s, and who was BRMT hijacked to a wrecked marriage and loss of property in 1987-1988 (paragraph 609 HEXP-6), then BRMT hijacked into a fraudulent 1990 marriage to Jeanette (paragraph 610 HEXP-7) who lived across the street from the apparent BURNS residence, while BURNS presided over this illegal BRMT sequence in the latter 1980s into the 1990s.
- (iv) Anthony FAUCI (Director of NIAID) known as Larry R Cook, operated in a program executive role from the mid-1990s into the 2000s (paragraph 602 NSEC-3) which used illegal BRMT brain hijackings to and including extreme mental biochemical torture and coercive psychological operations, which led to suicide ideations by the early 2000s in the aftermath of the 9/11/2001, during a period when documented torture was being practiced in defendant CIA operations and surreptitiously used by FAUCI against Lead Plaintiff.
- (v) Subsequent program executives directing the illegal BRMT bioweapon and bioweapon delivery system are unknown as there is no longer a need for program personnel to appear locally in field operations. Illegal BRMT bioweapon and bioweapon delivery system operations are fully remote using (a) remote video feeds for completely remote operations and/or (b) using encrypted cell phone style devices and applications to

support field operations in proximity to the victim being hijacked. Defendants DOJ, FBI, USMS have and continue to conduct illegal associated-in-fact enterprise patterns of racketeering acts to sustain involuntary servitude using, among other illegal acts, financial frauds against Lead Plaintiff individually and against his businesses, and by using surreptitious employment/unemployment control and other illegal acts. Defendant FBI human trafficker defendant ROSENBERG coordinated and directly participated in the 2005-2010 human trafficking sequence, which then added physical torture in Boston, MA and still more forms of physical torture in Cliffside Park, NJ, to the previously conducted mental torture and coercive psychological operations (2002-2005), which led to the 2010-2011 forced dismissal under duress of Lead Plaintiff's federal civil rights litigation while kidnapped into and confined by defendants as a psychiatric patient at a Bergen County, NJ hospital (a scenario which is identical in form to those used in the former Soviet Union against targeted persons). Since that time, and into the present, defendants have and do continue illegal acts including, without limitation, violations of rights, law, and regulations, human trafficking, patterns of racketeering acts, entrapment attempts, lethality attempts, and programmed medical maladies, as related in this complaint.

Defendants DOJ, FBI, USMS, And Other Illegal BRMT Bioweapons Program, Rights, And Racketeering Acts Defendants Identified In 2023-24

22. These malign patterns of the illegal BRMT, rights, and racketeering conspiracy, including acts, violations, and injuries, have been repeatedly experienced by Lead Plaintiff, have occurred in Lead Plaintiff's uncle's family (below), have been experienced by other members of his family of origin, extended family, by marital community members, by other members of this Quaker spin-off religious order, as well as by close friends and relations of Lead Plaintiff. These

acts have been perpetrated by various defendant police powers departments and agencies at all levels of government, by certain members of the press, media, and entertainment who operated without properly identifying themselves and who participated directly in specific acts, violations, and injuries, and are therefore defendants, and by other entity and individual defendants in their associated-in-fact enterprise patterns of rights and racketeering acts, violations, and injuries.

23. This discriminatory pattern has and does also target other groups based upon their gender, sexual orientation, race, and/or political viewpoint, and now extends well beyond this specific Quaker spin-off religious group. These plaintiff victims are also included by joinder in the class of plaintiffs herein, all in defendants' systematic violations of Constitution, rights, and law, as described in the specific claims in this complaint.

24. This entire class of plaintiffs have been purposefully and systematically pretexted and entangled by defendant UNITED STATES, specifically including defendants ARMY, CIA, FBI and USMS, in national security matters to fraudulently conceal the illegal BRMT bioweapon and bioweapon delivery system program's existence, and to evade legal consequences by fraudulently claiming "state secrets" privilege which is invalid under federal law 5 U.S.C. § 301 Administrative Procedures (paragraphs 260-262, Interline Exhibit 2) and *United States v. Reynolds*, 345 U.S. 1 (1953), as discussed below at paragraphs 255-266. The primary purpose of these deliberate pretexting and entanglements in national security matters of these innocent unwitting US persons has been and is to disguise continuing illegal operations by defendant UNITED STATES, specifically including, without limitation:

- (i) to conceive, conduct initial experiments, and then perpetuate illegal development of the successive generations of the internationally prohibited bioweapon and bioweapon delivery system, known herein as BRMT, through defendant UNITED STATES' illegal

pattern of direct human medical experimentation on unwitting human subjects, and coercion through psychological manipulations and racketeering crimes in field operations against those plaintiffs,

(ii) to conceal defendants' sustained illegal abridgements of constitutional, civil, and human rights of US persons by police powers, intelligence, and by military personnel and operations while they have been concealed in civilian dress, and

(iii) to conceal and perpetuate defendants' obstruction of justice operations including, without limitation, those conducted for the purposes of (a) discrediting and tampering with witnesses, and (b) destroying evidence of criminal conduct against rights and property interests by defendants FBI, USMS, CIA, and ARMY, and by other federal departments and agencies' police powers, intelligence, and military operations illegally conducted by their officers, agents, employees, informants, and other co-conspirators.

Fraudulent Concealment, Willful Blindness, And Official Silence From Defendants DOJ, CIA, ARMY, National Archives

25. To fraudulently conceal this illegal bioweapon and bioweapon delivery system from public and legal scrutiny, defendant UNITED STATES has and does extend these same patterns of illegal BRMT, rights, and racketeering conspiracy, including acts, violations, and injuries which were already in well-practiced use by defendant UNITED STATES' CIA, ARMY in MKUltra, by FBI in Cointelpro, by USMS (assigned the role of principal day to day handler of these plaintiffs' living environments and cover operations employment), and by their co-conspirators including, without limitation police powers operations in WA, MA, NJ, NY, all while these unwitting and unknowing involuntary servitude plaintiff victims have been and are illegally used in human medical experiments conducted in field conditions without consent by defendant UNITED STATES and its co-conspirator defendants. Government defendants'

continued conduct speaks loudly of their intent to fraudulently conceal these facts from these plaintiffs and from the general public:

- (i) Defendant DOJ has turned a blind eye and will not even acknowledge and does not respond to complaints and inquiries in any way. Despite literally dozens of repeated pleas, defendant DOJ has and does refuse to address these criminal violations (paragraph 550-583, Interline exhibits 15E, 18, 19, and LPEE pages 368-793, LPEEV65-11 through 16, Appendix 2 paragraphs 1-040 through 1-042, 1-046 through 1-055, 1-057, 1-059, 1-063, 1-067), and is inextricably inculpated through its own acts and failures to act as described herein.
- (ii) Defendant DOJ's agency FBI engaged with defendant NYPD in a flawed and clearly coordinated cover-up in September 2021 (Interline Exhibits 17-19).
- (iii) National Park Service letterhead was used to lie in reply to a FOIA request (thereby violating 5 U.S.C. § 552) about the August 2021 ML King DC voting rights rally location, after the Lead Plaintiff was deliberately misdirected at considerable taxpayer expense with a crowd of police powers volunteers, from this rally in August 2021, and defendant UNITED STATES also technically hacked the New York Times website feed the following day to suppress all delivery of news reports and photographs of that and other voting rights rallies nationwide to Lead Plaintiff,
- (iv) Defendants ARMY, CIA, and NARA have and do refuse to even acknowledge FOIA and Privacy Act requests, which have and do continue to go completely unacknowledged by all other departments and agencies of defendant UNITED STATES since 2021 for more than two years by these defendants, and to go unanswered by other federal departments and agencies, all of whom have and do violate 5 U.S.C. § 552 (LPEE pages 508-541). US

Mail has been and is suppressed and not delivered to GARLAND, Jack Smith, and Robert Hur, all with official positions at defendant DOJ. Jack Smith is plausibly inculcated in the illegal BRMT operations under BREYER in the 1970s, while known as James (“Jim” and “Jimbo”) Sackville-West, the youngest member of the Sackville-West family in Spokane, WA, then headed by BREYER (paragraphs 21(i), 111, 211).

- (v) Illegal abuse of the “state secrets” privilege has been and is used to fraudulently conceal and cover up the entire matter for all these decades of criminal abuse of these plaintiffs by defendant UNITED STATES (paragraphs 32, 255-271, 314-321, 550-583).

26. There are no less than three fundamental legal reasons the claims of this class of plaintiffs are continuously valid from the inception of the BRMT, rights, and racketeering conspiracy of acts, violations, and injuries to the present:

- a) This illegal BRMT and racketeering program has continuously operated in secret while it has violated rights and law, so it is not eligible for the safe harbor of “state secrets” privilege under the Supreme Court mandate *United States v. Reynolds* 345 U. S. 1 (1953) (paragraph 260), which requires all such programs to be “not inconsistent with law,” at Footnote 4, citing per 5 U.S.C. § 22, and which was subsequently replaced by 5 U.S.C. § 301 when the U.S. Code was reorganized (see the inline exhibit in paragraph 260).

- b) This illegal BRMT, rights, and racketeering conspiracy has been fraudulently concealed from inception, and was not uncovered until September 2023 to sufficient extent to definitively identify the original perpetrator defendant UNITED STATES federal departments and agencies identified herein. This discovery has been made by the diligent efforts of a victim, Lead Plaintiff, not by defendants’ voluntary disclosure ever,

as these defendants have remained utterly silent except to tell official lies (Interline Exhibits 16-18, LPEE pages 508-541). Fraudulent concealment invokes equitable tolling under hundreds of years of common law and under the mandate of *Rotella v. Wood*, 528 U.S. 549 (2000) (paragraphs 315-317), so the entire sequence of illegal BRMT, rights, and racketeering conspiracy, including acts, violations, and injuries which have been continuous from program inception and from first injury to these plaintiffs, is subject to this Court's scrutiny and jurisdiction under law.

c) This illegal conspiracy of BRMT, rights, and racketeering conspiracy including acts, violations, and injuries has continuously violated the RICO statute of 1970, as 18 U.S.C. §§ 1961-1968 requires only two acts and that the most recent such racketeering act be no more than ten years from a prior offense (18 U.S.C. § 1961(5)) to establish a pattern of racketeering acts – there are thousands of such racketeering acts, as defined in section 1961(1), described herein as to Lead Plaintiff alone. The illegal BRMT, rights, and racketeering conspiracy has involved continuous criminal violations of at least two specific pattern of racketeering acts, (i) 18 U.S.C. 1584 Involuntary Servitude from its inception, and (ii) 18 U.S.C. § 175 Bioweapons, which was adopted into law in 1990. The illegal BRMT bioweapon and bioweapon delivery system was already prohibited from use by defendant UNITED STATES effective March 26, 1975 under the ratified 1972 *Bioweapons Treaty* (paragraphs 322-324), both of which violations always were prohibited from use on a US person by our Constitution from the moment of illegal first use on any human subject without consent.

27. Under US law and the common law principle of equitable tolling invoked by fraudulent concealment, which lies beneath the thoroughly discredited and illegal application of

the “state secrets” privilege to conceal this illegal program which acts directly against the “unalienable” rights of US persons, the claims herein extend continuously from at least the forensically established 1968 first known use against the Lead Plaintiff of the bioweapon to the present time. Certain other plaintiffs may be entitled to relief extending to as early as the 1950s, as the date on which the first secret local illegal BRMT bioweapon styled device was used in illegal brain hormone hijacking experiments against them without consent, is currently unknown to these plaintiffs.

28. The illegal BRMT bioweapon and bioweapon delivery system is still in use to this day against these plaintiffs. Associated-in-fact enterprise pattern of racketeering acts and constitutional rights violations also continue into the present time, as evidenced by the 2010 kidnapping, the 2018 human trafficking, and the entrapment attempts against the Lead Plaintiff related in paragraphs 606, 607 HEXP-3,4; 643, 648, RICO-5, 10; 808-811. The Constitution does not functionally exist for these plaintiffs. These plaintiffs have no “unalienable” rights, and their selection for victimization resulted from religious discrimination, not from any legally permitted or constitutional process whatsoever. Defendants’ pretexting and follow-on acts, violations, and injuries against them are the direct, foreseeable, willful, knowing, and repeated results of defendant UNITED STATES executive branch caprice and unlawful religious and other discrimination disguised in the fraudulent dress of “state secrets,” and in the acts and neglect to prevent of these defendants in systematic violations of the Constitution and laws summarized at paragraph 251.

29. Defendant DOJ continues to sustain its fraudulent concealment, willful blindness, and official silence despite numerous entreaties and petitions in accordance with the First Amendment right. This directly benefits three currently serving presidential cabinet secretaries

(BURNS, GARLAND, AUSTIN) and the numerous federal, state local governmental and individual defendants named herein. These plaintiffs have no other recourse than to bring to this Court this litigation as a civil matter for remedies against unconstitutional and criminal conduct by these defendants. Plaintiffs have constitutional rights and legal rights, under law and ratified treaty, of due process and redress for grievous injustices, acts, violations, and injuries imposed by these governments, each and all of whom were allegedly formed “to secure these rights” of the People, to be secure from the tyranny and oppressions of an imperious and arbitrary king, as stated in our Declaration of Independence,

30. Either “state secret” privilege cannot fraudulently conceal a criminal racket to constitutionally triumph over unalienable rights – or else we have no rights but the “right of government” to its own arbitrary determination for its own corrupt purposes to subjugate and sustain involuntary servitude for its own convenience whomever it chooses. Under our Constitution and under law 5 U.S.C. § 301, government can neither pursue and nor perpetuate these illegal purposes. Despite these constitutional and legal structures, under the durably and willfully blind eye of defendant DOJ since at least the 1950s, defendant UNITED STATES and its institutional and individual co-conspirators have and do continue to engage in illegal conduct in pursuit of lethal outcomes, paragraphs 694-710 LETHL-1 through 17, and through torture which has and does invoke suicide ideations at paragraphs 604-607 HEXP-1-4. The forms of torture imposed by defendant UNITED STATES (defendant CIA, as corroborated by the Senate Intelligence Committee at paragraph 340, and conducted without consent under defendant NIAID management by defendant FAUCI) have and do include coercive psychological, brain biochemical, and remotely imposed physical torture and combinations thereof, each imposed in field conditions on the Lead Plaintiff (paragraphs 604-607 HEXP-1-4), and most probably on

other unwitting human subjects, all of which torturous practices have extremely detrimental effects:

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.

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See the full text of the American Medical Association scholarly analysis above at LPEEV65-17.

The timeline below summarizes the scope and duration of these acts, violations, and injuries - against the Lead Plaintiff only, as representative of the class of plaintiffs.

ILLEGAL CONSTITUTIONAL RIGHTS AND RACKETEERING PATTERN ACTS, VIOLATIONS, AND INJURIES (Timeframes Are Approximate)											
1960	1970	1975	1980	1985	1990	1995	2000	2005	2010	2015	2020
1969	1974	1979	1984	1989	1994	1999	2004	2009	2014	2019	2024
Illegal BRMT Bioweapon And Bioweapon Delivery System Program Management - CIA, Army				Hopper 1986-80-86	Burrs 1986-94/96	Fauci 1994/96-06	To Be Identified				
Management - Racketeering And Rights Violations - DOJ and Other Domestic Federal Departments				Weissman 1960s to 1980s				Rosenberg 1980s to 2010s			
BRMT Approximate Stage of Development				Crude Local Hormone Device	Remote Triggered Local Hormone Device	Transition to Remote Device	Advanced Remote Device				
Key Events				FROM MARCH 1975 - ALL BIOWEAPONS BANNED BY RATIFIED TREATY							
Key Government Co-Conspirators - United States departments and agencies including DOJ, FBI, USMS, DHS, USSS, CPB, CIA, DOD, Army, Navy, Air Force, DHHS, NIAID				FWSD, KCSD, WASH, WSU				MA (06-07), NJ, NY state and local government and police powers from 2007			
NATIONAL SECURITY PRETEXTING, FRAUDS, AND ENTANGLEMENTS (NSEC series offenses)											
NSEC-1 National Security Frauds: Government Orchestrated Family Assignment and Deliberate Entanglements in National Security Matters, 1961 to Present											
NSEC-2 National Security Frauds: Human Trafficking, Forced Labor, Peonage, Inculpating Allied Intelligence Services - CSIS, RCMP, MI-6, MI-5, London Metropolitan Police, UK 1990-1994											
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											
NSEC-4 National Security Frauds: Human Trafficking, Forced Labor, Violations of Rights - Mossad, MI-6, MI-5, London Metropolitan Police, UK 2007											
ILLEGAL HUMAN EXPERIMENTATION - BRMT BRAIN HIJACKING ABUSES (HEXP SUBCOUNT OFFENSES)											
Biological and Medical Invasions - Torture											
HEXP-1 Illegal Human Experimentation: Biological and Medical Invasions - BRMT Induced Torture, Washington State 2003											
HEXP-2 Illegal Human Experimentation: BRMT Induced Torture And Psychological Operations, Massachusetts 2006-2007											
HEXP-3 Illegal Human Experimentation: Torture And Psychological Operations, New Jersey 2008-2011											
HEXP-4 Illegal Human Experimentation: BRMT Induced Emotional Swings And Short Cycle Torture Sequences Through 2023											
Orchestrated Personal and Intimate Relationships											
HEXP-5 Illegal Human Experimentation: Personal and Intimate Relationships - Orchestrated Romantic Interests Using BRMT Oxytocin Hormone Brain Hijacking, Generally											
HEXP-6 Illegal Human Experimentation: Personal and Intimate Relationships - Orchestrated BRMT and Other Interference in Marital Community With First Spouse, Lynne 1980-1988											
HEXP-7 Illegal Human Experimentation: Personal and Intimate Relationships - Orchestrated BRMT and Other Interference in Fraudulent Marital Community With Second Spouse, Jeanette 1988-2005											

ILLEGAL CONSTITUTIONAL RIGHTS AND RACKETEERING PATTERN ACTS, VIOLATIONS, AND INJURIES (Timeframes Are Approximate)																
	1969	1970	1974	1975	1980	1985	1990	1994	1995	2000	2004	2005	2010	2014	2015	2020
HEXP-8 <i>Illegal Human Experimentation</i> : Personal and Intimate Relationships - Orchestrated Romantic Interests, Induced Fraudulent Relationship, Marrika 2008												◇				
HEXP-9 <i>Illegal Human Experimentation</i> : Personal and Intimate Relationships - Orchestrated Romantic Interests, Induced Fraudulent Relationship, Laura 2014-2018													◇			
HEXP-10 <i>Illegal Human Experimentation</i> : Personal and Intimate Relationships - Orchestrated Romantic Interests, Induced Fraudulent Relationship, Gia 2019-2021															◇	
Biological and Medical Invasions – Personal Humiliation, Endangerment, Illness																
HEXP-11 <i>Illegal Human Experimentation</i> : Biological and Medical Invasions - Orchestrated Romantic Interests, BRMT Induced Erectile Dysfunction 2005, 2008, 2020-2021												◇				◇
HEXP-12 <i>Illegal Human Experimentation</i> : Biological and Medical Invasions - BRMT Orchestrated Personal Movements and Activities																
HEXP-13 <i>Illegal Human Experimentation</i> : Biological and Medical Invasions - Reckless Endangerment Through BRMT Induced Defamation																
HEXP-14 <i>Illegal Human Experimentation</i> : Biological and Medical Invasions - BRMT Induced Reactions, Symptoms, and Illnesses																
HEXP-15 <i>Illegal Human Experimentation</i> : Biological and Medical Invasions - BRMT Forced Public Urination Sequence, 2022																◇
HEXP-16 <i>Illegal Human Experimentation</i> : Biological and Medical Invasions - BRMT Public Flash Temper Hijacking, 2023																◇
HEXP-17 <i>Illegal Human Experimentation</i> : Biological and Medical Invasions – Food Borne Illnesses 2008-2010, 2018-2023													◇			
INDIVIDUAL RIGHTS VIOLATIONS AND CONSPIRACIES (RGTS SUBCOUNT OFFENSES)																
Entrapments, Illegal Searches and Willful Blindness																
RGTS-1 <i>Rights Violations</i> : Entrapment and Incrimination Attempts, Stevens Pass 1980s																
RGTS-2 <i>Rights Violations</i> : Entrapment and Incrimination Attempts, Money Laundering - Alliance Nominee Cash Bank Deposit 1990, Akoto Structured Payments 2016-2017																
RGTS-3 <i>Rights Violations</i> : Entrapment and Incrimination Attempts – FBI/RCMP VSE Pink Sheet Probe 1992-1993																
RGTS-4 <i>Rights Violations</i> : Entrapment and Incrimination Attempts – FBI Sole Source, CFO Search, Tax Filings, Ironwood 2018-2023																
RGTS-5 <i>Rights Violations</i> : Bad Faith Acts – Illegal Searches, Hacking, and Harassing, Oregon Interstate Commerce Trip 2021																◇
RGTS-6 <i>Rights Violations</i> : Bad Faith Acts – Federal Police Powers Abuses of Legal Processes 1990 to present																
RGTS-7 <i>Rights Violations</i> : Bad Faith Acts – Federal Police Powers Abuses of Legal Processes Forced Personal Bankruptcy 1993																
RGTS-8 <i>Rights Violations</i> : Bad Faith Acts – Willful Blindness - US Attorney Offices, DOJ Headquarters 2005, 2021-2023												◇				◇
RGTS-9 <i>Rights Violations</i> : Bad Faith Acts – Illegal General Searches, Continual Monitoring 1968 to present																
RGTS-10 <i>Rights Violations</i> : Bad Faith Acts – Privacy and Quiet Enjoyment																

ILLEGAL CONSTITUTIONAL RIGHTS AND RACKETEERING PATTERN ACTS, VIOLATIONS, AND INJURIES (Timeframes Are Approximate)												
	1960	1970	1975	1980	1985	1990	1995	2000	2005	2010	2015	2020
	1969	1974	1979	1984	1989	1994	1999	2004	2009	2014	2019	2024
631	RGTS-11 Rights Violations: Bad Faith Acts – Biological and Medical Invasions, Access to Ethical Basic Health Care											
Direct Interferences in Personal and Intimate Relationships												
632	RGTS-12 Rights Violations: Personal and Intimate Relationships - Orchestrated Romantic Interests, Arranged In-person Contacts											
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											
634	RGTS-14 Rights Violations: Personal and Intimate Relationships – Orchestrated Romantic Interests, Fraudulent Dates 2004-2005, 2008, 2019-2020											
Hacking, Harassment, Disinformation, Abuse of Official Records												
635	RGTS-15 Rights Violations: Illegal Searches, Hacking, and Harassing, Computer Technology											
636	RGTS-16 Rights Violations: Blocking Information Access and Supplying Deliberate Disinformation											
637	RGTS-17 Rights Violations: Misuse of Official Records and Mispersonation, Dubai 2015											
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.”											
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)											
640	RICO-2 Racketeering Violations: Theft and Takings - Financial Resources, Obstructing Market Rate Private Employment 1986 to present											
641	RICO-3 Racketeering Violations: Theft and Takings - Financial Resources, Thefts of Compensation CNA 2002 Establish 2008											
642	RICO-4 Racketeering Violations : Theft and Takings - Financial Resources, Thefts of Labor And Materials, Cliffside Park Apartment Renovations 2008											
643	RICO-5 Racketeering Violations: Theft and Takings - Financial Resources, Deprivation of Benefits, Kidnapping, and Involuntary Commitment 2008-2011											
644	RICO-6 Racketeering Violations: Theft and Takings - Financial Resources, Forced Labor Imposed Litigation Expenses 1993-2022											
645	RICO-7 Racketeering Violations: Theft and Takings - Financial Resources, Shadow Banking System Thefts And Manipulations											
Racketeering – Personal Color of Law Entrapment Attempts												
646	RICO-8 Racketeering Violations: Theft and Takings - Credit and Credit Access Hacks											
647	RICO-9 Racketeering Violations: Illegal Searches, Hacking, and Harassing– Tax Software Hack EITC Entrapment Attempt 2021, 2022											
648	RICO-10 Racketeering Violations: SOLE SOURCE Fraudulent Financing with Ironwood Tax Loss Self-Excusatory Offset Attempt 2018-2023											

ILLEGAL CONSTITUTIONAL RIGHTS AND RACKETEERING PATTERN ACTS, VIOLATIONS, AND INJURIES (Timeframes Are Approximate)																	2020
Racketeering – Targeting Small Business and Enterprise																	2024
Racketeering - Thefts and Takings																	
649	<i>RICO-11 Racketeering Violations:</i> Deprivation Of SBA Government Bonding Benefits, UT Bonding Fraud 1990-1993																
650	<i>RICO-12 Racketeering Violations:</i> Theft Of Receivables, Check Frauds 1990 To																
Racketeering - Fraudulent Financials																	
651	<i>RICO-13 Racketeering Violations:</i> Money Laundering - Alliance Nominee Cash Bank Deposit 1990																
652	<i>RICO-14 Racketeering Violations:</i> Factoring Frauds – Pacific Financial Services 1992-1993, PAN Environmental Services 1993-1994																
653	<i>RICO-15 Racketeering Violations:</i> Fraudulent Financial Services – Ex-CIA Northern Africa Case Officer 1992-1995 Alliance																
654	<i>RICO-16 Racketeering Violations:</i> Fraudulent Financial Services – Ex-CIA Latin America Case Officer 2013-2015																
655	<i>RICO-17 Racketeering Violations:</i> Fraudulent Financials and Loans - NYC Broker/Investor 2011-2017																
656	<i>RICO-18 Racketeering Violations:</i> BRMT Assisted Check Fraud Entrapment Attempt – Top US Financial Institution 2014-2015																
657	<i>RICO-19 Racketeering Violations:</i> False Personation – NYC Forbes 200 Captive Corporate Investment Firm 2013-2017																
658	<i>RICO-20 Racketeering Violations:</i> Fraudulent Investor Personation – Investments and Loans 2015-2019																
659	<i>RICO-21 Racketeering Violations:</i> Fraudulent Investor Personation and Investments 2015-2020																
660	<i>RICO-22 Racketeering Violations:</i> Fraudulent Financials – Private Placement and Public IPO 2015-2017																
661	<i>RICO-23 Racketeering Violations:</i> Fraudulent Financials, International CFIUS Pretexting 2015																
662	<i>RICO-24 Racketeering Violations:</i> Fraudulent Financing Fees Supporting Fraudulent Sales Opportunities 2018																
663	<i>RICO-25 Racketeering Violations:</i> Fraudulent Financing Fees 2018																
664	<i>RICO-26 Racketeering Violations:</i> Fraudulent Financial Services – Domestic Debt Broker 2018																
665	<i>RICO-27 Racketeering Violations:</i> Fraudulent Financial Services - International Debt Broker 2015-2016																
666	<i>RICO-28 Racketeering Violations:</i> Fraudulent Financial Services – Mid-Market Investment Bank 2016-2017																
667	<i>RICO-29 Racketeering Violations:</i> Fraudulent Financial Services - International Financial Services Institution 2016-2017																
668	<i>RICO-30 Racketeering Violations:</i> Fraudulent Financial Services – Wall Street and Los Angeles Investment Banks 2015-2021																
669	<i>RICO-31 Racketeering Violations:</i> Fraudulent Financials and Representation, Online Referral Services 2015-2018																

ILLEGAL CONSTITUTIONAL RIGHTS AND RACKETEERING PATTERN ACTS, VIOLATIONS, AND INJURIES (Timeframes Are Approximate)		1960 1969	1970 1974	1975 1979	1980 1984	1985 1989	1990 1994	1995 1999	2000 2004	2005 2009	2010 2014	2015 2019	2020 2024
670	<i>RICO-32 Racketeering Violations: Fraudulent Financials and Financial Representation, Fraudulent Solicited Responses 1986 to 2022</i>					<----->							>
671	<i>RICO-33 Racketeering Violations: Commercial Frauds: Fraudulent Financials and Litigation - AUCTUS v. CORNHUSKER 2019</i>											◇	
672	<i>RICO-34 Racketeering Violations: Fraudulent Financials, Online Platform 2021</i>												◇
Racketeering – Fraudulent Sales Leads													
673	<i>RICO-35 Racketeering Violations: Fraudulent Sales Leads 2002-2004</i>								<--->				
674	<i>RICO-36 Racketeering Violations: Fraudulent Sales Lead Solicitation Services 2021</i>												◇
675	<i>RICO-37 Racketeering Violations: Fraudulent Sales Lead Solicitation Services 2021</i>												◇
676	<i>RICO-38 Racketeering Violations: Fraudulent Sales Lead Development Services 2017</i>											◇	
677	<i>RICO-39 Racketeering Violations: Fraudulent Sales Lead Development Services 2017</i>											◇	
678	<i>RICO-40 Racketeering Violations: Fraudulent Sales Opportunities, International 2020-2021</i>												<>
679	<i>RICO-41 Racketeering Violations: Fraudulent Sales Opportunities, Domestic 1983-2022</i>				<----->								>
680	<i>RICO-42 Racketeering Violations: Fraudulent Sales And Marketing Representation 2019-2021</i>											<---	>
Racketeering – Dishonest Professional Services													
681	<i>RICO-43 Dishonest professional services – Accounting Compilation And Review 1993, 2021</i>						◇						◇
682	<i>RICO-44 Racketeering Violations: Dishonest Professional Services, Web 2021-2022</i>												<>
683	<i>RICO-45 Racketeering Violations: Dishonest Professional Services, Legal 1986-2005</i>					<----->							
684	<i>RICO-46 42 Racketeering Violations: Dishonest Professional Services, Legal 2014-2021</i>										<----->		
685	<i>RICO-47 Racketeering Violations: Dishonest Professional Services, MARICOPA SHERIFF, ARPAIO as Consultant 2014-2017</i>										<--->		
686	<i>RICO-48 Racketeering Violations: Dishonest Professional Services, Employees, Recruiters, Various Positions 1986-2022</i>					<----->							
687	<i>RICO-49 Racketeering Violations: Dishonest Professional Services, Employees, Recruiters, Logistics 2015-2021</i>											<----->	
688	<i>RICO-50 Racketeering Violations: Dishonest Professional Services, Employees, Sales</i>										<----->		
689	<i>RICO-51 Racketeering Violations: Dishonest Professional Services, Employees, CFO and Controller</i>										<----->		
690	<i>RICO-52 Racketeering Violations: Dishonest Professional Services, Employees, Controller 2018</i>											◇	
Racketeering – Fraudulent Production Asset Sales													
691	<i>RICO-53 Racketeering Violations: Fraudulent Production Asset Purchase Options, Professional Services 2015-2021</i>											<----->	
692	<i>RICO-54 Racketeering Violations: Fraudulent Production Asset Purchase Options, AZ 2015-2017</i>											<---	>

ILLEGAL CONSTITUTIONAL RIGHTS AND RACKETEERING PATTERN ACTS, VIOLATIONS, AND INJURIES (Timeframes Are Approximate)	1960 1969	1970 1974	1975 1979	1980 1984	1985 1989	1990 1994	1995 1999	2000 2004	2005 2009	2010 2014	2015 2019	2020 2024
693 RICO-55 Racketeering Violations: Fraudulent Production Asset Purchase Options, OR, ID, TX 2015-2021											<----->	
LETHALITY ATTEMPTS (LETHL SUBCOUNT OFFENSES)												
694 LETHL-1 Lethality Attempts: British Columbia Sea to Sky Highway BRMT Melatonin Overdose – mid 1980s				◇								
695 LETHL-2 Lethality Attempts: Washington State BRMT Induced Falls, 1990-2005												
696 LETHL-3 Lethality Attempts: Washington State BRMT Induced Suicide Ideation 2003-2005									<-->			
697 LETHL-4 Lethality Attempts: Inciting Public Vigilantism, 2004-2023												
698 LETHL-5 Lethality Attempts: New Jersey BRMT Induced Suicide Ideation 2008-2010									<->			
699 LETHL-6 Lethality Attempts: New Jersey Cliffside Park BRMT Falls 2008-2010									<->			
700 LETHL-7 Lethality Attempts: BRMT Staircase Falls and Attempts in New Jersey and New York 2008-2022												
701 LETHL-8 Lethality Attempts: New Jersey, Hackensack, BRMT Fall, 2017											◇	
702 LETHL-9 Lethality Attempts: California, BRMT Induced Extreme Eye Watering, 2017											◇	
703 LETHL-10 Lethality Attempts: New Jersey, Edgewater Bedroom BRMT Falls, 2019											◇	
704 LETHL-11 Lethality Attempts: Website Hacks to Eliminate or Delay Covid Vaccination, 2020												◇
705 LETHL-12 Lethality Attempts: New Jersey Edgewater BRMT Falls, 2021-2022												<->
706 LETHL-13 Lethality Attempts: New Jersey North Bergen Hospital Fall, 2021												◇
707 LETHL-14 Lethality Attempts: New York Metro North Mass Casualty Attempt, 2022												◇
708 LETHL-15 Lethality Attempts: New York Morningside Park BRMT Fall, 2022												◇
709 LETHL-16 Lethality Attempts: New York New Jersey North Bergen Vehicle Rundown Sequence, 2022												◇
710 LETHL-17 Lethality Attempts: Programmed Health Collapse, 2023												◇

Absence Of Valid Defenses - Constitutional Rights Are Protected As State Secret Privilege Is An Invalid Defense 5 U.S.C. § 301 For An Illegal Bioweapon 18 U.S.C. § 175

31. The individual defendants identified between September 2023 and March 2024 and thereby now known to have directly interacted with the formerly unwitting Lead Plaintiff while in those fraudulently concealed roles are named individual defendants herein and, by their recent identifications in those roles, do definitively attach these acts to both themselves, and to the related institutional defendants in which they have and/or do operate. These defendants have and do fraudulently conceal their illegal acts against constitutional rights and their violations of federal law behind the state secret privilege. The state secret privilege is a privilege conditionally granted to government under law, it is not an unalienable constitutionally identified right of government, and their illegal acts are therefor subject to our Constitution, to law under *United States v. Reynolds*, 345 U.S. 1 (1953), and to proper administrative procedures and regulations under 5 U.S.C. § 301. Through their knowing, willful, and sustained acts and patterns of acts in their associated-in-fact enterprise, both directly and through others, these and other defendants have and do destroy the unalienable constitutional rights of US persons, including Lead Plaintiff and others. The individual defendants who are current or former government officials are personally directly liable to these plaintiffs for these systematic violations of constitutional rights under 28 U.S.C. § 2679(b)(2), as are all other defendants.

32. To successfully defend this decades long fraudulently concealed pattern of illegal acts, violations, and injuries and the conspiracies related thereto, defendant UNITED STATES and its co-conspirators must show:

[Intentionally left blank.]

Defendant UNITED STATES And Co-Conspirators Must Assert As Their Defense:	Such Requisite Asserted Defenses Are Defeated By Constitutional Prohibition And By Congressional Intent:
Defendant UNITED STATES, and it co-conspirators must demonstrate (i) a compelling state interest which permits the government to	42 U.S.C. § 2000bb–1 - Free exercise of religion protected –(a)(5) compelling interest test as set forth in prior Federal court rulings is a workable test. The purposes of this chapter are—(1) to restore the compelling interest test as set forth in <i>Sherbert v. Verner</i> , 374 U.S. 398 (1963) and <i>Wisconsin v. Yoder</i> , 406 U.S. 205 (1972) and to guarantee its application in all cases where free exercise of religion is substantially burdened; and
(ii) engage in religious discrimination for the specific purposes of	(2) to provide a claim or defense to persons whose religious exercise is substantially burdened by government. Constitution - First Amendment establishment clause prohibits all religious discrimination absent a compelling governmental interest.
(iii) researching, developing and deploying an internationally prohibited bioweapon and bioweapon system which violates federal law and ratified international treaty, using	Title 18 Criminal Law: 18 U.S.C. § 175, (a) Whoever knowingly develops, produces, stockpiles, transfers, acquires, retains, or possesses any biological agent, toxin, or delivery system for use as a weapon, or knowingly assists a foreign state or any organization to do so, or attempts, threatens, or conspires to do the same, shall be fined under this title or imprisoned for life or any term of years, or both. There is extraterritorial Federal jurisdiction over an offense under this section committed by or against a national of the United States. 18 U.S.C. § 1961, definitions of racketeering offenses include prohibitions against bioweapons and bioweapon delivery systems. 1972 <i>Bioweapons Treaty</i> , ratified international treaty prohibits development and deployment of bioweapons and bioweapons delivery systems since March 1975.
illegal medical experiments on human subjects who are US persons, and	18 USC 2340A, prohibits torture including biomedical experiments without consent. <i>Torture Treaty</i> , Article 14, requires a civil right of action and remedies for torture.
(iv) to engage in explicit patterns of constitutional rights violations, and	<i>First, Third, Fourth, Fifth, Eighth, Ninth, Thirteenth, Fourteenth</i> Amendment violations are subject to myriad criminal and civil sanctions 42 U.S.C. § 1986 provides a civil right of action for neglect to prevent constitutional and civil rights violations, which patterns of rights violations have been conducted together with state and local officials.
(v) establish and sustain a decades long systematic associated-in-fact enterprise	Congressional Intent PL 91-452 (RICO) October 1970 "(a) The provisions of this title [enacting this chapter and

pattern of racketeering acts, and permit others to both conspire and act, which	amending sections 1505, 2516, and 2517 of this title] shall be liberally construed to effectuate its remedial purposes.” 18 USC 1961-1968, prohibits racketeering acts, conspiracies, and establishment and sustainment of associated-in-fact enterprises.
(vi) has and does constitutionally permit the government and its co-conspirators to abuse the states secrets privilege under color of law to sustain fraudulent concealment of the illegal bioweapon and bioweapon delivery system,	5 USC 301, prohibits regulations which violate federal law. <i>United States v. Reynolds</i> , 345 U. S. 1 (1953) prohibits color of law abuse of state secrets privilege.
which illegal bioweapon program it cannot legally conduct except in explicit violation of law.	

33. Defendants cannot make any such showing to this court absent perjury. There are no plausible defenses under our Constitution, our laws, and as clearly expressed in Congressional intent. Neither defendant UNITED STATES nor any co-conspirator defendant can plausibly sustain any defense against these acts undertaken for these illegal purposes; nor for the sustained associated-in-fact enterprise organized, managed, and operated for racketeering acts and these other illegal purposes; nor for their own knowing and willful participation; nor for their knowing and willful fraudulent concealment; nor of any compelling governmental interest to willfully and knowingly violate federal law and treaty prohibiting bioweapons in any form or manner; nor for their willful blindness to the acts of others who are party to this conspiracy. Neither sovereign immunity, nor absolute immunity, nor qualified immunity, all as constrained by Congress, absolutely protects any person from liability for their own knowing and willful violations of our Constitution and laws.

Illegal Cover-Up Benefits Defendants’ Corrupt Intent - Plaintiffs’ Rights, Religion, Property, Family Are Profoundly Damaged

34. Defendant UNITED STATES has and does continue to (i) conduct illegal human subject medical experiments on these plaintiffs without the consent of any of these plaintiffs, and without the direct knowledge of most plaintiffs, which illegal biomedical experiments on human

subjects for illegal bioweapons development, testing, and deployment are comparable in scope to the criminal offenses tried by US prosecutors in the 1946-1947 Nuremberg Doctors Trial, and are decades longer in duration than the three years of illegal experiments by those Nazi doctors, some of whom received the death penalty for those illegal medical experiments. Despite the 1972 *Bioweapon Treaty* and 18 U.S.C. § 175, defendant UNITED STATES has and does continue to (ii) conduct a pattern of racketeering acts incorporating all forms of frauds for the purpose of sustaining involuntary servitude to both perpetuate its control of these plaintiffs and their life circumstances, through its own direct acts and those of its co-conspirators including its own personnel embedded in other police powers operations at various levels of government and through cooperating defendants and other persons to perpetuate (ii-a) its illegal biomedical experiments, and (ii-b) its involuntary servitude over these plaintiff in its direct control and manipulations of life circumstances including, without limitation, health and wellness circumstances, relationships and their progression and destruction, employment and its availability and income level, enterprises and their success or failure, the public reputations of its victims, and its fraudulent concealment of the entire associated-in-fact enterprise through the abuse of police powers exemptions and state secrets privilege, all under color of law.

34A. These continuing coercive illegal BRMT bioweapon and bioweapon delivery system operations by defendant UNITED STATES (iii) operate as a terroristic threat toward populations and toward other governments, as defined at 18 USC § 2331(1)(B)(i) and 25 CFR § 11.402 - Terroristic threats. By conducting coercive, injurious, and illegal BRMT bioweapon and bioweapon delivery system operations against the Lead Plaintiff in full public view, with intrusive illegal video surveillance and during field operations in public places, defendant UNITED STATES has and does (iv) use these demonstrations of dominance over these

individual citizens and their “unalienable rights” and its illegal direct, targeted interferences in the free will of US persons as it perpetuates its involuntary servitude of these plaintiffs to (a) blatantly and illegally advance development of the illegal BRMT bioweapon and bioweapon system, while it (b) makes views of these coercive and injurious operations publicly accessible and (c) has and does provide specific opportunities for the press, media, and the leadership of other nations to view and review these illegal operations, for the implicit coercive purpose of exercising influence and interference in the sovereignty of other nations.

35. These are the core purposes of this entire associated-in-fact enterprise used against these plaintiffs by defendant UNITED STATES, whomsoever the self-entitled members of the executive branch of the government formed “to secure these rights” shall elect to abuse in any given time period – whether for a few minutes, for a lifetime from age 12 (Lead Plaintiff, for example), or for a premature death (Audrey, age 18, paragraphs 10, 801J-I, 803I-K, 805 BD-BK, BS, BV) in a secret field demonstration of total dominance by the illegal BRMT bioweapon and bioweapon delivery system – as defendant UNITED STATES’ continues its blatant and willful violations of our Constitution, the ratified 1972 Bioweapons Treaty, 18 U.S.C. § 175, 5 U.S.C. § 301, and other federal and state statutes cited herein, together with its co-conspirators. These are the corrupt benefits to, and the *mens rea* of, defendant UNITED STATES and its co-conspirators, through their domination of life circumstances in systematic abridgments of unalienable rights and the involuntary servitude of US persons. The damage to these plaintiffs is pervasive, not merely to property and money, but to life, to peace of mind, and to their free will as human beings, and to all that it is supposed to mean to be a free citizen. Defendant UNITED STATES has and does destroy, before the eyes of the world, the very principles our founders fought and died to implement on behalf of themselves and their posterity in their fight for liberty

and in adopting our Constitution. These corrupt illegal purposes and the damages to these plaintiffs extends through each and every act recounted herein, and to those yet to be discovered through this legal process.

36. There is no reason to believe this damage is isolated to some few individual US citizens. The predecessor defendant CIA illegal program MKUltra continued for 20 years as it illegally and secretly distributed 100 million doses of LSD, mostly to unwitting citizens and soldiers in a US population averaging 170 million during that time. The predecessor defendant FBI illegal program Cointelpro consumed approximately 30% of that agency's resources, over 7,000 of its more than 21,000 employee authorized strength, for more than 15 years, doing enormous damage to rights, to organizations formed to secure those rights, to and including violence and murder against US persons. None of these criminal violations was ever prosecuted against either agency which perpetrated this violence against US persons. This damage to US persons presented in this complaint is not isolated, it is most probably pervasive, as it (i) easier to virtually distribute these brain hijacking caused harms than it was to physically distribute the physical drugging harms of MKUltra, (ii) these same government departments and agencies have more resources than before, and (iii) these illegal operations have continued more than three time longer than either MKUltra or Cointelpro, while (iv) combining the patterns of malign acts, violations, and injuries of both those illegal programs. But even if this damage were not pervasive, these plaintiffs are constitutionally and legally entitled to each and every remedy available under our Constitution including, without limitation, the 1970 Racketeering Influenced and Corrupt Organization Act 18 U.S.C. §§ 1961-1968, as amended, 28 U.S.C. § 2679(b)(2), other federal and state statutes herein presented at each claim, and *Bivens*. Color of law abuse of the state secret privilege cannot sustain an associated-in-fact criminal enterprise pattern of

racketeering acts and trump the unalienable rights of U.S. persons under 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U. S. 1 (1953). Actions outside any conceivable scope of authority do not qualify for the privilege of absolute or qualified immunity under our Constitution when the administration of justice is itself profoundly corrupted, self-interested, and completely silent for generations. To qualify for the privilege of immunity, acts must be within the outer perimeter of the constitutionally and legally defined scope of discretionary authority, *Imbler v. Pachtman*, 424 U.S. 409 (1976), and *Harlow v. Fitzgerald* 457 U.S. 800 (1982), and of non-discretionary authority. The simple self-interest of individuals who engaged in non-discretionary functions as they performed specific roles at specific points early in their careers is legally insufficient to sustain abuse of privilege of power or position for the purpose of covering for themselves and for their prior superiors in their later discretionary roles. Nor can it legally suffice as the method of fraudulently concealing their current subordinates who now occupy their former positions, while they engage in supposedly discretionary acts which are nothing more than protecting their indefensible policies and practices from accountability under law. That is mere public corruption and color of law abuse of authority – the very spark which created our republic in its first moments – a rebellion against the capricious tyranny of the powerful. As forensically developed between September 2023 and April 2024, the then unwitting Lead Plaintiff had the following specific known direct interactions and periods of direct interaction with later high ranking of senior government officials over decades of defendants’ corrupt patterns of practice and cover-ups:

Individual	Last Known Senior Government Role	Direct Interactions with Lead Plaintiff
Stephen BREYER	Associate Justice, Supreme Court	1970-72, extensive direct interactions, as fraudulent church elder Snow immediately after Sandra’s murder, and 1974 into 1980s as Jack Sackville-West while at WSU, paragraphs 19(i), 21(i), 99d, 211, 417-418

Janet Reno	Attorney General, Clinton cabinet officer	1966-67 as Martha at Lakeland Elementary School during 6 th grade, paragraph 717, then November 2014 backcheck in Phoenix (paragraph 654A) posing as Gail Jackson with her brother and John Tyler, Cherry Creek Partners. Charles was fka Bruce Zuelsdorf at Lakeland or Lakota around the same time as Martha at Lakeland
Merrick GARLAND	Attorney General, Biden cabinet officer	1974-76 at WSU, plausibly 1971-72 at Decatur High School, paragraphs 5, 99m, 419
Lloyd AUSTIN	Secretary of Defense, Biden cabinet officer, previously Army General Officer	1999, HomeGrocer, Renton, WA distribution center project manager at CNA, paragraphs 19(v), 105 table, 762 table, while ARMY violated the Third Amendment with fraudulently orchestrated spouse Jeanette, and fraudulent brothers-in-law Alexander Vindman, Yvgeney Vindman, who both later served as ARMY personnel on National Security Council
Stansfield Turner	CIA Director under Carter	1979 in NGA cameo, 1990s Spokane memorial service burying Jack Sackville-West legend prior to Breyer promotion to SCOTUS, paragraph 424, 725, 805AS
William BURNS	CIA Director, Biden cabinet officer	1986 to around 1992, extensive direct interactions as LazerSoft Board member and cross-street neighbor during Lead Plaintiff's marriage to orchestrated Jeanette, paragraph 48, 120, 214, 320f, 440, 443-445, 497-499, 557, 600K, 609C, 610, 617C, 627D, 627E, 644D, 652G, 695, 820N, 834, 844, 845, 853
Robert MUELLER	FBI Director under Bush 43, Obama	2017 Pittsburgh backcheck with Rosenberg, possible interactions in 1974 and other dates, paragraphs 467-470. FBI Director during FBI racketeering and trafficking
Anthony FAUCI	Director, NIAID	1996-2002 extensive direct interactions at CNA, paragraphs 21(iii), 30, 58B, 107, 225, 427, 599D(i)d, 600P, 602C, Q-W, AA9a), 604B, 606N, 608A, E, 617G, 626D, J, K, 735, 746, 748, 750, 751, 754, 762 table, 768, 769, 778, 805AD, BA, BB, 810B, c, 841J, AA, 845/e, 853E

The above named individuals' direct interactions with Lead Plaintiff, and the direct interactions of their then current and future subordinates with Lead Plaintiff, including, without limitation, defendants:

- (a) WEISSMAN (who, without limitation, conspired with BREYER and was later general Counsel to FBI Director MUELLER who oversaw defendant FBI throughout the 2001-2013 period of trafficking, torture to suicide ideation, and fraudulent employment of Lead Plaintiff by ROSENBERG),

(b) ROSENBERG (who, without limitation, supervised the human trafficking and fraudulent employment of Lead Plaintiff during the destruction and orchestration of marital communities by BURNS, was maneuvered into two US Attorney roles by Attorney General GONZALES, while ROSENBERG was directly participating in this wrecking process between 2005 and 2008, and who later served as defendant FBI's Chief of Staff to Director COMEY who had himself worked directly for GONZALES at defendant DOJ), are, with

(c) defendant CALDWELL (embedded at defendant WSU for periods between 1974-1977 with GARLAND, and managed by BREYER, paragraphs 99e, 219, 626 later presenting as a private attorney at Seed & Berry in 2004 to protect an illegal FBI racketeering acts operation, paragraphs 275, 276, 462, 830D, 841L, 845E, 853S, and still later Assistant Attorney General Criminal Division in 2014-2017 under Attorney General HOLDER,),

(d) with defendant PRAY, who worked for ROSENBERG,

(e) plausibly with MUELLER, later U.S. Attorney and FBI Director, then backchecked by and with ROSENBERG (paragraphs 467-470, and

(f) myriad other defendants herein,

who are all hopelessly entangled and intertwined with each other - and with the Lead Plaintiff and other members of this class - over more than fifty years of public corruption in these associated-in-fact enterprise patterns of acts, violations, and injuries.

36A. By their willful and knowing consent to this illegal pattern of practice, and by their sustained silence in direct contravention of their oath and duty, three of these perpetrators have progressed to be Cabinet secretaries of the executive branch, and one has now served and retired from the Supreme Court. Still others have served in other senior governmental roles with grave

responsibilities while their own lawlessness has never been held to account. These facts are well established in this complaint and through their various positions identified in public biographies.

These profound and transparently obvious conflicts of interest between:

- (a) these defendants imperative to cover their institutional and specific individual historical patterns of associated-in-fact enterprise racketeering acts, the perpetual intent to cover up the illegal BRMT bioweapon and bioweapon delivery system and the directly related rights and racketeering acts, violation, and injuries used to support and sustain this illegal and internationally prohibited program, and
- (b) the interests of justice which these institutions and these individuals are sworn to protect could not be more profound. These conflicts of interest, and the interactions and intertwined patterns of interactions are representative of, and proximate in time to, direct interactions of these same government officials with other members of this class of plaintiffs, some of which were witnessed and/or directly experienced by the Lead Plaintiff, and all of which are subject to further discovery as to these and to other members of this class of plaintiffs.

37. Continuing coercive and adverse contacts of these institutional and individual governmental defendants with the Lead Plaintiff and with other members of the class have been and are, without limitation, for the corrupt purposes of (i) fraudulent concealment and for (ii) the pervasive, perpetual, and on-going attempts by these defendants both to (a) entrap plaintiffs and to (b) self-exculpate for their corrupt specific self-interested purposes of evading constitutional accountability under law for their durable and systematic violations of law and rights, which violations are summarized at paragraph 251 and in the 54 claims herein at paragraphs 801-854. Establishing justice was laid as one of the five foundational purposes of our Constitution by the

framers in its Preamble and was reinforced in the Bill of Rights drafted by James Madison, the principal drafter of the Constitution itself, to achieve the framer's purpose that the federal Constitution would be ratified as the supreme law of the land by the state legislatures. Those legislative ratifiers, profoundly skeptical of supreme authority vested in any one national government, insisted on these protections as an explicit condition for their ratification, so as to protect the People from offenses against their unalienable rights, including from acts by an overreaching federal government. The ratifiers sought above all to preserve individual liberty and the "unalienable rights" which the People had fought and died for in the Revolution and would again in the Civil War. Defendant DOJ willfully refuses to discharge its constitutional responsibility, and sustains official silence, (paragraphs 550-584), for the profoundly corrupt and illegal purposes of, without limitation, fraudulently concealing and continuing (i) the illegal BRMT bioweapon and bioweapon delivery system (18 U.S.C. § 175) and (ii) the associated-in-fact pattern of racketeering acts (18 U.S.C. §§ 1961-1968) which have been and are used, without limitation, to (a) conceal that illegal weapon (paragraphs 2-5, 322, 357-402) prohibited under ratified international treaty, to (b) conceal biomedical experiments on human subjects without consent performed on US persons (paragraphs 2, 3), to (c) systematically violate constitutional rights to and including torture and forced suicide ideations (paragraphs 604-607 HEXP-1-4), to (d) engage in indefinite detention without charge or trial (paragraphs 600 NSEC-1, 808, 809, 820-822, 839-844), to (e) coerce forfeiture of actions which are protected rights (First and Fifth Amendment, paragraphs 626, 627 RGTS-6-7, 808), and to (f) sustain involuntary servitude in systematic violations of the Thirteenth Amendment (paragraphs 820-822). These systematic violations of constitutional rights and law are in no conceivable way within the scope of the discretionary or non-discretionary authority of any federal department or agency under any

plausible interpretation of our Constitution, nor any plausible interpretation of the doctrine of immunity which governs valid exercise of discretionary authority. They are simply corrupt acts undertaken willfully by these defendants. These plaintiffs must therefore pursue this cause of action themselves, even as they have been and are specifically impoverished, enslaved as involuntary servants, and deprived of their liberty and rights by these defendants acting in their own corrupt self-interest while lacking the discretionary constitutional authority to so act. Impunity cannot prevail under our constitutional system, else we have no Constitutional system at all, we have the very autocracy the founders fought to overcome. There is no other choice left to these plaintiffs but this one.

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JURISDICTION AND VENUE

Subject Matter Jurisdiction

38. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1333, and 18 U.S.C. §§ 1961-1968 over Plaintiffs' claims described herein, including, without limitation:

- (i) Constitutional rights claims against deprivations of, and conspiracies to, violate rights; and racketeering acts, violations, and injuries; by defendant UNITED STATES and its domestic co-conspirators described herein,
- (ii) Claims which arise under the ratified 1972 *Bioweapons Treaty* (effective in force March 1975), the *Torture Treaty* (1984, ratified 1992) which incorporates a right of action directly and specifically contradicting the existing unconstitutional federal law 18 U.S.C. § 2340A argued at paragraphs 328-329, and the Constitution of the United States,
- (iii) State statutory and common law claims because they are so closely intertwined with and related to the federal statutory and international treaty acts, violations, and injuries, conducted by, or in pursuit of, an associated-in-fact enterprise of all defendants which arose and arises out of the collective and individual acts of defendant UNITED STATES, CIA, FBI, WASH, WSU, and their co-conspirator defendants in their acts, violations, injuries, and unconstitutional conduct against Lead Plaintiff and others of the class,
- (iv) Claims arising from other violations of state statutes because those offenses are directly intertwined with and arise from the original violations by defendant UNITED STATES and its co-conspirators, and thereby comprise (a) elements of and within the pattern of conspiracy to commit, and (b) elements within the pattern of rights violations and racketeering activity conducted through an associated-in-fact enterprise in conspiracy with other defendants,

- (v) Claims arising from the extra-territorial actions of departments, agencies, officers, and agents of defendant UNITED STATES, and including, without limitation, CORNWELL CIA, ROSENBERG, FBI,
- (vi) Constitutional rights claims against deprivations of and conspiracies to violate rights; and racketeering acts, violations, and injuries; all by defendant UNITED STATES, its departments and agencies, against these plaintiffs, accomplished through defendant UNITED STATES' purposeful pretexting of these plaintiffs with foreign intelligence and police powers departments and agencies who act in violation of US law within and without the territorial boundaries of the US for the purpose of supporting otherwise illegal police powers operations of defendant UNITED STATES in their own and others' territories, which illegal acts specifically include, without limitation, acts undertaken by and/or with the knowledge of ROSENBERG (FBI) in 1995-1996 by the police powers and intelligence services of Canada and the United Kingdom, and again in 2007 by the police powers and intelligence services of the United Kingdom, which operations were conducted for the purpose of benefitting the corrupt intent of defendant UNITED STATES, ROSENBERG (FBI), CIA, ARMY, and others, against the Lead Plaintiffs' constitutional and legal rights and interests.

Personal Jurisdiction

39. This Court has personal jurisdiction over all defendants under 18 U.S.C. § 1965(a) through § 1965(d) inclusive, 28 U.S.C. § 2679(b)(2), and pursuant to Fed. R. Civ. P. 4(k)(1)(C) and Fed. R. Civ. P. 4(k)(2)(B), because these defendants and their agents caused injuries to plaintiffs through their acts and conspiracy in their acts and omissions originating in, or having an effect in, the Eastern District of Washington which acts and purposeful omissions have been

perpetrated by defendant UNITED STATES, its co-conspirators, and individually liable defendant officers and agents acting in bad faith, and in their joint and several fraudulent concealment of illegal acts against the Lead Plaintiff and other plaintiffs between 1968 to 2024.

Venue

40. Venue is proper in this District Court pursuant to the above described statutes because certain executive decisions, management, and operation, of the associated-in-fact enterprise and other substantial conduct giving rise to plaintiffs' claims have occurred in the Eastern District of Washington under fraudulent concealment, since at least September 1974 against Lead Plaintiff, likely earlier against other members of this class, at the executive direction of defendant UNITED STATES through its myriad intelligence and police powers operations, including, without limitation, defendants ARMY, CIA, DOJ, FBI, and USMS, among others. Specific acts and injuries under executive authorities were directed, managed, and/or conducted by and under the authority of executives and managers with offices in this District by agents and/or officers of defendant UNITED STATES throughout the United States and in foreign countries, specifically including offenses over which this court has been granted extra-territorial jurisdiction. To wit, four categories of specific acts, violations, and injuries against the Lead Plaintiff and other plaintiffs conducted by defendant UNITED STATES, its departments and agencies, in conspiracy with other defendants and their employees domiciled and/or operating in this District, including, without limitation, FBI, CIA, ARMY, USMS, WSU, WASH, BREYER, BURNS, GARLAND, ZOULAS, THORPE, EPSKAMP, DOLAN and other pseudonymed government employees posing as the Sackville-West family in Spokane, WA, through their executives, managers, personnel, and operations in this district including, without limitation:

- (i) Constitutional rights violations including, without limitation, illegal biomedical and psychological experiments on Lead Plaintiff and other plaintiffs without consent and under fraudulent concealment, to continue illegal BRMT bioweapon and bioweapon delivery system development and deployment, which acts and conspiracy inculcate, without limitation, defendants CIA, ARMY, FBI, USMS, BREYER, WASH, WSU, BURNS,
- (ii) the murder of one of Lead Plaintiff's extended family members, Audrey Brewer, age 18, by direct psychological biohijacking of hormones and through the direct manipulation of the hand of a third party using the illegal BRMT bioweapon and bioweapon delivery system program, orchestrated and conducted as a field test of tools of violence by defendant CIA and unknown individual officials and employees of defendant CIA, in a moment of organizational transition and institutional blindness on September 6, 2011 in Walla Walla, WA, under cover of official darkness and of fraudulent concealment, matching an established prior pattern of conduct by defendant CIA,
- (iii) Racketeering acts affecting interstate commerce, violating 18 U.S.C. §§ 1961-1968, within and through the management and operations of federally funded financial and higher education institutions, and in ordinary commerce across state lines in Washington and Idaho including, without limitation, acts which perpetuated involuntary servitude, forced labor, peonage, and other racketeering acts, and which acts inculcate, without limitation, FBI, USMS, CIA, ARMY, Deloitte Seattle, BURNS, WEISSMAN, ROSENBERG, while the unwitting Lead Plaintiff attended WSU in Pullman, WA, and later worked in illegal intelligence probes presenting as consulting projects at the three federally funded and insured Farm Credit Banks and their common enterprise shared

expense administrative department, in Spokane, WA, and while he visited former college classmates and extended family members in this District,

- (iv) Constitutional rights violations including, without limitation, religious discrimination by defendants UNITED STATES, ARMY, CIA, and FBI in human trafficking, illegal human subject medical experiments, and racketeering acts in this District against Lead Plaintiff and other members of this class including, without limitation, directed assignments of classes and professors, interposition of assigned romantic interests and interferences in other personal interests and conduct, and the complete surrounding of Lead Plaintiff and other members of this class by embedded officers and employees of UNITED STATES, FBI, CIA, ARMY, WASH, WSU, the individual defendants named herein and others as yet unknown, who directed, managed, operated, and participated in sustained constitutional rights violations including, without limitation, involuntary servitude, forced labor, and peonage, in support of the illegal BRMT bioweapon and bioweapon delivery system and its continuation of illegal human subject medical experiments on the unwitting Lead Plaintiff and other members of this class while the program was supervised by BREYER posing as Jack Sackville-West in Spokane, WA, and included BRMT team member GARLAND as Robert Mandich at WSU,

all while defendants fraudulently concealed this conspiracy against rights and law behind color of law abuse of state secret privilege. This fraudulent concealment was not unmasked until forensic analysis revealed the accurate and correct identification of the principal individual perpetrators of this illegal program beginning in September 2023. This program was undertaken for the explicit purposes of researching, developing, and deploying the illegal BRMT bioweapon and bioweapon delivery system on and against US persons in systematic violations of their

constitutional rights, and to sustain the fraudulent concealment and continuation of this illegal program by, without limitation, defendants CIA, ARMY, and FBI, as original perpetrators from at least 1968, through defendants' associated-in-fact enterprise pattern of racketeering crimes, acts, violations, injuries to Lead Plaintiff and to other members of this class.

Known Government Conflicts Of Interest Requiring Threshold Consideration

41. This cause of action arises from a very long-running fraudulently concealed illegal program which systematically violates constitutional rights under the *First, Third, Fourth, Fifth, Eighth, Ninth, Thirteenth* and *Fourteenth* Amendments, the RICO Act 18 U.S.C. §§ 1961-1968, and myriad other federal and state statutes summarized at paragraph 251. Defendant DOJ and its agencies have been actively involved in the conduct of this illegal program across multiple federal regions for approximately six decades. The vast majority of federal judges have been drawn from defendant DOJ officials and employees during the pendency of this illegal program, so there are potential conflicts of interest in the federal judiciary. Due care must be exercised to avoid these potential conflicts of interest and ethics to sustain a fair process of equal justice in fact and in appearance, and in accordance with Congressional intent expressed at 28 U.S.C. § 1915, and the Supreme Court mandates expressed in *Neitzke* and *Denton*.

42. Critical key identifications of individual defendants began in September 2023 and continued through April 2024, as described below at paragraph 99. It is this series of identifications of individuals, particularly those of inculcated federal officials, which have finally provided the plain and straightforward connections which tie them to, and which directly inculcate, the particular departments and agencies of defendant UNITED STATES, and serve to directly illuminate the underlying reasons for the depth and breadth of the cover-up undertaken by defendant UNITED STATES and its co-conspirators (paragraphs 550-584).

43. These individual identifications include a former illegal BRMT program executive, now retired former Supreme Court Justice BREYER, whose presence and conduct in this District can be independently confirmed by, among others, DOLAN, the former Chief of Staff to former Washington Governor Gregoire. Three presently sitting Cabinet members were also involved in illegal acts undertaken in this District, BURNS, GARLAND, and AUSTIN, as were other current and former officials in the executive branch at very senior levels, as identified herein.

44. These clear personal conflicts of these specific current and former government executives motivates strong personal self-interest, and that of their subordinates and perhaps some colleagues, to employ all feasible means and resources of these vastly resourced and empowered departments, agencies, and institutions to attempt to perpetuate and conceal the individual direct participation and culpability of these empowered individuals, and to deploy vast resources from the billions of dollars, tens of thousands of employees, and vast executive powers, to perpetuate these acts and to conceal the acts, violations, and injuries which are the object of this litigation. Any *ex parte* communications and claims made by defendant UNITED STATES through defendant DOJ ought to be considered by this court with this factual reality and these direct internal conflicts of interests of these defendants in mind.

45. Other key factors worthy of this court's consideration include, without limitation:

- (i) approximately 13,000 pages of carefully curated predicate act, documentary, analytical, and pattern of practice evidence from independent sources, and specifically relevant independent research and findings, all of which is intended to be presented for the record with the initial filing in a form and manner which this court directs, considering the impoverished status of the Lead Plaintiff and his ability to transmit and file this evidence in a financially feasible manner which

- also assures the integrity of this evidence from electronic hacking, modification, and/or deletion, by potential malign and conflicted actors who can access the vast technical resources of defendant UNITED STATES, which resources have already been used to delete and to attempt to modify certain evidence,
- (ii) evidence from a crucial recent period in 2018-2020, related to continued illegal human trafficking and to racketeering in interstate commerce, has been deleted from Lead Plaintiff's own electronic records, and other evidence has been and is still actively blocked from access during the preparation of this complaint, all by the actions of defendant UNITED STATES, which has and does continue to control the circumstances of the Lead Plaintiff's continued involuntary servitude,
 - (iii) certain key evidence had been strategically destroyed, deleted, concealed, or suppressed by defendant UNITED STATES as described at paragraphs 555-562, 635, 636, 637, Interline Exhibits 17-19,
 - (iv) the current circumstances of the Lead Plaintiff's continued *in forma pauperis* status and continued involuntary servitude directly and proximately inculcate current defendant DOJ's Attorney General GARLAND, and current CIA Director BURNS, as operation of the illegal BRMT bioweapon and bioweapon delivery system continues unabated.

46. This district court's threshold test for admissibility requires the balancing of complex constitutional issues – constitutional rights violations, statutory and ratified treaty violations, color of law abuse of state secret privilege and police powers exemptions, abuse of absolute and qualified immunity, direct constitutional conflicts of law identified herein, and conflicts in rules which govern civil pleadings under existing mandates – all as pled by an *in forma pauperis pro*

se plaintiff, in accordance with the existing Supreme Court mandates of *Nietzke v. Williams*, 490 U.S. 319 (1989), which states that failure to state a claim is not fatal to an *in forma pauperis pro se* complaint, and *Denton v. Hernandez*, 504 U.S. 25 (1992), which mandates that novel claims made by an *in forma pauperis pro se* litigant must be allowed to proceed to discovery and cannot be dismissed as a threshold matter.

47. This court is required to balance these Supreme Court mandates, which sustain *in forma pauperis pro se* litigants' rights to access federal courts extended by Congress in 28 U.S.C. § 1915, with the rights of these extremely well informed, self-interested, and well-resourced defendants. These defendants have concealed themselves behind color of law abuse of the state secret privilege, which abuse violates 5 U.S.C. § 301, as their cloak of fraudulent concealment for approximately six decades of unconstitutional conduct against US persons, to avoid litigation, which exposes durable patterns of bad faith, corrupt, and illegal acts against rights and law by governments, brought by Lead Plaintiff whom they have directly and deliberately impoverished, and who has zealously pursued these rights since initial discovery despite the enormous mountain of prejudicial, discriminatory, coercive, and potentially lethal obstacles presented by the overwhelming power, illegal interventions, and fraudulent concealment of these defendants.

48. The *in forma pauperis* economic status of the *pro se* Lead Plaintiff has been and is directly caused, created, and sustained by defendant UNITED STATES and by these co-conspirator defendants, whether acting directly for their own benefit under color of law, or in conspiracy with other self-interested defendants. Defendant UNITED STATES has and does use wire fraud and other illegal means to perpetuate employment discrimination, racketeering crimes against enterprises of plaintiffs, and deliberate harms to public reputation, as well as its

envelopment and control of the surrounding environment, including, without limitation, for the specific continued purpose of illegal human subject biomedical experimentation, which it has and does use to develop, test, and deploy the illegal BRMT bioweapon and bioweapon delivery system, which is prohibited under the ratified 1972 *Bioweapon Treaty* and 18 U.S.C. § 175, which itself is an integral element of racketeering law as set forth at 18 U.S.C. § 1961(1)(B).

49. In balancing the pleading standards of the Federal Rules of Civil Procedure Rule 8 and Rule 9(b) for both “short and plain” statements and for “particularity in special matters” with (a) the massive and complex fraudulently concealed pattern of facts, with (b) the clear intent of these sophisticated and extremely well-resourced defendants to hide behind claimed police powers exemptions and state secret privilege which are invalidly applied in their color of law abuses, and with (c) the complexities of sustained violations of constitutional rights, of law, and the inherent conflicts of law presented in this litigation, this court must consider that (i) the threshold test required for admissibility dictates that any plausible claim be admitted under *Nietzke* even if not well stated, and (ii) that any plausible facts and pattern of facts are sufficient for pursuit of discovery under *Denton*, even when presented with fatal flaws by an inexperienced *pro se* attorney to a district court, as it reaches any threshold decision under the aforementioned Supreme Court mandates of *Nietzke* and *Denton* involving necessarily complex neuroscience and technologies in which it has neither education nor experience. Lead Plaintiff notes that any matters insufficiently pled by this *in forma pauperis pro se* attorney can be immediately replied upon appointment of counsel, so those claims specifically can be remedied in an amended complaint to comply with other prevailing case law, as in *Bell Atlantic v. Twombly*, 556 U.S. 662 (2009) and *Ashcroft v. Iqbal*, 596 US ____ (2009).