FACTS – GENERAL ALLEGATIONS

INTRODUCTION

Five Basic Illegal Patterns of Practice – Illegal Bioweapon Development, Racketeering Conspiracy, Direct Threats to Life, Involuntary Servitude, Fraudulent Concealment And Willful Blindness

350. Five basic illegal patterns of practice, justiciable by this class of plaintiffs against defendant UNITED STATES and its co-conspirator defendants, demand the attention of and action by this Court –

- 1) First, an internationally prohibited illegal bioweapon and bioweapon delivery system which has been and is being developed by defendants CIA and ARMY abusing unwitting US persons as human subjects of illegal biomedical experiments, psychological coercion, and involuntary servitude,
- 2) Second, a racketeering associated-in-fact enterprise of defendant DOJ, its police powers agencies, and others, initially perpetrated primarily by defendants FBI and USMS, which has and does add other police powers co-conspirators over time, and which has and does (i) abuse civil rights through deprivations and conspiracies to deprive rights; (ii) engage in associated-in-fact enterprise patterns of racketeering acts including, without limitation, involuntary servitude, forced labor, various frauds and thefts; all to support illegal domestic spying operations and to sustain illegal BRMT program development and deployment on and against US persons,
- 3) Third, direct visual threats and indirect verbal threats have been and are followed by specific lethality attempts intended to intimidate, silence, and/or remove the victims as witnesses, together with human trafficking intended, without limitation, to indirectly destroy evidence of defendants' past crimes by the passage of time to secure routine records destruction, and

- 4) Fourth, defendant UNITED STATES has and does sustain involuntary servitude of the Lead Plaintiff since he was an elementary school student, clearly demonstrating its intent to sustain its influence and control over his life, professional career, personal life and relationships, acting to disrupt at will any and all aspects of life, health, and fate to the point of multiple attempts on life at various points during his adult lifetime,
- 5) Fifth, continuing fraudulent concealment and willful blindness of police powers, military services, intelligence agencies, and DOJ, FBI, USMS, and Inspectors General to criminal wrongdoing in their own operations and to co-conspirators' acts, violations, and injuries, against these unwitting plaintiffs.
- 351. *First, an Illegal Bioweapon*, defendant UNITED STATES has and does illegally deploy and operate Brain Remote Management Technology ("BRMT" herein), a neuroscience-based brain hijacking system (paragraphs 359-399, LPEE pages 1-10A) against US persons. This type of neuroscience based bioweapon technology has not previously been used in personalized warfare against people, so it is completely unfamiliar to nearly everyone. A relatively unsophisticated beneficial medical device based upon the same neuroscience principles emerged publicly for the first time in human history in July 2022 when FDA approved human trials of this beneficial medical device, a computer to brain interface, described at paragraphs 374-375, LPEE pages 11-25.
 - A. BRMT is not beneficial to the bioweapon's target, it is not controlled by the user, and it functionally partially controls its victim by hijacking and abusing that person without their knowledge or consent. BRMT is malign, illegal, and internationally prohibited; a bioweapon and bioweapon delivery system developed in secret at massive expense over decades by defendant UNITED STATES abuse of its own

- citizens in illegal field medical experiments on those unwitting human subjects without their consent, who were chosen based upon their religion, loyal service to the United States, or on their parentage by one of those who were religiously discriminated against by defendant ARMY.
- B. BRMT is an offensive weapon of war. Offensive weapons of war can only be deployed against US persons by the federal government in certain very limited circumstances consistent with our Constitution and laws. No such circumstances of rebellion or invasion arise here.
- C. BRMT is a monstrous intrusion by our federal government on liberty, human autonomy, and free will. This offensive biological weapon violates (i) the Constitutional rights of its involuntary victims, (ii) 18 U.S.C. § 175, (iii) the 1972 *Bioweapons Treaty* and four other international treaties, and (iv) Title 42 Chapter 21 Civil Rights, among others. The massive scope of defendant UNITED STATES and its mostly unwitting co-conspirators' Constitutional and statutory violations are summarized in paragraph 251.
- D. BRMT violates (v) the "state secret" privilege mandate that any assertion of "state secret" privilege be "not inconsistent with law," *United States v. Reynolds*, 345 U. S. 1, 12 (1953), discussed at paragraph 260.

Simply put, BRMT is illegal in the United States because hijacking a human brain with a bioweapon is illegal everywhere under both U.S. law and international treaties ratified by the United States.

352. **Second, a Racketeering Conspiracy**, defendant UNITED STATES and its coconspirator defendants, named and as yet unidentified, have and do engage in (vi) an associatedin-fact enterprise pattern of racketeering acts against these plaintiffs including, without limitation, involuntary servitude, forced labor, human trafficking, and other prohibited acts under 18 U.S.C. §§ 1961-1968 and in (vii) an expansive pattern of violations of human, Constitutional, and civil rights under 18 U.S.C. §§ 241, 242, and 42 U.S.C. §§ 1981-1986; all against Lead Plaintiff and this class of Plaintiffs, which conspiracy perpetuates the illegal human subject biomedical experimentation, and causes direct, immediate, and continuing harm to these Plaintiffs. These illegal acts (viii) violate the "good faith" standard mandated for asserting both absolute and qualified individual immunity in *Harlow v. Fitzgerald, 457 U.S. 800* (1982), discussed at paragraph 272-273, causing each individual defendant, whether named or yet-to-be named herein, to be directly, personally, and individually liable for their joint and several conspiracy and knowing bad faith acts, violations, and injuries against these plaintiffs.

353. *Third, Direct Threats to Life*, these acts of (i) illegal human experimentation and BRMT brain hijacking without consent by an illegal bioweapon and (ii) creation and perpetuation of an associated-in-fact racketeering enterprise, by these defendants has been, is, and will be (ix) threats to life, liberty, rights, and the rule of law, against the Lead Plaintiff, against this entire class of Plaintiffs, and prospectively against the legal and constitutional rights of all US persons so long as this Court allows these acts to continue. Absent direct and explicit prohibition by this Court, this long-running pattern of abuses and injuries will continue and may lead to additional deaths.

354. *Fourth, Defendant UNITED STATES Sustains Involuntary Servitude* of Lead Plaintiff from elementary school age to the present using defendant USMS, FBI, CIA, and ARMY personnel in civilian dress, and other co-conspirators, limiting access of other persons except those specifically permitted to make and sustain contact including, without limitation,

determining which persons are introduced to Lead Plaintiff as prospective friends, intimate partners and spouses, employers, business partners, bankers, investors, and customers.

- 355. *Fifth, Fraudulent Concealment and Willful Blindness* of these defendants extends from the simplest and most basic violations of law to the most profound violations of rights and law. These acts, violations, and injuries include, with limitation, range from:
- such very basic acts as refusals and stonewalling of public information requests by police powers, military, and intelligence defendants, particularly including defendants ARMY, CIA, and NARA, who refuse to even acknowledge these requests to correspond and reply to FOIA and Privacy Act requests as legally required under law (LPEE pages 508-541), to
- highly sophisticated mass casualty events targeting Lead Plaintiff and orchestrated to appear as accidents on an express train traveling toward New York City at about 60 mph at sundown on Sunday evening September 11, 2022 (paragraph 707, LETHL-14).
- 355. Regardless of any obfuscation by defendants' claims of "state secret" privilege, classification status, or other alleged privilege, these acts against US persons and others directly and immediately imperil each and every plaintiff victim's life and liberty. The carefully researched facts and fact patterns herein make this five decade long pattern of defendants' misconduct plain and obvious to all, despite the strenuous attempts of these defendants to fraudulently conceal their unprincipled abuse of the state secret privilege and continue their illegal abuses of this class of plaintiffs.
- 356. A detailed description of each of these five intertwined elements of this conspiracy is presented in the narrative below. These five elements are illustrated with examples from the Lead Plaintiff's own experiences, which are representative of the range of acts, violations, and injuries most probably experienced by many other plaintiffs of this class. While the events

themselves are closely intertwined and co-mingled as life events across more than five decades, they are divided here in the same way as they were briefly described above, into five specific domains for ease of understanding:

- 1. Illegal BRMT Bioweapon Development and Deployment
- 2. Racketeering Associated-In-Fact Enterprise Crimes Cover Illegal BRMT Development, Illegal Domestic Spying, And International Commercial Cover Espionage
- 3. Threats, Lethality Attempts, And Human Trafficking Used To Indirectly Destroy Evidence Of Past Crimes
- 4. Defendant UNITED STATES Sustains Involuntary Servitude
- 5. Defendants' Fraudulently Conceal Illegal Operations And Remain Willfully Blind To Violations Of Rights And Law

This fact narrative is followed by 110 specific examples of acts, violations, and injuries to Lead Plaintiff. The chart at paragraph 30 and the timeline in Appendix 2 can be used to relate these acts, violations, and injuries to each other across time. A further expanded timeline, LPEE Table 2, is included at LPEE pages 12023-12120.

1. FIRST, Illegal BRMT Bioweapon Development and Deployment

357. Defendants CIA and ARMY (Bioweapons Laboratory and Medical Corps) illegal human subject biomedical experimentation and deployment began in the 1950s with a series of illegal experiments which then led to over 140 failed illegal CIA MKUltra LSD drug dosing experiments across the United States from 1953 to 1973. MKUltra was itself the straight line continuation of years of depraved drugging and other human subject biomedical experiments on prisoners in the Nazi's Dachau Concentration Camps. Set up a few weeks after Hitler's rise to Chancellor in 1933, the Dachau Concentration Camps housed political, ethnic, and religious prisoners through the May 1945 end of World War II in Europe.

358. At the first of twelve Nuremberg Trials, seven of these Nazi Concentration Camp doctors were sentenced to death, nine to long prison sentences, and seven were acquitted, see *US v. Karl Brant* et al, in the Nuremberg trail record from November 21, 1946 and August 20, 1947. Nonetheless, Nazi Dachau Concentration Camp "medical doctors and researchers" were secretly brought to the United States by defendants CIA, ARMY, and the State Department as part of Operation Paperclip between 1945 to 1959. Defendant UNITED STATES then employed these Nazis in secret labs to pursue intentional illegal drugging and other internationally prohibited "medical research" on Americans and Canadians.

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Interline Exhibit 3: Defendant CIA's Failed MKUltra Mind Control Program, Later Replaced By Illegal BRMT Bioweapon And Bioweapon Delivery System

AUTHOR INTERVIEWS

The CIA's Secret Quest For Mind Control: Torture, LSD And A 'Poisoner In Chief'

September 9, 2019 - 2:50 PM ET Heard on Fresh Air















During the early period of the Cold War, the CIA became convinced that communists had discovered a drug or technique that would allow them to control human minds. In response, the CIA began its own secret program, called MK-ULTRA, to search for a mind control drug that could be weaponized against enemies.

MK-ULTRA, which operated from the 1950s until the early '60s, was created and run by a chemist named Sidney Gottlieb. Journalist Stephen Kinzer, who spent several years investigating the program, calls the operation the "most sustained search in history for techniques of mind control."



CIA charmist Sidney GotTileb headed up the agency's secret MK-ULTRA program, which was charged with developing a mind control drug that could be weaponized against enemies. Correspond to CIA

Some of Gottlieb's experiments were covertly funded at universities and research centers, Kinzer says, while others were conducted in American prisons and in detention centers in Japan, Germany and the Philippines. Many of his unwitting subjects endured psychological torture ranging from electroshock to high doses of LSD, according to Kinzer's research.

"Gottlieb wanted to create a way to seize control of people's minds, and he realized it was a two-part process," Kinzer says. "First, you had to blast away the existing mind. Second, you had to find a way to insert a new mind into that resulting void. We didn't get too far on number two, but he did a lot of work on number one."

CIA has never renounced its mind control goal

(Source: https://www.npr.org/2019/09/09/758989641/the-cias-secret-quest-for-mind-control-torture-lsd-and-a-poisoner-in-chief. See full text at LPEE pages 9679 - 9685.)

Precursor Events: Illegal CIA and ARMY Experiments Use Nazi Dachau Concentration Camp Doctors and Illegal Drugs on US Persons

359. Defendant CIA used the Dachau Concentration Camp human subject medical experiments "expertise" of these Nazi doctors as the springboard for its mind control research. Defendant CIA purchased and illegally distributed 100 million LSD doses, mostly in secret against US and Canadian citizens and soldiers, through more than 140 projects. Its collaboration with defendant ARMY's Bioweapons Lab made CIA the world's largest drug dealer through much of the 1950s and 1960s, mostly targeted against American citizens. Even as the American Mafia were refusing to peddle heroin in the United States, CIA's MKUltra projects were secretly and illegally drug dosing unwitting civilians and soldiers with LSD, then permitting those unwitting drug-impaired hallucinating victims to return immediately and unsupervised to normal activities. These negligent practices endangered, injured, and killed both hallucinating program victims and other innocent people. Police reports show that LSD drug-impaired people are at least as dangerous as any other impaired person. Lacking normal social inhibitions, hallucinating people act as perpetrators and/or victims of assaults, murders, rapes, motor vehicle accidents, and all other forms of public mayhem and disruption. Defendant CIA delivered LSD secretly and without consent to unwitting victims, without prior medical screening for fatal conditions, then turned them loose and watched the resulting mayhem, never interfering or telling others, all while hiding the MKUltra program behind "state secret" privilege as a "national security" program.

360. As defendant CIA ramped up the MKUltra program in 1953, Frank Olson, a contract researcher formerly with defendant ARMY's Bioweapons Lab raised legal and ethical concerns. Late in that meeting with program director Dr. Sidney Gottlieb and others, he was secretly drugged with LSD, hallucinated, and then was isolated from his family for "safety" reasons.

Nine days later, likely semiconscious due to blows to his head and body, he plunged ten stories to the sidewalk from the New York City hotel room he shared with MKUltra Program Director Gottleib's personal assistant. The CIA Assassination Manual of the day stated that a fall needed to be more than 75 feet to assure it was fatal. He died on the sidewalk across from Penn Station in New York City around 2AM on November 28, 1953 (Appendix 2 paragraphs 1-002, 1-003).

361. President Ford and CIA Director Colby formally apologized to Olson's family in 1975 for that 1953 death under CIA Director Dulles. A 1994 exhumation and forensic autopsy led nine of ten members of the autopsy team to conclude Frank Olson's death resulted from blunt-force trauma to the head and injury to the chest, which occurred before Olson dropped ten stories to the sidewalk at 2AM.

362. The Lead Plaintiff's efforts to expose the illegal BRMT bioweapon and bioweapon delivery program have been met with similar hostility and threats in and around New York City, accelerating since 2021, including from defendant FBI and CIA, among others. See Interline Exhibit 15 for several recent visual and verbal threats and indirect physical violence attempts in 2022 designed to appear as naturally occurring events or even as mass casualty events. Other attempts across time are documented, without limitation, at paragraphs 618-620 and 694-710. Defendants FBI, DOJ, and NYPD coverup efforts are documented in Interline Exhibits 17-19.

363. CIA's MKUltra was an epic failure, never coming close to achieving mind control. It was finally shut down in 1973 (Appendix 2 paragraphs 1-005, 1-006). The evidence which identified both the victims it impaired or destroyed and its failure to achieve its malignant objective were destroyed in a never prosecuted government coverup. The CIA Director was sent out of the country two months later, having resigned and been swiftly confirmed Ambassador to Iran, out of sight and out of mind. But the mind control objective remained an active program at

defendants CIA, ARMY, and other DOD military services defendants named herein (see LPEE pages 11937-12022 for a very few examples of their directly relevant weapons research programs). Notably, there was never even one federal felony indictment of any person for the crimes against US persons committed under MKUltra by government employees, agents, and contractors.

CIA And ARMY Conduct Illegal Medical Experiments, Develop Prohibited Bioweapon By Medically Abusing American Civilians As Human Subjects

364. Defendants CIA and ARMY's MKUltra LSD drugs program replacement is the illegal BRMT bioweapon and bioweapon delivery system program. BRMT is a neuroscience and technology platform based mind control (brain hijacking) illegal bioweapon and bioweapons delivery system which violates 18 U.S.C. § 175. This type of bioweapon platform was internationally banned in April 1972 in the *Convention on the Prohibition of the Development*, *Production and Stockpiling of Bacteriological (Biological) and Toxin Weapons and on Their Destruction*, just as the illegal BRMT program was being initiated. By 1968, BRMT had already been used as a crude locally deployed bioweapon which directly hijacked brain hormones by using a frequency tuned device operated locally at a distance from the victim, such as the one used on the Lead Plaintiff on a camping trip vacation at age 12 while being accompanied by Gary JACK, an ARMY or CIA contractor described at paragraph 417 (Appendix 2 paragraph 1-007), who plausibly acted on behalf of defendant BREYER, the program manager of that era.

365. These crude early devices of the 1960s and 1970s could stimulate hormones including, without limitation, melatonin for sleep, adrenaline for alertness and hyper-vigilance, and oxytocin for love. See lethality subcount paragraph 694 LETHL-1 herein for the first known near-lethal application of BRMT to Lead Plaintiff and his first wife, Lynne, in the 1980s. It has been and is illegally developed and deployed by defendant UNITED STATES (ARMY and CIA)

through secret abusive medical experiments and coercive psychological operations on human beings (the fellow citizens these defendants are sworn to protect), as the plaintiff's brains are abused through hijacking in field experiments, without their consent, just as the human subject medical experiments were conducted at Dachau Concentration Camps at Dachau, Auschwitz, and Bergen-Belsen, among others. The illegal BRMT bioweapon and bioweapon delivery system has been developed through these long-running direct experiments on and direct abuses of unwitting US persons including the Lead Plaintiff, who have effectively been the live free-roaming laboratory rats of defendants UNITED STATES, CIA, ARMY, DOJ, FBI, and other defendants, as abused in involuntary servitude. See LPEE pages 6645-6699 explaining basics of the brain and neuroscience, then LPEE beginning at page 1 explaining the illegal BRMT bioweapon.

366. Development of this BRMT illegal biological offensive weapons system continues today at the cost of billions for neuroscience research and for remote technology platform development. Neuroscience has progressed much more rapidly in recent years due to the advances in medical technology tools including, without limitation, functional MRIs used to further the understanding of biochemical brain functions. Other technology platform advances provide similar benefits. Supercomputers are still uncommon, but are used daily in stock trading and other common commercial pursuits. Some of the same types of space-based remote technology platforms which support the illegal BRMT bioweapon and bioweapon delivery system in ordinary commercial applications such as planting 15,000 to 20,000 corn seeds per minute within one-third of an inch across millions of acres every spring for over a decade. Still others applications using this space-based technology reside on your cell phone for high accuracy location services.

367. The same neuroscience principles used illegally in the prohibited BRMT bioweapon are applied to beneficial medical uses against progressive brain diseases like ALS and to relieve spinal cord disabilities. But these commercial developments did not begin in the 1960s, they began around 2012, with much smaller investments to date, so they are much less advanced. An early stage antilog to BRMT (opposite in effect) beneficial medical device, a much less advanced system used to treat, has been approved for FDA human trials after only \$70 million of commercial investment (see Synchron at paragraphs 374-375, see also LPEE pages 1-55). This developing fact pattern was very carefully and fraudulently concealed by technology hacks by defendants from the Lead Plaintiff until 2021, to limit his possible discovery while illegal BRMT development and abuses continued without consent in the meantime, as they still do.

368. Here are a few historical paradigms for skeptics who need further convincing of the possibility of this sort of bioweapon's mere existence—northwest Wyoming's thermal geysers, mud pots, and boiling springs were dismissed as the fantasies of a drunken and delusional man and of those who followed him, from around 1807 until the 1850s. After the invention of photography in 1839, an official expedition was sent to northwest Wyoming in 1871, including a photographer and landscape artist Thomas Moran. In 1872, this nearly sixty-four year long fantasy spun by someone who was considered a clearly drunken and delusional man by most, John Colter, became Yellowstone, the world's first national park. It's now visited by about 3.5 million other "delusional" people each year.

Basic Human Brain Functions Are Commanded by Illegal BRMT External Hijacking

369. The illegal BRMT bioweapon and bioweapon delivery system is intended, designed, and acts to excite or suppress production of common human brain chemistry (biological compounds such as hormones) which are extraordinarily important to the proper

functioning of the human mind and body, including to human health and to exercise of free will in decision-making. See a summary description of BRMT beginning at LPEE page 1 and brief examples of the extraordinarily broad array of adverse effects of BRMT bioweapon operations directly experienced by the Lead Plaintiff from the 1980s to the present at LPEE pages 181 – 181C.

370. Grossly oversimplified, the adult human brain is a six to eight pound biochemical manufacturing and processing plant filled with neurons and glial cells. Neurons are the "thinking and acting" cells which interact biochemically to regulate bodily functions, form thoughts, and send messages to other neurons to complete thoughts and/or command specific actions. Neurons communicate across synapses, which are the cell membrane gaps across which neurons send biochemical messages to communicate through the adjacent neuron cell's membrane into the adjacent neuron cell itself for a further biochemical reaction, such as commanding your right index finger to strike a key on your cell phone keypad. Glial cells are the neurons' servants and guardian cells which regulate the local environment, keeping it sanitary, supplying needed chemicals (oxygen, trace compounds, and so forth), and guarding against biological viruses and other intruders to support this network of billions of neurons. Neuronal networks (simplified here as nerves) carry messages across the brain for further processing, and to other parts of the body, such as muscles and organs to coordinate walking, breathing, swallowing, talking, operating a car, and so forth.

371. The brain operates consciously (experienced for example, as thought and speech) and unconsciously (experienced without thought in regulated and monitored functions like breathing, adjusting eye focus, moving the head, and so forth). Boundaries between conscious and unconscious actions are not clear cut, of course, as we know from observing ourselves and

each other in various situations, such as observing voluntary and involuntary changes in expression and body language, and sudden awareness of normally ignored body system through nervous system signals such as pain or shortness of breath. See LPEE pages 6645-6685 for a basic explanation of neuroscience – the science of the brain and nervous system.

372. The prohibited BRMT bioweapon and bioweapon delivery system is internationally prohibited by the ratified 1972 *Bioweapons Treaty* and illegal offensive military and intelligence weapon born in the 1960s, which operates since the 1972 Bioweapon Treaty outside international law as an offensive weapon, a computer-to-brain weapon used to partially hijack human brains. As a weapon, it can be used for lethal purposes as it is a weapon controlled by a government official, not by the human target. It is not a legal beneficial medical device (a brain-to-computer interface) which is controlled by the user's brain. First, we consider the beneficial medical uses of brain-to-computer interfaces which use the same neuroscience principles as the illegal bioweapon. Then, we consider other important and directly relevant commercial beneficial medical technology which remotely modifies the brain. After those explanations, we pick up the illegal brain hijacking BRMT bioweapon again at paragraph 377.

373. Over the past decade private companies have invested a few hundred million dollars to develop medical devices, relatively crude commercial brain-to-computer interfaces. These early stage commercial prototype beneficial medical devices began being tested in humans after initial FDA approval for human trials in 2021, in pioneering medical treatments of brain injuries, diseases, and other biological and biochemical disorders, including, without limitation, ALS and Parkinson's disease.

374. Synchron, a pioneering New York City-based medical device company received FDA permission for the first ever implant of a brain-computer interface device in July 2022 for a

patient suffering from ALS, after investing \$70 million to that point. An Elon Musk company, Neuralink, is investing \$100 million of Musk's money to develop this type of technology into commercial medical products and has recently received FDA approval for human testing. Other companies are developing brain-computer interfaces to control artificial limbs, among other medical uses.

Source: Synchron.com

375. In another beneficial medical application, hospitals employ tiny pulses of focused ultrasound energy. The device is used through the skull to non-invasively impact malign brain structures such as amyloid plaques in very specifically targeted parts of the brain at specific depths by varying the ultrasound intensity to match the location and depth of the plaque in the brain structure. This focused ultrasound is delivered by a locally operated medical device, some commercial versions look like a dentist's x-ray machine, other like MRI devices, still others like general imaging devices. So, the patient benefits from symptom relief in the brain by a device which operates and uses focused energy pulses from outside the skull.

376. These "miraculous" commercial medical breakthroughs benefit from several hundred million dollars of applied medical research, mostly over the past decade. See LPEE pages 11-139 filed herewith. So, as a practical matter it is currently technologically feasible to impact thought, speech, and action by (a) biochemically "reading" the mind (nerve impulses trapped by the Synchron device to move computer cursors and accomplish other tasks by thinking about them and to (b) act remotely from outside the skull using tiny pulses of energy (focused ultrasound) to alter brain structures and the brain chemistry which comprises our thoughts. This combination of neuroscience principle and technologies is similar to the methods used by the illegal BRMT bioweapon and bioweapon delivery system to hijack the unwitting victim's brain without their knowledge or consent.

377. By comparison with these relatively recent beneficial medical applications, the illegal BRMT bioweapon and bioweapon delivery system has benefitted from tens of billions of dollars of secret research over more than six decades. It has evolved from a crude locally operated device outside the brain which impacts hormones (in 1968, age 12, paragraph 417), to a remotely triggered local device using cell phone triggering of a local device (in the mid-1980s,

around age 28-30, used in double homicide attempt, paragraph 694 LETHL-1) to a fully remote device which has and does employ daemons and highly sophisticated precision location technologies (early 2000s, around age 45-48), and the recent addition of predictive analytics and artificial intelligence in 4-5 years ago (probably 2015-2018, around age 60-63), now age 68 as illegal BRMT operations, rights violations, and racketeering acts by the associated-in-fact enterprise of these defendants continues to operate.

378. This sequence of breakthroughs has leveraged various science and technological research and development progress and defendant DOD infrastructure deployments, particularly of remotely deployed technologies, ultraprecision location systems, and space-based systems which can deploy pulsed energy. The illegal BRMT bioweapon delivery system leverages system integration with other hundreds of billions of dollars of stealthy military technologies which have been developed in parallel with BRMT, including, without limitation, supercomputing software, extreme low latency encrypted communications systems, extreme precision location systems, and precision focused pulsed energy systems. As a result, BRMT is vastly more capable and vastly exceeds the capabilities of the relatively primitive "miraculous" early stage private sector medical devices now in their first two years of FDA approved human trials. But BRMT remains an illegal bioweapon and bioweapon delivery system prohibited under US law (18 USC § 175) and ratified international treaty (1972 Bioweapons Treaty).

379. By using:

(i) Defendant DARPA, In-Q-Tel (CIA venture capital company), and various surreptitious
institutions which have been and are used as funding conduits by defendant UNITED
STATES and its co-conspirators, as cutouts for medical research in coercive psychology,

- neuroscience, computing, and other technological research and development by recognized medical research organizations,
- (ii) together with defendant DOD facilities (ARMY, USAF, US NAVY) and military personnel at times in civilian dress and roles, as well as defendant CIA assets and platforms (which include co-location with commercial cover spies in USMS, FBI, and other cover companies and clients of those commercial cover companies) in the United States,
- (iii) defendant UNITED STATES' has and does sustain deliberate pretexting and national security entanglements of these plaintiffs in involuntary servitude. This pattern of involuntary servitude incorporates acts, violations, and injuries including, without limitation, BRMT bioweapon and bioweapon delivery system abusive human subject medical experiments, coercive psychological operations, other rights violations, racketeering acts, and patterns of racketeering acts which are perpetrated by the associated-in-fact enterprise which includes, without limitation, all these defendants.

Illegal BRMT Bioweapon Operates Like Other Remote Offensive Weapon Systems

380. BRMT, the computer to brain bioweapon, operates in precisely the opposite manner from the beneficial medical devices described above. Rather than assisting the person to perform some operation or create more favorable brain or body function (such as by reducing ALS tremors and other symptom suppression), moving a computer mouse or a biomechanically assisted arm using thought (brain waves) alone, the illegal BRMT bioweapon and bioweapon delivery system hijacks the victim's brain function, so the BRMT operator can then remotely command and control specific brain and bodily function and sets of functions, such as breathing, thought, and/or action.

- 381. The modern version of the illegal BRMT bioweapon uses its prohibited remote bioweapon delivery system to focus precisely addressed energy pulses from vast distances to precise locations in the brain. This precision focused energy is similar to x-rays and radio waves, which are also forms of energy but with different wavelengths than are used in BRMT. Simply put, x-ray waves and radio waves operate at different frequencies and amplitudes (different places on the energy spectrum and at different energy levels) from BRMT. Radio and other communications waves are broadcast widely. BRMT energy pulses are aimed very narrowly with extreme precision at a particular location in the brain to directly hijack the brain remotely.
- 382. Ground based location accuracy enhancement of the illegal BRMT bioweapon and bioweapon delivery system is provided by the precisely located nearest cell phone tower.

 Predictive analytics software adds the extreme precision needed to adjust to head movements and position changes in normal human activities like walking and driving. The speed of light (186,000 miles per second) takes care of the rest the signal pulse and aim point can be adjusted as needed within the short blink of an eye.
- 383. This BRMT bioweapon delivery system uses an ultra-narrowcast pulsed nanometer scale energy pulses to force precise involuntary biochemical reactions at specific locations or sequence of locations in the brain. These energy pulses stimulate particular brain locations, addressing a specific carefully identified brain address or set of brain addresses in a very specific and carefully timed sequence to generate a particular thought, or a particular action or set of actions, such as thought, speech, or movement. The brain of the victim becomes the involuntary servant of the BRMT operator for that particular set of function or actions during the commanded sequence, while other brain activity continues as normal. The BRMT operator thus overrides and hijacks the victim's free will and normal function as they wish. This unnatural

hijacking cannot be detected by the victim. The entire illegal BRMT brain hijacking sequence seems entirely natural to the victim, just as an airplane hijacking would to an airplane passenger when a hijacker took the controls away from the assigned pilot if no one mentioned to the passengers that the cockpit had been secretly hijacked behind the closed cockpit door.

384. The prohibited BRMT bioweapon and bioweapon delivery system has benefited from decades of research and tens of billions of "state secret" government funding, just like other weapons systems. By using other available technologies which adapted for its use (including, without limitation, space-based digital signaling platforms used for other military purposes such as encrypted communications, precision location, and routine navigation), the prohibited BRMT bioweapon can be operated remotely from a secured location just like any armed drone aircraft and many other modern weapons systems and surveillance systems operate daily. Precision location technology and speed of light transmission rates are used, so no direct contact between the supercomputer-based BRMT weapon, the BRMT bioweapon delivery system (using a space-based platform and locally corrected signal), and the impacted victim is required. For local operation, the operator can work from an encrypted hand-held device, which can be disguised as a cell phone. No implant is needed in the victim as the precision focused energy commands a specific sequence of biochemical actions in the brain using remote precise location technologies.

385. No notice or consent are given to the victim as this illegal invasion of rights is performed from behind the "state secret" privilege curtain under the same illegal tacit permission structure used for all other forms of illegal acts against victims in federal police powers operations (45 consecutive years of unprosecuted defendant FBI FISA violations of rights waved off by defendant DOJ come to mind). The victim is completely unaware of prohibited BRMT

commands as they enter invisibly through the skull totally unnoticed into the brain. Just like Covid sneaks through your airways to infect your lungs, BRMT wreaks its form of havoc and mayhem on the unsuspecting victim by direct penetration of the skull to reach very precise locations. Since human brains are all built using similar architecture, a little fine-tuning to the individual will get readily repeatable results rather quickly. In summary, the prohibited BRMT weapon's computer generated signals (which are focused energy like an x-ray, ultrasound, or radio wave) penetrate the skull, hijack the brain's natural biochemistry at very specific locations in very precisely timed sequences, and directly energize neurons (brain and nerve) cells to orchestrate hijacked conscious or unconscious human actions, such as moving limbs, altering body rhythms, changing mood, thought, speech, or action (such as falling asleep or becoming hypervigilant), inducing mental illness by longer-term over-stimulations of certain brain chemicals, and producing all manner of other havoc through hijacking the brain and central nervous system.

386. Since a single supercomputer installation can easily manage three quadrillion (3 million billion) calculations per second, a single instance of the prohibited BRMT bioweapon can send literally billions of digital commands per second, carefully timing these sequences of hijacking commands with extraordinary precision, and potentially commanding multiple victims simultaneously just like an old-fashioned marionette show (or a bunch of malign Muppets). This careful timing and sequencing activate various brain addresses as necessary to achieve the desired hijacked result. The hijacked BRMT victim is completely unaware of these external signals which command the thought or action. This hijacking is experienced by the victim as the completely normal brain function it appears to be. Simply put, everything about these thoughts,

actions, and body functions seems quite normal - except that they did not originate inside the brain of the victim, they were commanded from the outside by a remote operator.

387. Once a brain or central nervous system pattern is identified, and the command sequence to command that pattern is tested to confirm repeatability and reliability to generate a particular precise result in the hijacked victim, BRMT system artificial intelligence can take over and perform further prohibited medical experiments on the victim – testing, mapping and refining myriad tiny variations of that original command sequence to gradually learn to orchestrate other targeted acts. Over time, the command signal sequences needed to hijack and command nearly any thought and/or action desired by the BRMT operator can be accumulated by the supercomputer's memory into a catalog of commands. The operator then simply has to organize these commands to achieve the desired results – be they benign or deadly. This process works just like the high-level commands you use to manage the apps, functions, and steaming media on your smartphone.

388. The BRMT bioweapon operator (i) uses a computer control device to issue human understandable command sequences to the supercomputer, which (ii) translates them to machine understandable language, for (iii) transmission through the BRMT bioweapon delivery system, using common remote communications capabilities to (iv) communicate with a remote device, which then (v) aims and physically delivers a precise pulsed energy command sequence to a precise location, to (vi) cause and create particular biochemical reactions which comprise thought, movement, etc., in the victim's brain. Location accuracy is typically enhanced by a location error correction device near the BRMT victim – for example, a cell phone tower works for this ground-based enhancement as its location is very precisely known.

389. Throughout this entire process, the BRMT operator can interact with the prohibited BRMT bioweapon and delivery system just like an Air Force or CIA drone operator sitting at a computer console in the United States, or use an encrypted handheld device in the field, essentially an encrypted cell phone. The operator uses live imaging, digital mapping resources, and/or field derived intelligence to seek out and identify the desired target then, just like firing a Hellfire missile into the rear window of the target's SUV through the billowing cloud of dust on a dirt road in Afghanistan, the operator chooses when to run a specific command sequence and the illegal BRMT bioweapon and bioweapon delivery system technology delivers the weapon's tiny pulsed energy "bullets" precisely on target, on time, and in the proper sequence to force the thought or act desired by the operator.

390. Since BRMT is a globally prohibited bioweapon operated in secret and against US persons, among others, the prohibited BRMT bioweapon and bioweapon delivery system has long been and is today an obviously illegal clear and present danger to its unwitting victims.

BRMT operators can freely act on the victim's brain to directly:

- (i) alter human breathing patterns, heart rate, and other basic bodily functions accelerating them or halting them entirely. BRMT operators can
- (ii) alter a person's state of consciousness directly and switch it off or on at any time for any length of time, inducing sleep, a lethal fall, or a motor vehicle crash. BRMT operators can
- (iii) alter moods and thought patterns. For good or ill effect, and the victim is none the wiser for being hijacked.

The BRMT operator only needs to impact the victim's brain and central nervous system in the particular ways they desire to perform a specific act. The victim's brain, central nervous system,

and normal body functions already take care of everything else naturally. The BRMT victim is not a total robot, "only a hijacked person under the command and control of another." The victim is kidnapped for all intents and purposes, for the use of another person, without even knowing that this is happening. Entirely illegal, entirely unconstitutional, and entirely possible. As a perpetrator, you would only need to be or know the right government official to get the job done. And we know how accountable the US government bureaucracy is for malign acts. No prosecutions ever, so long as the illegal acts are tacitly tolerated. That's modern American liberty under the existential and very personal threat of the existing illegal BRMT bioweapon and bioweapon delivery system program.

391. Unlike defendant CIA's MKUltra, which used 100 million doses of LSD against a US population of about 170 million people, we do not even know the number of times these BRMT bioweapon and bioweapon delivery system brain hijacking weapons have been fired at unwitting victims over the past fifty-six plus years. Given the accelerating pace of technological change and the speed of today's computer and communications technologies, we can be confident it has been far greater than the 100 million times MKUltra would have illegally provided the LSD doses it purchased from a Swiss pharmaceutical company. A single supercomputer installation of today can process three quadrillion instructions (3,000,000,000,000) per second. Defendant UNITED STATES owns dozens of these supercomputer installations throughout its military, intelligence, police powers, and civilian agencies. The true scope of abridgments of rights by the illegal BRMT bioweapon and bioweapon delivery system is unknown, but it is plain and clear these human biomedical experiments victim plaintiffs have been injured by the illegal BRMT bioweapon and bioweapon delivery system.

392. As with all weapons systems, BRMT has advanced across six decades from a crude local device (used on Lead Plaintiff in a California State Park campground at age 12 in 1968 as related at paragraph 22) to a sophisticated remote system pulsed energy system driven remotely by a remote video monitoring operator or a field deployed operator (as used today on Lead Plaintiff at age 68 during complaint preparation to hijack micro (such as typing acuity) and macro conduct (such as involuntary body movements). US Army Air Force pilots first threw hand grenades and crude explosive charges from the cockpits of their biplanes and triplanes in World War I, then fired synchronized machine guns through their propellers at airborne enemies soon thereafter. Today, their successors fly defendant CIA and USAF drones over Afghanistan and Somalia from bases in the US and Djibouti, and pilot space planes from Edwards AFB and other places.

393. The illegal BRMT bioweapon and bioweapon delivery system is no different in its evolution from crude local device in the 1960s to sophisticated remote device in the 2020s across decades of research and development and billions of dollars of illegal secret expenditures. Bioweapons are prohibited under ratified international treaty and under law, so developing them is illegal conduct no matter who makes the excuse, engages in the conduct, or fails to prosecute criminal violations of law. These illegal bioweapon attacks by defendant UNITED STATES have been and are made on the hijacked brains, health, well-being, and free will of unwitting US persons to illegally abuse this class of plaintiffs in Nazi style illegal field biomedical experiments.

394. BRMT is an illegal weapons system under US law and internationally banned under the ratified 1972 *Bioweapons Treaty*. Its development and use on US persons without their knowing consent systematically violates the constitutional rights of these plaintiffs and is a clear

and present danger to all US persons. Active defendant ARMY participation documented herein, including WILKINS, AUSTIN, VINDMAN, all in civilian dress, is *prima facie* evidence of violations of posse comitatus law, 18 U.S.C. § 1385, as they complied with their illegal orders.

395. Specific examples of illegal BRMT acts, violations, and injuries against Lead Plaintiff and a few other members of the class over nearly six decades are included in the 110 subcounts in paragraphs 600-710 below. These direct acts, violations, and injuries, which have been and are the primarily direct focus of defendants CIA and ARMY culpability are described in the Illegal Human Experimentation subcounts (paragraphs 604-620 HEXP-1 through 16,) and the Lethality Attempt subcounts (paragraphs 694-710 LETHL-1 through 17). The successful known terminations of lives - Sandra, age 11, and Audrey age 18, are described at paragraphs 803 and 805. Other defendants are entangled in these and all other elements of the overall conspiracy, with greater or lesser degrees of culpability to be determined through discovery and proven at trial.

396. The National Security state secret deliberate entanglement subcounts (paragraphs 600-604 NSEC-1 through 4) have been and are leveraged by all culpable federal defendants, primarily defendants ARMY, CIA, DOJ, FBI, and USMS, but also inculpate, without limitation, USSS and CPB, both elements of DHS. These deliberate state secret privilege entanglements have been and are intended to act as the sword and shield against public exposure and to evade both culpability and liability. This fraudulent concealment behind invalidly asserted state secrets privilege is inconsistent with our Constitution and with law (5 USC 301, paragraph 260, and violate the basic premise of *Reynolds*. This conspiracy against rights has been and is sustained by the continuous willful blindness and official silence of defendant DOJ, which has persisted at least throughout the Lead Plaintiff's entire life since Martha (later Attorney General Janet Reno)

was embedded alongside the Lead Plaintiff in 1966-1967 in Mr. Simpson's sixth grade elementary school classroom at Lakeland Elementary School in Federal Way, WA.

397. This overarching conspiracy against rights, incorporating deliberate fraudulent national security entanglements and defendant DOJ willful blindness, shields and enables the effective defeat of the constitutional rights guaranteed to every US person for this class of plaintiffs and for any other US person who becomes the target of defendant UNITED STATES, a known scofflaw, paragraph 332.

398. The BRMT development cycle also has and does leverage acts caused and created by defendants FBI, USMS, and other police powers in their associated-in-fact enterprise pattern of racketeering acts (the RICO subcounts series at paragraphs 638-693) and constitutional rights (the RGTS subcounts series at paragraphs 621-637) acts, violations, and injuries. These act, violations, and injuries have and do create psychological stresses and life circumstances which are used to further the illegal BRMT bioweapon and bioweapon delivery system development cycle, and perpetuate the involuntary servitude of these plaintiffs.

399. Defendants, primarily by and through defendant UNITED STATES, can arbitrarily, without benefit of reasonable suspicion, much less any other valid or due process, target any person which defendant chooses using this illegal associated-in-fact enterprise (18 U.S.C. § 175 prohibiting bioweapons is an element of RICO under 18 U.S.C. § 1961).

400. Defendant DOJ willful blindness (paragraphs 550-583) shields defendant unlawful conduct from criminal liability. National security entanglement fraudulently conceals and fraudulently shields defendant unlawful criminal conduct from public exposure and has been fraudulently asserted to shield defendants' criminal conduct from civil remedies, including from findings of liability, from protection and restoration of rights through injunctive relief, and from

money damages. Perfect crimes shielded by willful blindness and official silence are not the "unalienable" rights our Founders desired for themselves and their posterity. Nonetheless, it is where we find ourselves, and these plaintiffs, today.

- 401. All institutional and individual defendants are hopelessly entangled in this overall conspiracy against rights and pattern of racketeering acts, and bear joint and several liability for all acts, violations, and injuries. Discovery will assist in disentangling degrees of culpability for specific acts and patterns of acts for presentation at trial and for proper assignment of the varying degrees of liability for the 54 claims for relief herein.
- 402. This illegal BRMT bioweapon and bioweapon delivery system of defendant

 UNITED STATES developed using illegal human experimentation on US persons as unwitting human subject is the **first** of defendants' five basic illegal patterns of practice.
 - 1. SECOND, Racketeering Associated-In-Fact Enterprise Crimes Cover Illegal BRMT Development, Illegal Domestic Spying, And International Commercial Cover Espionage
 Historical Federal Police Powers Patterns Of Institutional Criminal Conduct

403. FBI's Cointelpro program, a formally named and sometimes violent war on civil rights ran from 1956 to 1971, targeting Blacks and non-Establishment groups and diverse viewpoints in religion, civil society, and all different kinds of activism ranging from pacificism and free expression to opposition to industrial food production. It was directed and supervised by an Assistant Director in FBI's DC headquarters who reported (from across the hall) to Director Hoover. The program was widespread across the United States, and involved burglaries, breakins, wiretapping without court orders, frauds, character assassinations, sowing of discord in activist groups, and all manner of other criminal acts by FBI field agents. Under Cointelpro, FBI funded far right White Supremacist militia and other right wing extremists, and directly and indirectly spied for fifteen years on American citizens trying to exercise their civil and

Constitutional rights, engage in free speech and assembly, and protest malicious and indifferent police powers and White Supremacist misconduct and crimes against them.

404. Cointelpro began during the Red Scare, around the same time period FBI agents were surveilling the Lead Plaintiff's grandfather's dairy farm in the early 1950, where he led a small evangelical Christian church spin-off of a Quaker sect as an elder in this church, whose traveling preachers were and are known internally as "workers." This term was also used in the socialist and Communist literature of the day, though these uses could not be farther from each other in their practical effect. More on that family history at the hands of defendants FBI, ARMY, and CIA begins at paragraph 406.

405. But such bias existed at the time against non-mainstream religions, just as it had against third generation Japanese-Americans on the West Coast who were sent to internment camps during World War II without cause or reasonable suspicion even as this same ethnic group continued to work at the Pearl Harbor Navy base in Hawaii in the active war zone throughout the war, and as it has against Chinese surnamed sixth generation Americans targeted without cause even today by defendant FBI for "intelligence" operations in our geostrategic competition with China.

406. Defendant FBI's Cointelpro was exposed by the "Citizens' Commission to Investigate the FBI" activist group burglary of files in the FBI's Media, Pennsylvania Field Office. The activists passed the burgled information to the press after the March 8, 1971 burglary. After defendant FBI's illegal Cointelpro program was exposed, notably not by either defendants DOJ or FBI, FBI Director Hoover died in office in May 1972, not under criminal RICO indictment for Cointelpro, but with honors and great acclaim for public service, including the naming of the FBI's DC headquarters building in his name in 1973, and a memorial book

published in 1974 by Congress in his honor. No indictment ever issued for any of the thousands of felony crimes committed by defendant FBI and its network of agents and informants during Cointelpro.

407. Congress enacted legal reforms as a result of these public exposures of CIA and FBI criminal conduct in the mid-1970s. But what federal police powers field conduct has actually changed in the meantime? None, the scofflaw conduct has continued, though without benefit of a formal program title like Cointelpro.

408. In addition to the pattern of evidence presented herein, the FISA Court continues to affirm this perpetual scofflaw conduct, noting the 45th anniversary year of FISA warrant violations by these federal defendant police powers agencies in a 2023 report from that Court. Congress affirmed the 15th consecutive year of Section 702 scofflaw violations of that amendment to the Patriot Act, adopted in 2008 to legalize other prior criminal violations of the Fourth Amendment by these same agencies. Nothing has changed. Scofflaw conduct continues.

Lead Plaintiff's Family Quaker Religious Origins And This Class Of Plaintiffs

409. Lead Plaintiff's great-great grandfather was a Quaker conscientious objector who served in the Second New York Cavalry, Company C, riding unarmed for four years on horseback while bugling his Company on his Army commander's orders in the fight to preserve the Union and free slaves. He won the Medal of Honor at Appomattox Courthouse in April 1865, and lies today in a Quaker Meeting House cemetery in Cornwall-on-the-Hudson, New York, about five miles north of ARMY's West Point Military Academy, 40 miles north of New York City.

[Intentionally left blank.]







Religion Based Targeted Federal Government Abuse Of American Families Across Generations

410. Federal police powers (which here includes defendant ARMY, other military services, CIA, FBI, USMS, and other federal police powers) systematic pattern of abuses of a religious order of Quakers has continued now across four generations of the Lead Plaintiff's own extended family. This pattern of surreptitious illegal acts by federal police powers has been forensically dated to the early 1950s, when the Lead Plaintiff's mother's family was surveilled on the family dairy farm during religious services by the FBI.

411. Lead Plaintiff's dairy farmer grandfather was most probably human trafficked by FBI into employment at Farmer's Union Central Exchange (now Cenex), an agricultural

cooperative in Auburn, Washington, when the family dairy farm provided insufficient income to support the family. He was later human trafficked to another Cenex farmer cooperative in Montana (a national security entanglement related to intercontinental ballistic missile facilities in the region), and still later in life, human trafficked for employment at an interstate hazardous materials trucking company likely also used in defendant FBI spying. This directed employment pattern correlates to other family members, and to defendant FBI co-opting of cooperatives, which co-opting was also directly experienced and forensically discovered by Lead Plaintiff, who in Summer 2023 connected this conduct to defendant WEISSMAN embedded as Lyle Whiteman, General Manager, at Puget Consumers Cooperative in the 1980s, later as defendant FBI's General Counsel under Director Mueller, and connected to defendant CALDWELL through shared projects at the Enron Task Force and at US Attorney for the Eastern District of New York.

412. After defendant ARMY service, Lead Plaintiff's father and uncle were also human trafficked together with their families by defendant FBI as it controlled job choices, income levels, geographic and housing locations, and pretexted them and other extended family members in various national security entanglements. Lead Plaintiff, other extended family members, and their spouses and children, have been subjected to the same kinds of treatment and deliberate national security entanglements. These deliberate surreptitious national security entanglements have been and are systematically used to evade accountability for federal police powers criminal acts against these families.

413. Lead Plaintiff's father was targeted for biomedical experimentation by the ARMY and CIA while serving during the Korean War era. His much younger brother, Lead Plaintiff's uncle Bruce, was targeted while being the first family member to ever attend college, at

Whitman College in Walla Walla, Washington, then while serving in defendant ARMY during the Vietnam era, and for many years thereafter while entangled in the national security space which surrounded the Hanford Nuclear Reservation in Washington state as it produced bombgrade plutonium. Succeeding generations, including the Lead Plaintiff, have been targeted and pretexted basically from birth (Constitutional protections of unalienable rights and prohibitions of bills of attainder notwithstanding) by their parentage and religion.

Lead Plaintiff First Human Trafficked As Collateral To Parental Employment Human trafficking

414. A few years after leaving the ARMY, Lead Plaintiff's unwitting father, Don, was employed and surreptitiously human trafficked in 1961 by an FBI cover company, Pacific Paper Products, Tacoma, Washington. Ostensibly employed as a medical products sales representative to medical offices and clinics, he sold examination room table disposable paper covers and surgical paper drapes for operating tables. By using federal funds to subsidize the medical paper products company operations, this FBI cover company undercut private competitors' prices to gain market access. Lead Plaintiff's father was given a sales lead list of medical facilities to sell these paper products to and offered a bonus for recycling x-ray films from these same health care practices and facilities. With a young family of five living in California, he pursued this added income from those commissions for medical x-ray films recycling.

415. FBI's true intent in secretly employing Lead Plaintiff's father, Don, at the FBI cover company, Pacific Paper Products, was to collect and destroy the medical x-ray evidence of Cointelpro physical violence to victims of FBI's war on civil rights in the United States.

Cointelpro operations included violent acts by FBI agents, other police powers, informants, and by violent criminal militias funded by FBI between 1956 and 1971. Don worked for a year in Northern California, then a second year in Southern California. Don was offered a third year of

employment in Texas, declined to move his family again year after year, and returned to Washington state in 1963. He was then surveilled and manipulated by an FBI undercover embedded agent, Earl Keller, posing as a home fuel oil salesman, at Smith Brothers Dairy, Kent, WA, where he worked as a route delivery driver from 1963 into the 1970s. During this same period, Lead Plaintiff's father was subjected to illegal BRMT bioweapon oxytocin hormone hijacking. A local BRMT bioweapon device was installed in his route delivery truck, concealed inside the ice cream freezer unit installed after King County, WA health regulations were changed to require mechanical cooling of dairy products, replacing ice cooling. The illegal BRMT bioweapon unit hidden in this forward mounted ice cream freezer unit was activated by an operator stationed in proximity of the delivery truck using a radio frequency remote control. Defendant UNITED STATES (CIA) housed a single divorced female at the end of his delivery route and activated the illegal BRMT oxytocin boost using a radio frequency remote control to develop and sustain this specific event-driven oxytocin boost for an uncertain time period of at least four to six months in 1974. Defendant CIA used domestic U.S. brothels elsewhere during this same time period so this type of operation was typical of certain of their operations. Lead Plaintiff has experienced these types of operations (both the hijacked excitement and suppression of oxytocin and other mood hormones) for decades, beginning in 1968 (age 12, California campground), 1970 (Lani FISH love letter), and 1974-1977 (various inaccessible female embedded agents) when he attended Washington State University, including, without limitation, in a 1980s remote cell phone triggering of the illegal BRMT bioweapon device installed in cellular telephone equipment box in the trunk of his car, which defendant CIA activated in the double homicide lethality attempt on Lead Plaintiff and spouse Lynne at Porteau Cove, British Columbia, Canada in the 1980s (paragraph 694 LETHL-1).

416. Defendant ROSENBERG (FBI) offered the same sort of sales commission bonus to Lead Plaintiff as had been offered at Pacific Paper Products to his father in the ESTABLISH fraudulent cover company employment offer letter when defendant ROSENBERG repeated his orchestration of the unwitting Lead Plaintiff's human trafficking out of forced homelessness in Boston, MA to employment at defendant ESTABLISH in Fort Lee, NJ, in 2007. Defendant MODDERMAN (actually Stephanie Clifford, adult film actor) was used as defendant CIA provided the illegal BRMT bioweapon and bioweapon delivery system oxytocin boost during this same time period. Defendants ROSENBERG, ROSS, and ESTABLISH (FBI, USMS) later reneged and failed to pay virtually all these commissions in 2008, costing the Lead Plaintiff tens of thousands of dollars of lost compensation (paragraph 641 RICO-43), exploiting their complete knowledge of Lead Plaintiff's financial situation which left Lead Plaintiff with no financial resources to pursue a legal remedy for this compensation theft under state law (paragraph 641). Defendant MODDERMAN dropped the Lead Plaintiff as a "romantic interest" about the same time these funds were being stolen by defendant FBI and/or USMS (ROSENBERG, ROSS) in Summer 2008. These repetitions of methods across the family generations is a classic defendant FBI/CIA tradecraft signature and rhyme, which demonstrate their well-practiced gratuitous cruelty across generations of field personnel and management toward their targeted victims.

CIA And Army Human Traffick Lead Plaintiff For Illegal Human Medical Experimentation As A Minor Child Beginning At Age 12

417. Lead Plaintiff was first directly human trafficked in 1967 or 1968 around age 12 (1968 is referenced throughout this complaint for clarity and simplicity of presentation), by a former ARMY "buddy" of his father, Gary JACK, for an illegal biomedical experiment on him during a camping trip by a defendant ARMY or CIA bioweapons team which abused his oxytocin hormones by using a battery powered close proximity remote device to activate

oxytocin hormones in a California State Park tent camping site near Redwoods National Park. During 1970, Lead Plaintiff (age 14 on January 1, 1970) and his family of origin experienced a series of extreme emotional experiences as his brother was born in January (echoing the 15 year difference in ages between his father and uncle), his younger sister, Sandra, was murdered by locally embedded doctor KOHLER (paragraphs 99d, 417, 418, 714, 740, 803C-D, 805B(i), H, S, BS, 806B, 814B), with a high dose of aspirin/codeine which induced Reye Syndrome while experiencing influenza in April 1970, and both paternal great-grandparents died in Summer 1970, all within the first seven or eight months of 1970.

417A. Susan, Sandra's surviving twin sister, experienced a blow to her left or right temple on a protruding faucet in the middle of the front lawn at the family residence on South 356th Street in Federal Way, WA, in the months after Sandra's April 1970 death, while riding the family Shetland pony. This blow to the head could have caused a cerebral hemorrhage only months after Sandra's murder. The blow did result in a long-term injury which weakened a blood vessel in her brain, requiring surgery to reinforce that damaged blood vessel about five decades later. This injury event is consistent with a tradecraft rhyme by defendant CIA run against Shawn Morrissey (defendant KATYAL), then embedded and posing as a student at Lead Plaintiff's Decatur High School. During a bareback horse riding lesson given by Lead Plaintiff in 1970 or 1971, defendant KATYAL lost his balance, fell to the ground and struck a metal logging yarder boom breaking ribs. Both these injuries to sister Susan and to defendant KATYAL occurred in the months following Sandra's murder and are circumstantial evidence of equilibrium manipulations using a concealed field aimed version of the illegal BRMT bioweapon to disrupt balance and equilibrium, which symptoms and effects are consistent with the crude forms of

gross manipulations being experienced by the unwitting Lead Plaintiff in the late 1960s and early 1970s.

417B. KATYAL posed as a student in the Lead Plaintiff's Decatur High School with defendant ARMY embed pseudonym Tom GRADY, who replaced embedded ARMY Doug DANIELSON (paragraphs 418, 803Y), who had been assigned at Lakota Junior High School in the late 1960s at the same time Lani FISH (paragraphs 415, 803A, AW, FBI) was also embedded at Lakota. GARLAND plausibly posed as fellow Decatur High School student Stuart Bettesworth in 1971-1972, and the then boyfriend of Mariam BACKMAN (paragraphs 211, 417B, 467, 717, 762 table, 805AB, AC, AK). Decatur High School was a school district spin-out from Federal Way High School organized three years before its building was constructed to support the illegal BRMT program by isolating its child victims for easier program management. It graduated only around 83 seniors in 1973, its first graduating class. The other two high schools in the district routinely graduated over 350 students per year.

418. Within weeks after Sandra's murder in April 1970, Lead Plaintiff's family was abruptly removed from the home-based church meeting place where they had gathered from 1963-1970, to a new home-based church meeting place at the "Snow" residence in Kent, WA, hosted by fraudulent church elder Snow (defendant BREYER, a former ARMY intelligence enlisted member, paragraphs 19(ii), 21(i), 99d, 211, 417). Other "worshippers" in this fraudulently contrived home-based church were the family of an FBI agent then also operating undercover and an older couple who worked for the City of Seattle Water Department at Lake Youngs Reservoir. Also on defendant BREYER's staff in King County, Washington were, without limitation, (a) defendant KATYAL, (posing as Shawn Morrissey, later DOJ Acting Solicitor General) embedded at Decatur High School at the same time as (b) defendant

WEISSMAN, embedded at Associated Grocers, Seattle, WA (his later roles included Assistant US Attorney and FBI General Counsel to Mueller), and (c) GARLAND was also plausibly embedded at Decatur High School (Stuart Bettesworth, later appellate judge and Attorney General). Lead Plaintiff's first job in high school was at an independent grocery store in 1972, Larry's Market, serviced by Associated Grocers (defendant WEISSMAN FBI was illegally embedded at this Seattle wholesale grocery cooperative during this time, later as illegal embed Puget Consumers Cooperative General Manager, described at paragraph 425-436). Larry's Market was co-owned by an extended family member, Larry Brewer, store manager and key partner in the independent supermarket, and surreptitiously co-owned by defendant FBI through an FBI agent posing as a co-owner partner and produce manager who left soon after the Lead Plaintiff was first employed there in 1972. Red haired Brad remained (FBI, later known to Lead Plaintiff in the new identity Mike WORTHY (paragraphs 99k, 418, 422, 493, 726, 762 table, 770, 805AG, AK). Other embedded defendant personnel on BREYER's field operations staff -JACK, KOHLER, KATYAL, GRADY, DANIELSON, FISH, WEISSMAN, GARLAND, BACKMAN, WORTHY - were present as Lead Plaintiff during various periods while Lead Plaintiff attended junior high, high school, and his first year of college. Between 1970-72, the Kent, WA residence was used by BREYER as the front for his fraudulent home church. Defendant BREYER reappeared under a new fraudulent cover in Spokane, WA in 1974, described below. His program management tenure matches the Lead Plaintiff's education from elementary school through graduate school (1960s through 1979).

Lead Plaintiff Extensively And Repeatedly Human Trafficked As An Adult

419. Lead Plaintiff was unwittingly and unknowingly handled throughout college and graduate school by federal agents posing as fellow students and roommates beginning at Green

River Community College, Auburn, Washington in 1973 by Dickover and Brunton, who also accompanied Lead Plaintiff to Washington State University, Pullman, Washington in 1974, where he met and developed friendships and/or close personal relationships with Craig PAGE, Jay Costa, Andrew Ng, Michael CUNHA, WILLIAM SACKVILLE-WEST, Lynn Sorenson, Karen Raines, Linda Pogreba, Vic Jones, James Carberry, Tracy Berry, Katherine "Kit" Andrews, Susan Irish, Bob Ross, Robert Mandich, among many others, as an undergraduate. Lead Plaintiff met Mandich (GARLAND) in WSU Perham Hall residential dormitory in Fall 1974 to Spring 1975 when they resided on the same floor, then both also resided in WSU Nez Perce Village student apartments during the 1975-76 school year. Mandich (GARLAND) drove an older green Mercury Capri compact sedan with extensive door dings which he jokingly accused Lead Plaintiff of causing. Lead Plaintiff opened the door on his 1969 Ford Mustang which door edge landed on one the few places where the green paint was still intact and laughed. GARLAND (Mandich) was then a protégé of defendant BREYER in the BRMT program and, on knowledge and belief, dropped from that cover identity, then was "resurrected" from that cover identity to his actual identity, became an appellate judge, and is now the Attorney General, one of many senior government officials with a direct conflict of interest with the impartial administration of justice and rights as it relates to this illegal program and to this class of plaintiffs.

420. A breakthrough in Summer and Fall 2023 led to the unmasking of numerous individual defendants named below from their previously mysterious cover identities (see LPEE pages 11630 through 11639) and finally definitively linked this illegal BRMT bioweapon and bioweapon delivery system program, rights violations, and associated-in-fact enterprise pattern of racketeering acts to defendant UNITED STATES' agencies and departments who have and do

conduct much of the long-running pattern of fraudulent concealment, at times in coordination with state and local government departments, agencies, and officials. After decades of fraudulent concealment Lead Plaintiff was in September 2023 finally able to begin to unmask the missing identities he had been looking for since beginning his forensic review of the entire history of the illegal BRMT program and racketeering offenses in Summer 2021.

421. While at WSU, the Lead Plaintiff was being handled in the field under a team headed by a BRMT program executive BREYER, (Jack Sackville-West), acting on behalf of defendants ARMY and CIA. Defendant BREYER's team included BREYER's undercover "wife and seven children," who principally resided in the Spokane, WA area including at the "family home" at 1424 South Maple Street all identified by cover name at paragraph 211. Lead Plaintiff was a frequent weekend guest, having been befriended by William (Bill) Sackville-West who resided in WSU student dormitory Perham Hall on the same floor as Lead Plaintiff in 1974-75. Laurie DOLAN, who much later was Chief of Staff to Washington Governor Gregoire, posed as BREYER daughter-in-law Laurie Sackville-West with infant Anne, paragraph 111.

422. After graduating WSU in June 1977, Lead Plaintiff briefly moved to Coeur d'Alene, Idaho, worked for the Spokane, Washington John Hancock Life General Agent and his lead coagent (defendant FBI embeds) briefly, then returned to his parents' home in Federal Way, WA, worked as a relief route delivery driver for several months, and enrolled in the MBA program at WSU beginning in February 1978. While in the WSU MBA program, he met Michael WORTHY (FBI, paragraphs 99k, 418, 422, 493, 726, 762 table, 770, 805AG, AK, who appeared in a group picture with defendant WEISSMAN displayed behind WEISSMAN in 2023 during an MSNBC television interview with defendant MELBER), as well as EPSKAMP, ZOULAS, and THORPE,

423. As a Teaching Assistant to Assistant Professor SHAFFER in 1978-79, Lead Plaintiff shared a WSU Johnson Hall office with PhD in Economics candidate Bahari-Kashani and another PhD candidate from Malawi. Bahari-Kashani was a CIA foreign national asset, an Iranian national whose family was connected to the Shah of Iran (installed as penultimate head of state in 1953 with help from CIA) and, as a result of his CIA asset status, was able to remain in the US after the Shah abdicated in January 1979 and was replaced by Ayatollah Khomeini. As the Shah left Iran and his throne in January 1979, Lead Plaintiff was moved to the basement of Todd Hall (now Carson Hall). SHAFFER, who was Lead Plaintiff's primary graduate school contact in the WSU faculty, and had previously been associated with a petroleum company, and was likely a defendant CIA embed at WSU, where he was joined in 1979 by Don Yale, likely the defendant ARMY embed posing as a retired Navy Supply officer and Assistant Professor.

424. CIA Director Stansfield Turner walked past the completely ignorant Lead Plaintiff with an intent knowing stare in the rotunda of the East Building of the National Gallery of Art during WSU Spring Break 1979 (during his return to WSU from a job interview trip to GTE in Stamford, CT, Appendix 2 paragraph 1-008, 1-009). Turner was directly interested in Lead Plaintiff as part of his mission to transform CIA from a paramilitary organization to a technology-based organization, which transformation emphasized technologies like the illegal BRMT bioweapon and bioweapon delivery system. About five months later, Lead Plaintiff's unwitting involuntary servitude moved on to a new chapter in August 1979, his professional career in involuntary servitude and forced labor. Lead Plaintiff was referred by his WSU professor and assigned CIA handler while a graduate teaching assistant, Dr. Paul Shaffer (CIA faculty embed), to Deloitte Denver and subsequently joined Deloitte Seattle in August 1979, worked as an auditor for about six months, then as a management consultant, later as a

consulting Manager. This Deloitte Seattle operation, actually hosted by defendant USMS, provided commercial covers for deep cover CIA international espionage projects, and for FBI domestic spying and investigations (Appendix 2 paragraph 1-010 through 1-012).

Illegal Human Trafficking In Involuntary Servitude: Lead Plaintiff's Professional Life – Programmed Employment, Unemployment, Enterprise Wrecking 1979-2002

425. Since leaving the WSU MBA program in 1979, Lead Plaintiff's employment and employment deprivations, direct interventions in his private life, including human trafficking of both the Lead Plaintiff and his two spouses, and repeated racketeering offenses against him and his families including, without limitation, compensation thefts, orchestrated forfeitures and compromises of financial, real, and intangible assets, involuntary servitude, and forced labor, ran concurrently with illegal human subject experimentation on him and other family members, lethality attempts, and other crimes, as documented in the 110 example sets of depredations by the United States and its co-conspirators over more than five decades.

426. Lead Plaintiff has spent his entire working career as an unwitting involuntary servant of federal police and intelligence powers inside their commercial cover operations. Throughout this nearly six decade long illegal program, defendant DOJ and its police powers agencies have continually collaborated with defendants CIA and ARMY, which since the beginning of these illegal human medical experiments in the 1960s, have and do hijack and partially control the minds of American citizens using the illegal BRMT bioweapon and bioweapon delivery system. These co-conspirator defendants, with other defendants, have and do engage in an associated-in-fact enterprise through a long-running pattern of racketeering acts, including through numerous cover company, trade association, and other apparently private sector operations, against this class of plaintiffs.

427. These cover companies have been and are used by defendant UNITED STATES including, without limitation, defendants FBI, USMS, CIA, and ARMY for a variety of legal and illegal purposes. Defendant cover entities and organizations have and do compete for private commercial business opportunities, depriving private businesses of legitimate business opportunities by using federal government funding as subsidies to undercut competitor prices. These cover companies have and do conduct illegal general searches and programmed domestic enterprise destruction operations run by defendant UNITED STATES, including, without limitation, by defendants FBI and/or USMS, including, without limitation, through Deloitte Seattle, LazerSoft, Steve's Maintenance (later Alliance Environmental), P.A.N. Environmental Services (PAN), Pacific Pipeline, CNA Industrial Engineering, and ESTABLISH. These illegal cover companies (including, without limitation, Deloitte Seattle, Deloitte client Westin Hotels, LazerSoft, and CNA commercial client Media Arts Group) have and do provide ostensible commercial employment cover legends for CIA commercial cover (espionage) operations throughout the world. In addition, these cover companies also have and do provide non-military covers for ARMY and other military personnel who have and do rotate through in civilian dress including, without limitation, WILKINS and AUSTIN, while engaged in contacts and relationships which violate posse comitatus law, 18 U.S.C. § 1385.

428. At Deloitte Seattle, Lead Plaintiff worked with dozens of targeted clients, many in state and local governments in Washington state, as well as financial services, distribution, and other commercial enterprises, unwittingly aiding and abetting undercover domestic investigations, legal surveillance, and illegal domestic spying operations, such as following defendant FBI into Longacres Race Track, Renton, WA, during a murder investigation; Pierce County, Washington following a public corruption investigation; Whatcom and Clallam

Counties, Washington during CETA investigations; Westin Seattle during the national security event, the visit of Queen Elizabeth II to Seattle; as well in adding credibility to commercial cover legends used by defendant CIA for its international espionage (intelligence operations which are conducted under commercial cover are legally defined as espionage under international law and domestic law) operations in South Africa, Saudi Arabia, Palau, Central America, and other locations in the 1980s. Steve Bannon (later in the White House), Gerald Lee THORPE, John Blair, and Roger STONE (later a political operative), all associated with defendant CIA, were among the people who were employed at this office during Lead Plaintiff's 1979-1986 employment there. John ZOULAS, defendant CIA from Washington State University during the BREYER oversight in Pullman, WA, and nominally employed by Westin Hotels Corporation headquartered in Seattle, was previously assigned to Caribbean nations and directly involved in the national security project at Westin Seattle during Queen Elizabeth II's visit to Seattle in 1983 in which Lead Plaintiff was deliberately entangled during his first known direct exposure to MI-5 and MI-6 personnel embedded there. Lead Plaintiff met his first wife, Lynne, while working on a Deloitte Seattle financial audit at Safeco in 1980 supervised by Margaret Dufresne, a female Deloitte Seattle Manager who was or became the spouse of FBI agent Bruce Ciosacchi, who was also member of the annual community festival group, the Seafair Pirates. Larry SUMMERS, later President of Harvard and then Treasury Secretary, was known as Roger Penner during his brief tenure at Deloitte Seattle. Lead Plaintiff made his first attempt to engage as an entrepreneur leveraging the Westin Hotels project in 1983-84 into Sheldon-Lee Associates where he and THORPE (associated with CIA) funded the development of ActivLabor scheduling software. ZOULAS (Westin human resources manager corporate cover, CIA) then arranged a meeting with the individual he represented as the Westin CFO who rejected the software after a presentation

by Lead Plaintiff despite being the primary corporate driver behind the entire series of project improvement projects throughout the Westin Hotels chain worldwide.

429. A federal agent or other employee embedded as a Deloitte Seattle consulting department secretary was used to bait Lead Plaintiff to join the Board of Trustees of Puget Consumers Cooperative (PCC) in the early 1980s (Appendix 2 paragraphs 1-015, 1-016). At one of the first Board meetings Lead Plaintiff attended, Lyle Whiteman (WEISSMAN, FBI), the illegally embedded PCC General Manager asked Board Chair Hilde Birnbaum to show Lead Plaintiff her arm. She did. It carried a number tattoo engraved somewhere around her eighth birthday, soon after her family had been removed from civilian life to a Nazi death camp. All her other family members perished in the death camp, part of the Dachau Concentration Camp chain of death camps. She survived only because she was selected to be a child subject of human medical experiments by Nazi doctors.

430. Lead Plaintiff did not know, as he looked at that Nazi engraved number tattoo on Hilde's arm in the early 1980s, that he was also already secretly being used by CIA from about 1968 for this same class of medical experiments on humans, being used as a human guinea pig in the development of the illegal bioweapon he knows as BRMT (18 U.S.C. § 175). This time it was by CIA beginning in the 1960s, rather than Nazis from the 1930s through World War II, when that outrage of crimes against humanity ended with justice - the Nuremberg Doctor Trials of 1946-1947, prosecuted by the US and other allies.

431. Lead Plaintiff also did not then know the actual identity of Whiteman. In Summer 2023, as this and several other fraudulent concealments of identities were finally unmasked through a lucky break, Lead Plaintiff finally came to understand that Whiteman is actually Andrew WEISSMAN. WEISSMAN, posing as Lyle Whiteman. was an illegally embedded FBI

agent directly engaged in co-opting Associated Grocers, then Puget Consumers Cooperative, wholesale and retail food cooperatives respectively, and who later organized NutraSource, which was headed by ROSENBERG (FBI) during Lead Plaintiff's PPC Board tenure as part of FBI domestic spying and enterprise wrecking program which FBI continued well into this century, more than fifty years after its long-running illegal Cointelpro program was exposed in 1971. Congress did enact reforms in the 1970s to prevent these illegal activities. But these reforms were functionally ignored, they simply did not work. WEISSMAN later became FBI General Counsel under FBI Director Robert Mueller, later still a law professor at New York University

432. FBI's "Chuck LeFevre" (ROSENBERG) came to Seattle soon after Lead Plaintiff's introduction to the Nazi tattoo on Hilde Birnbaum's arm by WEISSMAN. LeFevre (ROSENBERG) arrived from Anchorage (likely an undercover role run from the FBI Anchorage field office) to run NutraSource, a natural foods wholesaler funded by PCC member equity dollars (\$200,000) and a secret FBI investment (\$200,000) funneled through two entities (Carrs retail and Gottstein wholesale grocers in Anchorage, represented by Allan Gallant (\$125,000) and LeFevre, and the Oakland Food Cooperative (\$75,000) which was then in the final stages of being financially wrecked by two FBI agents embedded in that cooperative who also served on the NutraSource Board). NutraSource was formed out of the federal bankruptcy court supervised wreckage of three natural foods companies in the Seattle, Washington area, themselves likely also wrecked by FBI. Through this sequence of fraudulent concealment, FBI effectively controlled the Boards and operations of both PCC and NutraSource through ROSENBERG, WEISSMAN, GALLANT, and the two FBI agents who co-opted and destroyed the Oakland Food Cooperative. These five people served with the Lead Plaintiff and the Controller of Crowley Maritime, Wendy Stiers, on NutraSource's seven member Board of Directors.

433. By forming the natural foods wholesaler NutraSource using private sector funds contributed by PCC member equity investments in the food cooperative and their food purchases, FBI could directly spy on all the food cooperatives and buying clubs throughout the Pacific Northwest, not just on PCC members and staff. FBI was also able to use funds being paid as executive compensation to FBI embedded managers by the members and use cooperative member funds as they saw fit in their embedded management roles, including for an exclusive golf country club membership for ROSENBERG at Sahale Golf and Country Club near Redmond, Washington.

434. ROSENBERG was joined at NutraSource by Darrell PRAY (Chief Information Officer, later also at Pacific Pipeline as CFO during Lead Plaintiff's tenure there on that Board and as COO), James CHRISTENSEN (Chief Financial Officer, later also at Pacific Pipeline as CFO during Lead Plaintiff's tenure there on that Board and as COO), DANA SMITH (VP of Operations) and others at NutraSource. ROSENBERG, years later in 2005 through 2008, human trafficked Lead Plaintiff through Boston and homelessness (paragraphs 462-464) to northern New Jersey and fraudulently concealed employment at ESTABLISH (described below at paragraphs 464-466). ROSENBERG still later left FBI and became a US Attorney, then DOJ's DEA Acting Administrator under Obama, and still later joined a Washington, DC law firm, and is a professor of law in Washington, DC.

435. Government defendants including, without limitation, defendant FBI routinely use privately derived funds to pay for expenditures not permitted in government operations, which can and do directly benefit those illegally embedded government employees and their personal interests. As one example of this pattern of practice of direct personal benefit, NutraSource paid fees and costs for a Sahale Golf and Country Club membership in Redmond, WA for embedded

FBI CEO "Chuck LeFevre," (ROSENBERG, FBI). This was agreed to by the three PCC Board members on the NutraSource Board, which included defendant WEISSMAN (FBI) who encouraged Lead Plaintiff to vote for this golf country club membership in spite of PCC's core values as a community-based organic and natural grocery cooperative committed to farmland preservation and quality of life and environmental goals, and sharing benefits with its members, not empowering executive management privilege. Defendant ROSENBERG routinely talked about his Walla Walla wine tours to Leonetti Cellar and to other winery locations in the Walla Walla, WA area in the 1980s and 1990s, where the Lead Plaintiff's uncle lived during most of that period, and where members of his extended family lived throughout the period. Defendant FBI also used its secret control of the NutraSource Board to steal money rightfully belonging to PCC for defendant FBI's own unappropriated use in further illegal cover operations. According to WEISSMAN, after NutraSource was sold to a private company in Auburn, CA, sale proceeds were allocated to defendant ROSENBERG, despite his having no known investment nor any known contractual rights to any of the sale proceeds. PCC made the original private sector investment in NutraSource, provided critical early cash flow ahead of payment terms to keep NutraSource in business, and was the principal customer of NutraSource throughout its entire existence. ROSENBERG invested these funds, diverted from PCC, into a golf driving range near Gig Harbor, WA which went bankrupt, and a high-end Seattle, WA wine shop. This diversion from the rightful owners violates 18 USC § 1962, which prohibits such diversions and has been cited by defendant DOJ in criminal racketeering prosecutions of labor unions and mafioso organizations.

436. Defendants FBI and CIA continued their prominent role in Lead Plaintiff's life.

Defendants WEISSMAN and ROSENBERG, both then deep cover FBI agents operating as

illegally embedded executives in private companies were joined in the middle 1980s by two undercover personnel from CIA (Roger STONE, William BURNS, described later herein) in surreptitiously operating against the Lead Plaintiff, and by Warren WILKINS, a Washington ARMY National Guard Colonel who reported directly to the Adjutant General. David Moller (STONE) is Roger STONE, the political operative and consultant associated with the Republican Party opposition operations from Nixon through Trump.

437. In Summer 1986, Lead Plaintiff was being gently pushed out by then current Deloitte Seatle consulting boss Michael Henderson and pulled out by his former Deloitte Seattle consulting boss Harold Hopper to transition from Deloitte Seattle (USMS hosted) to another CIA/FBI joint technology spying project, LazerSoft.

438. Lead Plaintiff joined STONE, who had left Deloitte Seattle soon after completing the South Africa ATM project used by CIA for southern Africa financial network spying and proxy war funding, WILKINS (ARMY), TARPLEY, and others to develop laser optic archival mass data storage systems for use with IBM mainframe computers. These laser optic data storage systems could then be co-opted remotely by FBI and CIA to access corporate information systems, such as at Puget Power, a major regional utility, and Alaska Airlines, for use in illegal surveillance and search violations inside the United States. None were known to have been sold internationally during LazerSoft's existence before it was sold, renamed as LaserAccess by Wembley plc to Network Imaging Corporation, Vienna, Virginia in the early 1990s.

439. Soon after Lead Plaintiff joined LazerSoft in Summer 1986, Moller (STONE) was orchestrated from the company by other management team members interacting with the Board for Moller's (STONE) fraudulent "termination." Ruthanne Meyers, Ron Blankenship, and several others left soon thereafter. Lead Plaintiff then became CEO, a transition which would

become very typical over the next fifteen years in one unwitting cover company leadership position after another at various defendant USMS cover operations which supported illegal spying and other domestic and international operations run from and in the Seattle area.

WILKINS, and TARPLEY continued at LazerSoft as co-workers. WATERS joined as a software development contractor.

440. William BURNS, the current CIA Director, was then posing as an OB/GYN doctor known as Pat Heffron. BURNS was a key LazerSoft funder and Board member in the late 1980s and remained in the King County, WA area through at least the early 1990s (as a neighbor of Lead Plaintiff from March 1990, paragraph 499). Heffron (BURNS) "raised" most of the needed funds for the company to continue its operations. Heffron (BURNS) is now known to most probably be the CIA field executive in charge during that period of the illegal human experiments program used against Lead Plaintiff and other members of this class of plaintiffs to develop the secret illegal BRMT bioweapon and bioweapon delivery system. During this period, as defendant BURNS (CIA) operated in front and behind the scenes with defendant ROSENBERG (FBI) in similar roles, Lead Plaintiff was exposed to entrapment attempts and lethality attempts (paragraphs 621 RGTS-1, using a local device at Stevens Pass, 694 LETHL-1, using equipment installed by SWAIN), was divorced by his first wife Lynne in 1988 as the result of illegal BRMT oxytocin (love hormone) hijackings orchestrated by defendant BURNS while she was in the company of SWAIN in 1987 (paragraphs 494-498, 609 HEXP-6). Lead Plaintiff was introduced to his fraudulent second wife Jeanette (active duty soldier in deferred prosecution status, paragraphs 499, 610 HEXP-7) in the first half of 1988 by WATERS at the Greenwood Inn basement lounge, Bellevue, WA, while at LazerSoft, as WATERS himself allegedly went through a divorce during this period.

441. As the LazerSoft System 1500 beta software development and mainframe integration project was nearing completion at Puget Sound Power and Light, a regional electric utility company in Bellevue, WA, Lead Plaintiff sought venture capital funding to expand sales and marketing operations beyond the small Seattle area beta site customer base. He reached an agreement with Ted Wight, Walden Venture Capital, for a \$1.2 million investment, but was later informed by counsel, Glen Garrison, Keller Rohrback, Seattle, WA, that Walden's Managing Partner in San Francisco declined to complete the deal. After he was unable to locate another venture capital investor on the West Coast to work with the remaining VC, Ventures West, Vancouver, BC, (Samuel Znaimer), who did not want to be the lead investor in LazerSoft, Lead Plaintiff turned to another local company, Pacer Corporation, to complete the sale of LazerSoft

442. Pacer (Larry Azure, CEO) quickly agreed to purchase LazerSoft, but the deal was delayed for about five months, while Pacer was sold to Wembley plc, the UK based entertainment company which owns Wembley Stadium. Lead Plaintiff was terminated as CEO as the LazerSoft deal closed in 1989 and replaced as CEO by Richard Milligan, appointed by Pacer management. Invited to rejoin Pacer operations about 6-8 weeks later, the Lead Plaintiff declined, briefly joined a Redmond, WA fax switch technology company, then decided to acquire a company in the environmental services industry, Steve's Maintenance (paragraph 445), which he completed in March 1990 with the assistance of funds from Jeanette and an investor, David J. Carey, a former SVP of commercial lending at Rainier National Bank in Seattle, WA, just days before his March 1990 fraudulently orchestrated marriage to Jeanette.

443. Jeanette lived directly across the street from BURNS (see paragraph 499 and subcount NSEC-1) from at least 1988, prior to Lead Plaintiff moving in late March 1990, one night before his marriage to Jeanette. Defendant ARMY and FBI personnel assigned as their part

of this phase of the involuntary servitude network entrapment and envelopment process perpetuated by defendant UNITED STATES include, without limitation, defendants MELBER, RUBIN, VINDMAN. Personal life and relationships details are described in paragraphs 490-535 below.

444. Other institutional and individual defendants also appeared during this late 1980s to early 1990s time period while BURNS ran the illegal BRMT bioweapon development cycle.

Most of those defendant ARMY, FBI, and USMS personnel were known to the unwitting Lead Plaintiff as his second extended family, which resulted from the WATERS orchestrated introduction and Lead Plaintiff's subsequent fraudulent marriage to Jeanette in 1990.

445. After a diligent search in late 1989, Lead Plaintiff located Steve's Maintenance (Appendix 2 paragraph 1-017) in Auburn, WA, raised equity financing from David J. Carey the former SVP of commercial lending at Rainier National Bank (located through a previously made connection with John C.T. Conte, most likely FBI Seattle) and closed the asset purchase in March 1990, about one week before his fraudulent marriage. By forensic analysis, Steve's Maintenance, renamed as Alliance Environmental Services, then became the next defendant FBI/CIA/ARMY vehicle for the next phase of the financial wrecking process which was used to impose financial and psychological stress useful in the development of the illegal BRMT bioweapon. BURNS continued to live in the house directly across NE 149th Street from Jeanette in Kirkland, WA into the early 1990s where Lead Plaintiff had moved to join Jeanette and stepson Bryce upon their March 1990 marriage.

446. This 1990-1993 Alliance small business typically employed about 15-20 people, except on the Sea-Tac BCD Concourse project described below, which required immediate hiring of 80 people (paragraphs 449, 652). The enterprise wrecking process began even before the

Steve's Maintenance asset purchase was closed in March 1990 with (i) attorney THORBROGGER's (while posing as commercial legal counsel at Short Cressman and Burgess with HIBBS) attempt to exclude from the asset purchase and sales agreement paragraph 12, a cost plus provision on existing Steve's Maintenance contracts which were assumed during the purchase (paragraph 601 NSEC-2; 622, 626 RGTS-2, 6; 649, 651, 653, 683 RICO-11, 13, 15, 45) and (ii) deliberate overstaffing of the company prior to deal close by the then current "owners." From the closing date forward, defendant UNITED STATES engaged in a further series of racketeering acts, including, without limitation, (iii) deprivation of government benefits by an FBI agent posing as an SBA employee who denied SBA bonding which the company had always previously used prior to the deal's close (paragraph 649 RICO-11) and is vital to bid and perform the government environmental services contracts which comprised almost all the company's revenue, (iv) receivables theft (about \$160,000 misappropriated by former "owners" Steve and Kerry "Brewer") and its forced compromise (to about \$80,000 net, less legal fees paid to Short, Cressman and Burgess, Seattle, WA, where Robert HIBBS and Susan THORBROGGER were employed) on a Bates Vocational Technical College, Tacoma, WA, asbestos abatement project, which compromise cost the company over \$80,000 (one-third of its total original capital and loans) in the first few months of ownership (paragraph 650 RICO-12). While field operations proceeded smoothly for a time, (v) fraudulent contract performance bonds (issued fraudulently by FBI, paragraph 649 RICO-11) on a defunct Utah insurance company, (vi) a deliberate project delay and then a dramatic acceleration requirement forced a massive and very expensive staffing problem (more than \$100,000 of excess labor on approximately \$444,000 base contract amount) during the federally funded Sea-Tac Airport concourse expansion project which delay/acceleration was entirely prompted by defendant FBI coordination with general contractor

Mortenson to compress the schedule and to cost the company still more money and which added still more stress (paragraph 649 RICO-11). Defendant FBI also attracted IRS attention to Alliance through a fraudulent pretexting by making an \$80,000 overnight cash deposit and withdrawal in the company's bank using the Alliance name but actually controlled by Kerry Brewer (actually FBI posing as the principal "owner" of Steve's Maintenance), which triggered an IRS interview (paragraph 651 RICO-13).

447. During a fraudulent cross-border financing failure intended to capitalize Alliance in 1992, Gerald CORNWELL and/or his near identical or identical twin brother, posed as a financial broker. While presenting his credentials and experience to Lead Plaintiff, CORNWELL alleged financing connections with brokers at the Vancouver Stock Exchange, a speculative venture based small capital stock market typically used to raise money for mining exploration projects in Canada and elsewhere. He claimed to be retired from a center pivot irrigation system installation business and worked with a female FBI agent posing as his wife in Newcastle, WA, to bring RCMP, CSIS, and Ralph Shearing (who ran a geotechnical drilling company which worked in mining exploration throughout Canada) into this corrupt fraudulent financing pattern. CORNWELL was most probably actually a former CIA agent who had previously sold center pivot irrigation systems as his cover for other commercial espionage operations in Libya and north Africa from his commercial cover company in Pasco, WA, near the Hanford Nuclear Reservation during much of the same period when Lead Plaintiff's uncle Bruce and family had lived there.

448. CORNWELL (formerly NAVY, then CIA) and FBI worked, unknown to Lead Plaintiff, with RCMP, CSIS and Shearing to develop a fraudulent financing package which required a financial audit. A \$20,000 factoring loan from Pacific Financial Services, Bellevue,

WA (a fraudulent factoring company run by Henry Wozow, probably FBI and possibly later known as the factor in California who allegedly stole \$160,000 from PAN, then as David Brown while at CNA and still later as Ron McCormick at Walmart) was used to cover the financing fees and expenses. When this fraudulent financing eventually failed in Vancouver, BC, Canada, the \$20,000 factoring loan turned in a few months into a loan default totaling \$65,000, which Lead Plaintiff had personally guaranteed, and then into personal federal bankruptcy in November 1993 for Lead Plaintiff and his fraudulent second wife Jeanette.

449. While the Sea-Tac BCD concourse expansion project was underway in 1991-1992, John Steele came to work on the project in 1991 through the Laborer's Union Hall where Lead Plaintiff was forced to hire to quickly add staff to the deliberately delayed then accelerated project to meet a dramatically accelerated work schedule. Lead Plaintiff promoted Steele to Project Superintendent so Lead Plaintiff could work on securing other projects to grow company sales while Steele worked days with M.A. Mortenson personnel (Thomas Grinna, Project Superintendent, among others) and Alliance's night crew supervisor Robert Hintz to meet the accelerated schedule. Many years later in September 2023, Steele was a key early identification in the 2023-24 identifications sequence, when he popped into view during a Pennsylvania jail break press conference as Lt. Col. George Bivens, Pennsylvania State Police (LPEE page 12260). This occurred after Lead Plaintiff's first identification in June 2022, when he was able to definitively identify Greg Crossgrove, supposedly a Phoenix area produce industry consultant, was actually Joseph ARPAIO, MARICOPA SHERIFF. These vital early clues and a MSNBC interview background photo behind WEISSMAN (paragraph 422) which included Michael WORTHY (WSU MBA program, (paragraphs 99k, 418, 422, 493, 726, 762 table, 770, 805AG, AK), and a fellow employee as a cashier and stocking clerk while at Larry's Market in 1972,

Federal Way, WA, owned by extended family member Larry Brewer, a cousin of Lead Plaintiff's father), given his distinctive red hair and mustache, were key to the 2023-24 unraveling of the series of personal identifications herein, which led to firm identifications of the federal government department and agency institutional perpetrator defendants.

450. Lead Plaintiff began a search for new employment in mid-1993 as Alliance operations were terminated and the company was forced to close. During this period, CORNWELL (a former Navy carrier pilot turned deep cover CIA agent who had worked espionage operations in north Africa before retiring), now posed as having formed a new venture, as CEO of an environmental services company, P.A.N. Environmental Services Corporation (PAN), by using a publicly traded shell corporation to work toward securing a form of financing known as a PIPE (private investment in public equity), which allowed private funds to be invested in public stock, which in turn was to be listed on NASDAQ to provide investor liquidity without the need to go through the SEC registration process. CORNWELL promised Lead Plaintiff compensation as soon as a financing was completed with Credit Lyonnaise Laing (CLL), a major French investment bank and stock broking firm with offices in London, so Lead Plaintiff agreed. He had no knowledge that he remained the effective captive and involuntary servant of defendant UNITED STATES (CIA, ARMY, FBI, USMS), and its continuing illegal BRMT bioweapon and bioweapon system, constitutional rights, and associated-in-fact enterprise racketeering conspiracy.

451. Lead Plaintiff made three trips to London to meet with Credit Lyonnaise Laing Managing Director Michael Kurtanjek (MI-6, UK's CIA equivalent) regarding financing, returning from London Heathrow to Seattle, WA on Feb 8, 1994, and on March 11, 1994 according to CPB port of entry encounter records at LPEE page 540. A third return to La Guardia

Airport, New York is not recorded in CPB records during that 1994 time period. The promised CLL financing failed in Spring 1994. The entire alleged financing was simply a corrupt lie used to extend Lead Plaintiff's involuntary servitude, forced labor, and peonage by engaging (a) MI-6 (through Kurtanjek, who used his CLL international Managing Director mining industry commercial cover for projects in Africa and elsewhere), (b) MI-5 (UK's FBI equivalent), and (c) the London Metropolitan Police, which exposure included a five man Counterterror squad trotby while Lead Plaintiff was alone in a 500 foot long construction tunnel at Heathrow Airport, and the Serious Fraud squad as a result of a hotel bill on the Copthorne Tara, Kensington, hotel room number which remained unpaid by CORNWELL for a time which was sufficient to attract their attention. Lead Plaintiff could then be subjected to UK technical surveillance as before, see the prior UK/US national security event Queen Elizabeth II's 1983 visit to Seattle at paragraphs 211, 600 NSEC-1, 623B RGTS-3, 679B RICO-41 for a prior example, and could be again due to a pretexted defendant ESTABLISH trip to London in September 2007 paragraph 603 NSEC-4. CORNWELL and FBI also ran a \$165,000 fraudulent factoring theft on a Pacific Environmental Services (the P. in P.A.N.) sub-soil remediation or paving project during this sequence in mid 1994, echoing the prior \$20,000 factoring loan which had been used for the fraudulent Canadian financing, the subsequent \$65,000 loan default, and the forced November 1993 bankruptcy which had been discharged by the Federal Bankruptcy Court just a few months before. Lead Plaintiff never received any of the compensation due for his work at PAN. He did subsequently rebuild his personal credit to a 775 FICO score (practical scale maximum score 830) despite these defendant UNITED STATES thefts and frauds, before it would be wrecked again in late 2005.

- 452. In the meantime, ROSENBERG (FBI), as the NutraSource CEO in Seattle, WA, had remained in contact with, then directly reengaged the Lead Plaintiff, requesting that Lead Plaintiff conduct NutraSource strategic planning sessions with the management team, and provide other consulting services during this period.
- 453. Adding to the stress of the December 1993 personal bankruptcy borne out of corrupt federal police powers operations which financially wrecked Alliance (paragraph 649 RICO-11), Lead Plaintiff, his second wife Jeanette, and stepson Bryce, were deprived of Lead Plaintiff's earning power by defendant UNITED STATES' corrupt police powers operations continuously from Summer 1990 through Fall 1994.
- 454. During a period of forced uncompensated employment (Alliance, then PAN), paragraph 652, 653 RICO-14, 15), then unemployment with minimal consulting income from NutraSource from July/August 1990 to July/August 1995, defendant ROSENBERG human trafficked Lead Plaintiff to the Pacific Pipeline Board of Directors (Appendix 2 paragraph 1-018, 1-019) in Spring 1994, and then to employment as its COO in Summer 1995. Pacific Pipeline was a book distributor used by defendant FBI for spying on and wrecking (a) targeted book retailers by (i) deliberately misfilling and short-filling their orders, by (ii) deliberately constricting credit during critical selling periods, by (iii) directly misbilling issues and (b) self-publishers by (i) soliciting consignment of books that would fail to sell through and then (ii) returning those self-published consignment inventories while Pacific Pipeline operated, then (iii) by seizure of these consigned self-published inventories as Pacific Pipeline went into bankruptcy after a programmed ERP implementation meltdown in 1995-96 orchestrated by a former Arthur Andersen Consulting information technology embed, most probably defendant FBI. Pacific Pipeline was run by Vito PERILLO, its ostensible founder and shareholder. Lead Plaintiff joined

defendant ROSENBERG and Phil LALJI (CEO, Kit's Cameras) on the Board of Directors in 1994 and became COO succeeding Dennis last name not recollected (then the recently previous COO of Egghead Software under Alhadeff) in Summer 1995. Lead Plaintiff was later joined by CHRISTENSEN and PRAY as co-workers, who came from their prior employment at NutraSource (where they had worked with ROSENBERG). The new information technology ERP system referenced above was acquired in 1995 before Lead Plaintiff joined the management team as COO, was then supposedly customized to the operation, and went live in September 1995 over Lead Plaintiff's firmly expressed private objections (and with no access allowed by PERILLO or the VP-Information Technology to review the implementation configuration customization and testing process) just before the critical Christmas selling season for book retailers got underway in Fall 1995. The implementation was a disaster from the start, with malfunctioning software and an overheated minicomputer whose motherboards had to be partially replaced due to grossly inadequate air cooling in the closed office it was placed in. This deliberately sabotaged ERP implementation severely compromised order fulfillment to retailers throughout the critical Christmas sales period, damaging the finances of many small independent bookstores, and severely degrading company finances for those retailers and for Pacific Pipeline. This implementation disaster also forced added labor, dramatically increased shipping and invoicing errors, delayed company cash flow, and forced a company bank loan default, which brought a special credits loan officer from US Bank, Kim EPSKAMP.

455. Kim EPSKAMP was US Bank workout officer assigned to Pacific Pipeline from Portland, OR. He had attended the WSU MBA program at the same time as the Lead Plaintiff (they had gone upland bird hunting in the Palouse together while in graduate school.) As it turned out, this same "problem" had been experienced by Pacific Pipeline in previous Christmas

selling seasons. This set of tactics was an element of on-going defendant FBI illegal spying and business wrecking operations carried on in the region, and most probably nationwide, which targeted specific independent booksellers and self-publishers for financial damage to their private enterprises, just as defendant FBI had done during Cointelpro from the 1950 into the 1970s. This credit workout was underway by Spring 1995.

456. During the final stages of the ERP cleanup, PERILLO suggested that the company return to the old software system which had failed in prior Christmas and had led to the disastrous Fall 1995 implementation. Lead Plaintiff rejected the idea, attempted to buy out PERILLO's interest, then was terminated without cause, soon after the ERP software implementation disaster was cleaned up and operating properly in Spring 1996. About two months after his Spring 1996 termination from \$125,000 base compensation job as COO, Lead Plaintiff received a call from New York City. PRAY reported that he had just witnessed PERILLO fire the company's biggest customer, Barnes and Noble, in a meeting at its headquarters in NYC. Having lost about half its sales, Pacific Pipeline then slid into financial distress and bankruptcy as it dissolved into a financial wreck due to lack of sales. The records of this malign FBI spying and small business bookseller targeted wrecking operation then disappeared with the bankruptcy so the truth of the targeted private enterprises financial wrecking process run against the small book retailers and self-publishers would be destroyed. Pacific Pipeline was liquidated by CHRISTENSEN working for the bankruptcy court trustee. PERILLO reportedly then formed another book distribution company named Koen Pacific, with a Pennsylvania book wholesaler Koen as lead investor.

457. Lead Plaintiff was then human trafficked after extended unemployment, lasting about six months, into a CNA hourly consulting sales opportunity at Henry Schein, a medical

supplies wholesaler in Port Washington, NY, with HADJINIAN and LINS, which Schein did not pursue. In November 1996, Lead Plaintiff was asked to join his next orchestrated employment at CNA Industrial Engineering full time (Appendix 2 paragraphs 1-018 through 1-026) at a much reduced salary of \$88,000 (down from his prior \$125,000 base salary at Pacific Pipeline) joining FAUCI, (posing as Larry R. Cook, NIAID Director and allegedly CNA's founder and owner), HADJINIAN, LINS, LOWBER. CNA (Appendix 2 paragraphs 1-013, 1-014) had been previously and was used (unknown to unwitting Lead Plaintiff until forensically reverse engineered between 2021-2023) in other DOJ spying (defendants FBI, USMS) against Japanese entertainment games companies (Sega, Sony, Nintendo) as they entered the United States, in the engineering design of the Oracle software distribution center (to track Oracle database software shipments to be able to identify Oracle's customer base for future spying), on Boeing civil aircraft and military projects, Hughes NRO and NSA satellite projects, among other legal and illegal intelligence acquisition, domestic spying, and national security projects (paragraph 602 NSEC-3).

458. Lead Plaintiff initially worked on a series of CNA distribution automation projects for Sony, Springfield, OR, then CUC, Torrance, CA. The CUC project featured an Accu-Sort sorter requested by CUC SVP John GOODMAN, which was repeatedly sabotaged after installation during implementation and acceptance testing by surreptitious defendant FBI or USMS "telephonic support" after each system tune-up by Accu-Sort technicians, to the point where it failed the acceptance test after extended efforts by Lead Plaintiff, keeping him away from his Kirkland, WA family in Torrance, CA over many months. Lead Plaintiff spent most of those months trying to troubleshoot the Accu-Sort sorter and the flawed order fulfillment software (which cubing and fulfillment software almost worked most of the time), which

software had been developed by a team run by PRAY. The entire system was ultimately "rejected" (by pre-design) on this fraudulent CUC project, a lawsuit was filed, and Los Angeles, CA state court ordered arbitration of this fraudulent failed project, one in the long series of abuses of state and federal courts by defendants FBI, DOJ, and USMS, paragraphs 626, 627 RGTS-6-7.

459. This failed CUC project and subsequent litigation was one of many such sabotage sequences of unwitting Lead Plaintiff over his many years of his involuntary servitude before his income was completely cut off in 2002, then after human trafficking was briefly allowed for ten months in 2007-2008 at ESTABLISH (ROSENBERG, FBI) in another in the sequence of programmed destructions by FBI, USMS, CIA and ARMY in northern New Jersey, with coconspirators including, without limitation, numerous police powers operations in the region, as well as corporate, press, and community interests. These persistent acts, violations, and injuries violate, without limitation, 18 USC §§ 175, 241, 242, 793, 798, 1029, 1030, 1037, 1038, 1039, 1341, 1342, 1343, 1349, 1581, 1584, 1589, 1590, 1593A, 1961-1968.

460. In 1998, Lead Plaintiff was selected to replace HADJINIAN (previously a defendant CIA affiliated native asset during the Samoza regime in Nicaragua until that family dictatorship ended in 1979), after (a) CNA was deliberately overstaffed and about \$400,000 of bogus receivables remained uncollected and had to be written off, and (b) a disastrous distribution software development project at Titleist run by Tim Auld came unraveled and was cancelled after (c) a failed software implementation rescue attempt by COOK, HADJINIAN, and PRAY. Lead Plaintiff was forced to lay off many CNA engineering and IT team members to shrink the payroll to match revenues. This overstaffing pattern is used to facilitate the appearance of unemployment and job searches by those laid off but who are actually redeployments of undercover police

powers and intelligence personnel to new embedded roles in various private organizations including, without limitation, as known to Lead Plaintiff, Starbucks, Navajo Farming Industries, Titleist, real estate agent covers, headhunter covers, and other illegal cover company operations. Soon after taking over CNA, Lead Plaintiff modified customer contracting terms to regain profitability. He worked through the national security project Boeing/Air Force Delta IV rocket factory engineering design and implementation, Anchorage Airport baggage systems, Sea-Tac Airport baggage systems, Port of Seattle engineering specifications rewrite, Nikken fulfillment center design and procurement, HomeGrocer fulfillment center design and implementation, Media Arts Group production and fulfillment center, among other engineering and information technology projects (that these projects were used for illegal domestic spying was still unrecognized by the unwitting Lead Plaintiff). He was joined around 1999-2000 for about six months by AUSTIN in civilian dress at CNA Industrial Engineering during a series of distribution center automation design projects for HomeGrocer, a Bellevue, WA based internet home delivery grocery company.

461. In Summer 2001, Lead Plaintiff began work to secure an engineering subcontract to Berger Abam, Federal Way, WA, at Puget Sound Naval Shipyard (PSNS), related to a seismic retrofit of dockside industrial area shop buildings. This project was delayed until Spring 2002 by the 9/11/2001 attack. As the project was scheduled to resume, he was informed that \$100,000 of working capital required to complete the PSNS project had been stripped from the company by FAUCI (Larry R. Cook, supposed CNA founder and CEO). He resigned with PRAY to form Allegent, LLC in September 2002, not realizing PRAY was and always had been an embedded agent of defendant UNITED STATES.

Illegal Human Trafficking In Involuntary Servitude: Lead Plaintiff's Professional Life-Programmed Employment, Unemployment, Enterprise Wrecking, Homelessness 2002-2008

462. Lead Plaintiff's 2002 private business startup, Allegent LLC dba Performa (with PRAY as fraudulent "business partner,") was wrecked by defendant FBI (ROSENBERG) using ShipNow check fraud and defendant TSL sales fraud between 2002-2004 (paragraph 516, 517, 602 NSEC-3, 610 HEXP-7, 650 RICO-12, 673 RICO-35, Appenidx 2 paragraphs 1-027 through 1-029) to coerce and traffick Lead Plaintiff out of Washington state using financial wrecking and illegal psychological coercion biochemically magnified by illegal BRMT bioweapon and bioweapon delivery system manipulated fear and suicide ideation (paragraph 604 HEXP-1). Defendant UNITED STATES accomplished obstruction of justice through this trafficking as the pattern evidence in decades of his medical records, bank records, and other vital evidence of criminal acts by and under defendant DOJ agencies FBI and USMS involuntary servitude, and by defendant CIA and ARMY bioweapon and bioweapon delivery system illegal human medical experimentation without consent evidence. These records were destroyed in the years after his trafficking by the passage of time and by terminating his on-going relationships with medical and legal professionals, financial institutions, and others. A medical records request to his long-time physician was ignored or intercepted in the US Mail. Other Electronic records from the late 1990s (personal) and from about 2002 (Allegent, LLC dba Performa) which ran through the 2005 trafficking and the early months of 2006 in Boston, MA before Spring 2006 homelessness were stored on a personal laptop as the hard drive was destroyed either by being transported in a rolling suitcase as it was being relocated in about 2006, or by a technical hack which caused that appearance, while homeless in Boston (Appendix 2 paragraph 1-029), but the hard disc drive was recovered in September 2007 and sent to a lab (likely an undercover FBI or USMS lab address).

A complete copy of the hard drive contents was handed to defendant ROSENBERG (aka William Drumm, General Manager) at defendant ESTABLISH by Lead Plaintiff in about October 2007. Production of these records by defendants FBI, ESTABLISH, or by the cover company data recovery lab itself, will yield substantial additional evidentiary matter and support these and further claims against defendants.

463. Harvard President Larry SUMMERS (fka Roger PENNER, paragraph 428) conspired with FBI (ROSENBERG) to human traffick Lead Plaintiff to Boston during 2005 using a popular physics book ostensibly written by Harvard physics professor Lisa Randall, who appeared on the front cover of Scientific American magazine while supposedly promoting her book was the female bait, as Lead Plaintiff was trying to determine where to flee after being financially wrecked out of his 149th Street Kirkland, WA residence to an apartment complex between 124th Avenue NE and Slater Road NE, north of 85th Street in Kirkland, WA. No one in the apartment complex apparently needed to work as the parking lot was almost completely filled with cars both day and night. Lead Plaintiff feared, at the time, but had no facts at the time to support, federal police powers attempts to illegally entrap family members which could enable corrupt police powers personnel to use their coercion of family members to reach him for reasons he simply did not understand at all. He left his sister's home in Edgewood, WA on December 24, 2005 to travel to Boston, after being informed he could not remain there in a basement bedroom adjacent to his Aunt Joanne's apartment (the role was played by a media cutout who appeared instead of his actual aunt) in the Sumner, WA area residence owned by his sister and her husband. Twenty-one months of homelessness in Boston, MA ensued, first at a hotel near the Wonderland MBTA station for about four months until funds ran out, then at Pine Street Inn and in a Catholic Church basement satellite shelter in Boston, MA, for seventeen

months. He diligently searched for work each week and was systematically blocked from access to legitimate employment options by defendant USMS or FBI technical hacks at a job search center in Boston.

464. An interview with an Israeli-owned consulting firm in a western suburb of Boston was arranged in Spring 2007, actually most probably a Mossad counter-terror intelligence officer interview arranged by ROSENBERG (FBI) to manufacture a false terror legend narrative which FBI then fed to NYPD and others on the regional Joint Terrorism Task Forces in northern NJ and NYC. Lead Plaintiff was also contacted by a Pittsburgh, PA area technology trade association regarding a trade association executive position which did not result in an in-person interview (likely actually a defendant FBI fraudulent telephone interview), and by a Pittsburgh, PA area executive recruiter Joe McKeon (FBI), MRI Executive Solutions. An in-person interview with William Drumm (defendant ROSENBERG again, this time without the Seattle, WA toupee) and others at defendant ESTABLISH was orchestrated and Lead Plaintiff was again human trafficked, this time to Fort Lee, New Jersey in August 2007 by defendant FBI's ROSENBERG for further involuntary servitude and forced labor at defendant ESTABLISH (Appendix 2 paragraph 1-031).

465. Sefendant ROSENBERG (FBI), Lead Plainitff's principal human trafficker from his roles at NutraSource as CEO in the 1980s and Pacific Pipeline as a fellow Board member in the 1990s) reappeared in person in Summer 2007 in this new role of William Drumm, the General Manager of defendant ESTABLISH in Fort Lee, NJ. This went completely unrecognized by the unwitting Lead Plaintiff until late 2023. Cover names MCDONALD, PREGNER, KOVONUK, ROSS, PANKOWSKI, posing as co-workers, and Hakkan ANDERSEN (a media and entertainment industry employee) posing as the Swedish parent company's Managing Partner for

global consulting services, joined in this fraudulent scheme, including at a week-long London, UK, company international business conference in September 2007.



July 25, 2007

Mr. Dennis Brewer P.O. Box 180190 Boston, MA 02118

Dear Dennis:

Thank you for making the time to meet with us at our offices. We enjoyed discussing our plans for the future of our firm, and your career. We believe that you have much to offer and will be an excellent addition to our firm. Specifically, your experience in supply chain management consulting qualifies you for this position.

To confirm our employment offer, we would like you to join our professional staff full time in the position of Vice President, at an annual salary of \$140,000, payable semimonthly. Your responsibilities will include marketing and sales of client projects — both independently and as a member of our team, leading projects that you sell, internal administrative tasks such as scheduling and staffing, and working on billable projects. Acceptance of this offer indicates that you understand that you will be working for our company exclusively.

You may participate in the firm's regular major medical plan and group life insurance policy. There is a contribution amount paid per employee depending on the coverage type, while the firm pays the majority of the cost. We also have an excellent 401(K) program administered by Paychex, an employment payroll service.

You will be eligible to earn a 4 percent commission on work that you sell. We use a team selling effort for many of our projects. This means that in addition to your individual sales activities, we will involve you in sales along with others in the firm. If you sell work totally on your own, the commission will be 4 percent of the billable work. If you sell the work in a team effort, then you will earn a percentage of the 4 percent commission based on your participation in the sale. This commission will be paid quarterly on the basis of billable work during that time on projects that you sold or participated in selling.

You will be eligible for up to a 10 percent bonus for overall performance including billings, team building, cooperation, and contribution to profit.

You will qualify for 15 days of vacation during the first 12 months of employment, and 20 days per 12 months following that. We do not automatically earn personal or sick days. Obviously, if you are sick, we expect you to stay home and seek medical attention; this does not come out of your vacation days.

Excerpt: ROSENBERG (FBI, William Drumm) Signed ESTABLISH Offer Letter - LPEE pages 797-798

466. After ten months of fraudulent employment by this defendant DOJ/USMS/FBI cover company which operated in manner similar to prior cover companies, Lead Plaintiff was

terminated from defendant ESTABLISH in June 2008 by an associate of defendant ROSENBERG, Conrad ROSS, about three months after the staged "termination" of Drumm (ROSENBERG), and a few weeks after being "requested" to make an impossible \$25,000 investment in defendant ESTABLISH that these DOJ and agency personnel knew he could not possibly make (Appendix 2 paragraph 1-032). A fraudulent female relationship which was orchestrated in 2008 with MODDERMAN (paragraph 611) was also terminated at this time to maximize personal stress and distress on the Lead Plaintiff, a practice he now recognizes as customary federal defendant police powers tradecraft. Defendants NYPD, PAPD, NJTPD, NJSP, and other defendants in the northern NJ/NYC region, had joined in the conspiracy in August 2007 and in the months thereafter, conspiring in the bad faith acts which comprised the ongoing police powers associated-in-fact racketeering enterprise and conspiracy against rights described in the 110 specific subcounts at paragraphs 600-710 as they conducted their own prejudicial police powers operations, which coercive operations have and do continue.

467. During his forensic review in October 2023, Lead Plaintiff noted three possible encounters with a former FBI Director Robert Mueller morphological comparable, most recently while at defendant ESTABLISH. This is subject to confirmation during the discovery process. The first possible interaction noted during the forensic review was in Spokane at the Sackville-West residence as the fiancé of Karen, one of the Sackville-West children in the 1970s while Stephen BREYER was known to Lead Plaintiff as Jack Sackville-West (BREYER), and the parent of Karen and Bill, who posed as Lead Plaintiff's college friend at defendant WSU. Lead Plaintiff's limited contact with this individual in the 1970s, then known as Karen Sackville-West's (other identities at paragraph 717) fiancé "Denny," is too vague to be determinative regarding Mueller.

468. The second probable encounter was at Pacific Pipeline, a book wholesaler and defendant DOJ/USMS/FBI domestic spying operation in Kent, Washington used against Pacific Northwest retail bookstores in the mid-1990s while that individual appeared from time to time, probably Mueller at times but not at all times, posing as its Vice President - Sales.

469. The third (very probably Mueller) encounter occurred during Lead Plaintiff's fraudulent employment at defendant ESTABLISH, while consulting on a fraudulent software selection project which defendant FBI orchestrated in 2007-2008 at PPG Headquarters in Pittsburgh, PA, in its Paint and Coatings Division. That individual was slated to become the new senior corporate officer for global operations in the Paint and Coatings Division. That division, which is now 100% of sales since the glass business was completely sold off beginning in 2008, was supposedly being moved out of the downtown Pittsburgh PPG headquarters to a suburban location, a very unlikely sequence given the size and importance of that division to PPG and its longer-term importance. Defendant ROSENBERG accompanied Lead Plaintiff to a floor where the SVP (Mueller) ostensibly had an office on the one trip to PPG in Pittsburgh which defendant ROSENBERG made to accompany the Lead Plaintiff from the Fort Lee, NJ office they shared at defendant ESTABLISH. There were no other people on the upper PPG Headquarters office floor, now recognized as a trademark form of tradecraft experienced in other defendant FBI operations to avoid having other witnesses in the area, such as in the fraudulent 20 or so sales lead visits to various plants and offices during the sales starve-out sequence which was an element of these defendants' wrecking of Allegent, LLC dba Performa in 2003-2004 (paragraph 673 RICO-35), which was primarily undertaken by defendants DOJ, FBI, and TSL to orchestrate Lead Plaintiffs trafficking through Boston and then on to fraudulent employment by defendant ROSENBERG (FBI) at defendant ESTABLISH in Fort Lee, NJ in 2007.

470. This likely fraudulent PPG project interaction with Mueller (whose cover name at PPG is not recalled) was most probably a final defendant FBI backcheck for their internal security purposes. Thereafter, defendant UNITED STATES and its co-conspirators, having detached the Lead Plaintiff from his tell-tale medical records in Washington state (which would later be routinely destroyed with the passage of time after they were not transferred to New Jersey as requested by mail by the Lead Plaintiff in late 2007), and from his financial and other records of their associated-in-fact enterprise run with their co-conspirator defendants in Washington state and Boston, MA, could proceed with the next phase of their planned operation.

Illegal Human Trafficking In Involuntary Servitude: Lead Plaintiff's Professional Life-Since ESTABLISH (FBI, ROSENBERG) Termination 2008-2024

- 471. Essentially, defendant UNITED STATES and its racketeering co-conspirators intended this human trafficking as the final trip this time to northern New Jersey and the garbage disposal. No employment has been allowed since June 2008, while various frauds and thefts by alternate means have continued including, without limitation:
 - (i) compensation thefts by involuntary servitude employers, including, without limitation,CNA and ESTABLISH,
 - (ii) forced compromises of legally due sums to various businesses owned or managed, including, without limitation, Alliance (from the asset purchase of Steve's Maintenance, FBI) Allegent, LLC dba Performa (ShipNow, FBI), and Cliffside Park, NJ and Ramsey, NJ apartment renovations (USMS), including labor, materials, equipment, and rental equipment costs and expenses,
 - (iii) deprivation of benefits, including, without limitation, access to SBA performance bonding and loan guarantees at Alliance,

- (iv) undue forced litigation expenses, including, without limitation, at LazerSoft, Alliance, PAN, CNA, Allegent, Winnett,
- (v) orchestrated commercial loan and factor loan defaults leading to personal bankruptcy, credit destruction, and high priced credit at Alliance, PAN, CNA, Allegent, ESTABLISH, wherein each and all these frauds and thefts perpetrated and permitted by these defendants, through their acts and failures to act, have cost the Lead Plaintiff (a) literally millions of dollars in lost revenue and profit at his commercial enterprises while engaged and attempting to engage in good faith, in in-state, interstate, and international commerce, (b) in the low millions of dollars in personal income over his active twenty year career, including during multiple periods of forced unemployment, (c) further millions of dollars of compensation lost to forced unemployment and further destruction of commercial enterprises engaged in interstate commerce from 2002-2007 and again from 2008 to the present, and through, without limitation, (d) disparagement, defamation, loss of reputation, harassment, and rights violations by defendant UNITED STATES, by other police powers defendants, by individual defendants, and by various other interests to be identified through the discovery process.
- 472. Further, the Lead Plaintiff was first human trafficked at age 12 in 1968, then comprehensively abused in involuntary servitude by defendant UNITED STATES from at least 1979, which has, at all times, limited his income and income potential, access to capital from actual investors rather than fraudulent government "investors" for the corrupt purposes of perpetrating frauds and imposing entrapment operations on the Lead Plaintiff, caused and created repeated continuity of employment issues, eliminated access to actual authentic fair market compensation, and eliminated other career and business opportunities which are legally available to all US persons under law, while accelerating the frequency and intensity of lethality attempt

against him. No employment of any kind has been permitted to Lead Plaintiff by defendants since 2002, except for ten months of fraudulent employment at ESTABLISH in New Jersey in 2007-2008. Lead Plaintiff suffered torture and loss of benefits and income to another USMS fraud by CHALOM between 2008-2010 (paragraph 642 RICO-4), attempted to access the courts for redress and was forced from his Cliffside Park residence in October 2010, thwarting his attempt as redress through imposed duress (paragraph 512, 522, 606 HEXP-3g), then relocated through a hospital (paragraph 606 HEXP-3 subparagraphs I through L) in Paramus used to civilly confine and pressure Lead Plaintiff to drop a federal court complaint under duress to Ramsey, NJ in 2011. This 2008-2011 period is described in detail later in this Complaint at paragraph 606 HEXP-3.

473. Unable to secure any employment since June 2008, even as a ShopRite night stocking clerk in Ramsey, NJ around 2012, when interfered by police powers from employment there as a night stocking clerk, most likely by a defendant USMS undercover officer posing as a female Assistant Store Director, Lead Plaintiff attempted to start several commercial enterprises in interstate commerce. Defendants have and do employ mail fraud, wire fraud, contract fraud, material misrepresentations, and other acts, violations, and injuries to preclude all further employment and private enterprise, forcing the Lead Plaintiff to exhaust the five year limit on public assistance in 2016 and then to live on Social Security retirement benefits from late 2017.

474. Lead Plaintiff's attempts from 2011 into 2022 to start a business were continuously thwarted by police powers operations (at all levels of government), and used to destroy Bank of America DDA (checking) accounts (which are actually shadow accounts maintained by defendant UNITED STATES secretly and in parallel with the actual private sector banking system by using the names of recognized financial institutions) in Summer 2015 (paragraph 656)

RICO-18, LPEEV65-6, 7), which account monthly statements held the clear evidence of prior associated-in-fact enterprise pattern of criminal racketeering acts by police powers, including the thefts of compensation at defendant ESTABLISH in 2008 by defendant ROSENBERG and ROSS (paragraph 641 RICO-3), and the theft of materials, labor, improvements, tools, and personal property by defendant CHALOM at the 282 Palisade Avenue, Cliffside Park, NJ apartment in 2008-2010 where Lead Plaintiff improved his residence at the request of "landlord" Marc CHALOM (USMS) and was not paid in full (642 RICO-4). FBI or USMS used this same technique to cause the Lead Plaintiff to close long-running Wells Fargo DDA accounts in late 2022, and to force the opening of new accounts in several fraudulent banking cover company financial institutions in 2022 and early 2023 in their attempt to repeat this pattern of eventual evidence destruction of banking records of inactive and closed accounts, but those Wells Fargo records and other banking records are partially preserved for use at trial.

475. Lead Plaintiff has pursued interstate and international commercial business opportunities using startup corporations Winnett Perico, Inc. (Winnett herein, incorporated in CO in 2011, no longer registered), Sheldon Beef, Inc. (Interline Exhibit 12, NJ, incorporated in 2020), GPR, Inc. Gannett Peak Ranch (OR, incorporated in 2021). The intent was, and subject to resolution of this litigation is, to raise financing and conduct commercial organic vegetable production (2011-2018), organic beef production (2011 to present), and engage in international trading of beef products to China, Korea, and other countries (2018-2021). This series of food companies which Lead Plaintiff tried to open and finance beginning in 2011 and continuing through 2021, were promised funding and/or promised sales contracts by various defendant FBI cover companies, investment banks, venture capitalists, brokers, and/or other cooperating police powers cover entities (paragraphs 653-672 RICO-16-34, 674-680 RICO-36-42, Interline Exhibits

6, 7, LPEEV65-8), and promised sales opportunities and contracts by use of private companies facilities and personnel including, without limitation, ALBERT'S ORGANICS, COSTCO, WALMART (Interline Exhibits 9-10), and KROGER (Interline Exhibit 8), as well as through defendant FBI and other police powers cover operations. These companies have been funded both by personal funds and by secret police powers investments (paragraph 658 RICO-20, Interline Exhibit 6), but to date all attempts at interstate commerce have been destroyed by these defendants interferences in that attempted interstate commerce. This includes, without limitation, the fraudulent FBI investments below, which are examples of (i) these repeated defendant FBI fraudulent interferences with interstate commerce (18 U.S.C. §§ 1961-1968) and of (ii) defendant UNITED STATES and other police powers, whose personnel are embedded at senior levels in private organizations, including, without limitation, private companies, cooperatives, and credit unions; as well as other commercial and private interests pursuing specific agendas; all while engaging in racketeering acts, violations, and injuries to Lead Plaintiff and other members of the class.

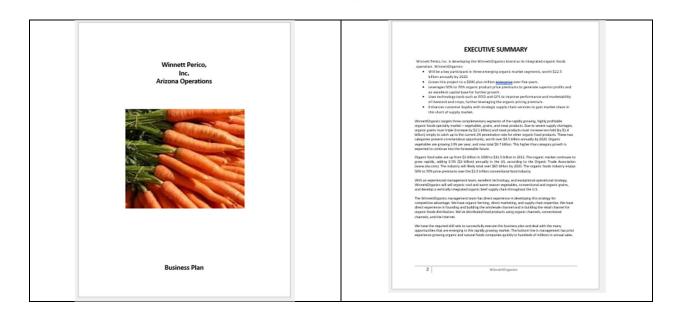
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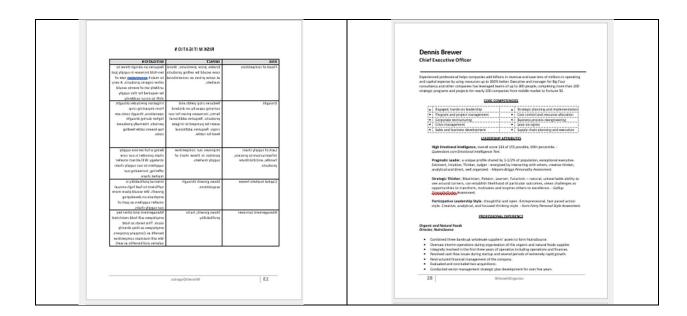
Interline Exhibit 4: Winnett-FBI, Other Defendant Interferences In Interstate Commerce

From: g Subject: Re: Offer - VP Finance and Administration Date: Fri, 28 Aug 2015 13:08:02-0600 To: Dennis Brewer Hi Dennis: I am very excited about your offer. I do have some questions which I have summarized below. I want to clarify the estimated start date to be November 1, 2016 which is subject to completion of the private placement. Assuming it is 2016, would you need my help over the next year in securing the private placement in addition to using my resume? Also during that time, would you like my help in hiring my direct reports? Would you please specify what my involvement would be until the private placement is finalized, and would there be I also wonder what your timing is for my response? As we discussed, I am leaving on vacation tomorrow. And due to what appears to be a contingency situation, I would like to discuss this with my legal counsel. Again thank you for the fantastic opportunity, and I look forward to working with you! Best Regards, Paul Paul Smith 255 Barcelona Drive Boulder, CO 80303 Mobile: (303) 601-6333 Email: On Aug 28, 2015, at 11:44 AM, Dennis Brewer

I am very pleased to offer you the position of Vice President of Finance and Administration.

Your key responsibilities are finance, accounting, pricing, human resources, procurement, and information technology. You will serve as a member of the Company's Executive Committee.





 From:
 Michael Castro
 @yahoo.com>

 Sent:
 Friday, August 28, 2015 4:31 PM

 To:
 Dennis_Brewe

 Subject:
 Re: Offer - VP Operations

Dennis,

Thanks for your consideration. I agree that I would prefer a definite resolution as soon as possible. I will curtail any new efforts to seek employment to allow time for you to move forward with the meetings, and I look forward to hearing from you next week.

Mike

Michael L Castro Tel. 619-8 skype

Re: Backlog



Dean T. Smith <dean@whitewolfproperties.com>
To Dennis_Brewer@winnettorganics.com

Through our Self Directed IRA the way we will apply shall be:

Dean Smith

Funded by/through and dividend receiving will be:

Preferred Trust Company, LLC fbo Dean Smith 404000191 Traditional IRA

Diana Smith

Preferred Trust Company, LLC fbo Diana Smith 404000192 Traditional IRA

Each will be separate investments and entities.

Thank you for getting this information to me tonight, greatly appreciated!

Dean

RE: Please Vote



Doug Petersen < DPetersen@wcu.com >
To Dennis_Brewer@winnettorganics.com; Dean T. Smith



Yes, I think this is appropriate. Doug

From: Dennis Brewer [mailto:dsbrewer923@hotmail.com]

Sent: Wednesday, September 16, 2015 8:39 AM

To: Dean T. Smith; Doug Petersen

Subject: Please Vote

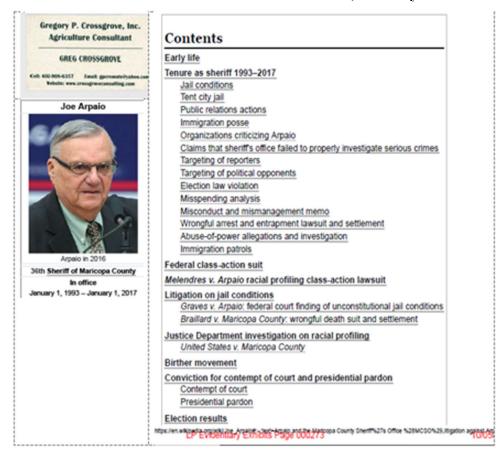
Our investment banker has advised us to do a six for one split of the common shares and sell those shares for \$5.50. This means that your cost basis in common shares , when converted, is \$1.67. So, your investment has more than tripled to date.

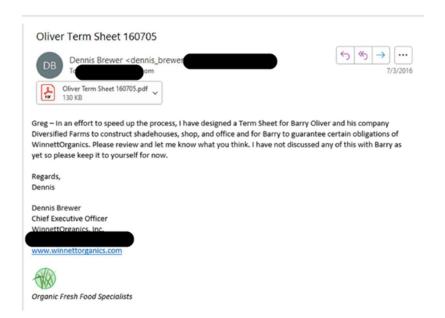
We also need to increase the number of common shares authorized to 40 million, doubling the total number of common shares authorized. Since your shares vote, please indicate whether you vote YES to authorize the additional common shares or NO to decline to authorize the additional common shares.

Regards, Dennis

Dennis Brewer

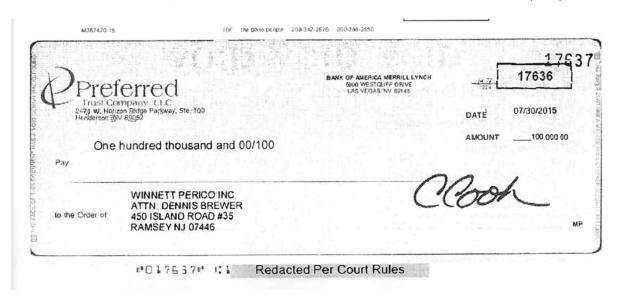
Interline Exhibit 5: Winnett Interstate Commerce Interferences - "Produce Consultant Crossgrove" is Defendant MARICOPA SHERIFF ARPAIO, officially and individually





476. About \$200,000 of FBI agency funds were secretly invested in Winnett in their 2015-2109 entrapment attempt series against Lead Plaintiff, with defendants DOJ and FBI's CASTRO, PAUL SMITH, BLITCH, WASEMAN, and CANCHOLA, Daniel KREWSON (Daniel Goldman, SDNY, MULTIFUNDING), among others (paragraphs 658, 659, 670 RICO-20, 21, 32), and which also inculpated defendant ARPAIO (Interline Exhibit 5). These FBI funds were then effectively recycled through other undercover entities which interfered with interstate commerce, while these funds were being expended in good faith by Lead Plaintiff intending to raise additional funds and accomplish interstate commerce including, without limitation, interferences by ADAMSON BROTHERS, INSIGHT NETWORK, CORNHUSKER CAPITAL, as further described at paragraphs 644, 658, 660, 665, 668, 671, 672 RICO-6, 20, 22, 27, 30, 33, 34, all in perpetuation of the illegal BRMT bioweapon and bioweapon system development and deployment, civil and constitutional rights violations, and racketeering acts, including the coverup of the entire associated-in-fact enterprise from inception.

Interline Exhibit 6: \$100,000 From Fraudulent Investor "DEAN T. SMITH" (FBI)



FBI Agency Sourced Funds Used to Seed Finance Winnett Startup

Interline Exhibit 7: Fraudulent Financings: ADAMSON Brothers (FBI) Fraudulent Private Placement Memorandum and SEC S-1 Consume \$40,000, Raise \$0

Name	of Offeree:		
		Come Number	_

WINNETT PERICO, INC. a Colorado Corporation

CONFIDENTIAL PRIVATE OFFERING MEMORANDUM

Shares of Common Stock Price Per Share: \$5.50 Maximum Offering: \$22,000,000 (4,000,000 Shares) Minimum Offering: \$11,000,000 (2,000,000 Shares) Minimum Investment: \$49,500.00 (9,000 Shares)

THESE ARE SPECULATIVE SECURITIES WHICH INVOLVE A HIGH DEGREE OF RISK. ONLY THOSE INVESTORS WHO CAN BEAR THE LOSS OF THEIR ENTIRE INVESTMENT SHOULD INVEST IN THESE SHARES. SEE "RISK FACTORS."

THE SHARES OFFERED HEREBY HAVE NOT BEEN REGISTERED UNDER THE SECURITIES ACT OF 1933, AS AMENDED (THE "ACT"), IN RELIANCE UPON CERTAIN EXEMPTIONS FROM REGISTRATION SET FORTH IN THE ACT. THE SHARES HAVE NOT BEEN REGISTERED WITH ANY STATE SECURITIES AUTHORITIES IN RELIANCE ON EXEMPTIONS FROM SUCH REGISTRATION. IN MAKING AN INVESTMENT DECISION, INVESTORS MUST RELY ON THEIR OWN EXAMINATION OF THE ISSUER AND THE TERMS OF THE OFFERING, INCLUDING THE RISKS INVOLVED. THE SHARES HAVE NOT BEEN RECOMMENDED BY ANY FEDERAL OR STATE SECURITIES COMMISSION OR REGULATORY AUTHORITY. FURTHERMORE, THE FOREGOING AUTHORITIES HAVE NOT CONFIRMED THE ACCURACY OR ADEQUACY OF THIS MEMORANDUM. ANY REPRESENTATION TO THE CONTRARY IS A CRIMINAL OFFENSE. THE SHARES ARE SUBJECT TO RESTRICTIONS ON TRANSFERABILITY AND RESALE AND MAY NOT BE TRANSFERRED OR RESOLD EXCEPT AS PERMITTED PURSUANT TO REGISTRATION THEREUNDER OR EXEMPTION THEREFROM. INVESTORS SHOULD BE AWARE THAT THEY WILL BE REQUIRED TO BEAR THE FINANCIAL RISK OF AN INVESTMENT IN THE SHARES FOR AN INDEFINITE PERIOD OF TIME.

	Sale Price	Selling Commissions ²	Proceed: to Company
Per Share	\$5.50	\$0.55	\$4.95
Minimum	\$11,000,000	\$1,100,000	\$9,900,000
Maximum	\$22,000,000	\$2,200,000	\$19.800,000

Consultant/Founder

ADAMSON BROTHERS CORP The Date of this Memorandum is September 20th, 2015

See also LPEE pages 6095-6223, 8288-9901 for further documents and pages 1076-6094 for emails, all evidence of Defendants' interferences with interstate commerce from 2008 to present. This lack of results while consuming scarce financial resources is completely consistent with other pattern evidence of fraudulent financing activities inside defendants' network control of Lead Plaintiff's personal and professional life, including in interstate commerce in each commercial endeavor, both as an employee and as an entrepreneur.

¹ The Company reserves the right to waive the 2,000,000 Share minimum subscription for any Investor.

² Finders fees consisting of 10% of the gross proceeds from the sale of the Shares in this offering payable to Adamson Brothers Corp. (the "Consultant/Founder").

Interline Exhibit 8: KROGER, DOMINICK Corporate Email Accounts Hide True Identities of Police Powers Defendants' Personnel And Cover Entities

Dennis Brewer

From: Krempel, Jacob A <jacob.krempel@kroger.com>

Sent: Wednesday, October 5, 2016 9:12 AM
To: dennis_brewer@winnettorganics.com

Cc: Merced, Jose F

Subject: FW: Organic Fresh Foods

Hi Dennis-

Jose (Buyer) and myself (Category Manager) handle our Fresh Organic business, and are open the week of November 7th to meet with you. Give us a couple options on date/times that you would prefer and we will get back to you with our availability.

Thanks,

Jake

Jacob Krempel | Produce Category Manager Kroger Co. | 1014 Vine Street Cincinnati OH, 45202

@(office): 513-562-5794 | ⊠(email): <u>Iacob.Krempel@Kroger.com</u>

From: Michael Callahan [mailto:mcallahan@dominickanddickerman.com]

Sent: Thursday, July 7, 2016 1:29 PM

To: Cardone, Andrew <andrew.cardone@ml.com>; Dennis Brewer <dennis brewer@winnettorganics.com>

Cc: Mark Gross <mgross@dominickanddickerman.com>

Subject: RE: Introduction

Thanks Andrew.

Dennis - I am free most of the day tomorrow so let me know what works for you.

Regards,

Michael J Callahan

Managing Director

Investment Banking

Dominick and Dickerman LLC

570 Lexington Ave

Suite 4200

New York, NY 10022

Direct 646 780-8432

Cell 917 930-9490

DOMINICK & DICKERMAN LLC I Member FINRA, SIPC

Interline Exhibit 9: WALMART Winnett Produce Supply Contract Meeting at Bentonville, AR Home Office With McCormick (FBI)

From: Ronald G. McCormick [mailto:Ron.Mccormick@walmart.com]

Sent: Wednesday, January 11, 2017 12:29 PM

To: Ashley Kilgore <Ashley.Kilgore@walmart.com>

Cc: Julia Moore «Julia.Moore@walmart.com»; Dennis Brewer «dennis brewer@winnettorganics.com»; Laura Himes

<Laura.Himes@walmart.com>; Dan Irwin <Daniel.Irwin@walmart.com>

Subject: PLEASE SCHEDULE RE: Winnett Organics Strategic Partnership

Ashley, please send this planner

Title: Winnett Organics Collaboration

Purpose: To consider ways that Walmart and Winnett could work together to increase organic acreage and availability to meet future demand.

Time: 1:00 – 2:30 February 21st

Required: Shawn Baldwin, Ron McCormick, Laura Himes, Dennis Brewer, CEO WinnettOrganics, Inc. (dennis brewer@winnettorganics.com (623) 207-520-549-6245 Optional: Michael Cochran, Mikel Hancock, Yoshie Fuiji, Jeff Thorpe, Victor Velage, and Dan Irwin.

Details:

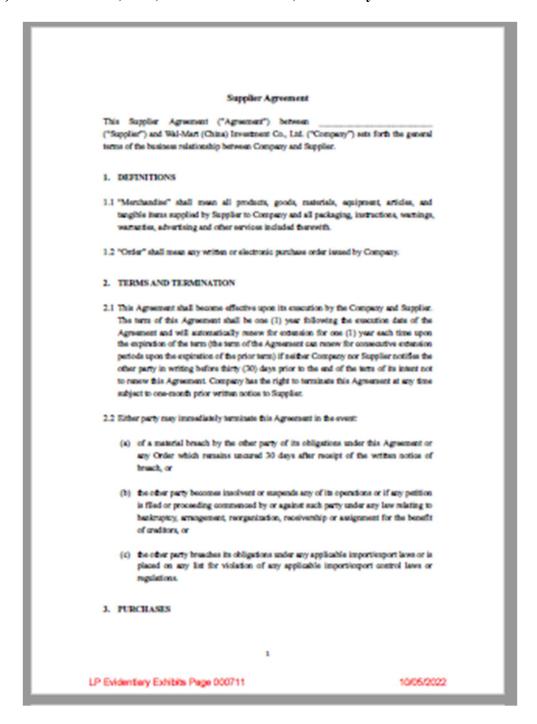
- Dennis may want additional people from his company to join.
- Please schedule a WebEx and meeting room...I believe Dennis is coming in person, but other may wish to call in.
- We will want to show a PowerPoint so an enabled room is needed.
- Don't let the optional attendee's calendars be an issue because this Julia is holding this time on Shawn's calendar.
- Please include the agenda below without the parenthetical notes.

1

Agenda

- Introductions
- WinnettOrganics, Inc. Overview (Updated deck needed from Dennis)
- · How Walmart sources and sells organics.
- Current and potential growing areas (Walmart GDC map with WO, Inc, growing areas added is needed)
- Crop priorities for Walmart and Winnett and where they intercept, and where greatest potential exists.
- Preferred Varieties and Resilient sourcing (need a summary slide if Victor feels we can share)
- Interest and Next Steps

Interline Exhibit 10: Winnett Cattle Company Sales Contract Signed With WALMART (China) Investment Co., Ltd., a WALMART Inc., Subsidiary – Later Cancelled



WALMART contract implementation was dragged out by insider defendants after extensive email discussions and vendor approval was repeatedly delayed until Trump started the China trade war in 2018 and countervailing Chinese tariffs made final point of purchase retail pricing excessive.

Dennis Brewer

From: Yoshiyuki Higaki < Yoshiyuki.Higaki @walmart.com>
Sent: Tuesday, January 9, 2018 10:56 AM
To: 'dennis.

Subject: FW: Next Step- Winnett Organic trial shipment

Attachments: WCC JBS BI Shank 171117.pdf, Walmart 171207 QuotationSheet 6-1.xls

Dennis,

Hi, will you kindly confirm the following 3 points?

Best regards,

Yoshi

From: Alison Fan Sent: Tuesday, January 09, 2018 4:51 AM To: Yoshiyuki Higaki Cc: Ray Zhang(MDSG); Levy Zheng Subject: Next Step- Winnett Organic trial shipment

477. After these programmed racketeering acts affecting interstate commerce were completed, FBI Sacramento then orchestrated a civil lawsuit against the Lead Plaintiff in 2019 (ostensibly brought by individual defendant investor "DEAN T. SMITH") after Lead Plaintiff did not wrongfully use the proceeds of about \$200,000 invested and loaned to Winnett during that enterprise wrecking sequence (see Eastern District of California case 2:19-cv-01918-TLN-DB) but had signed a personal guarantee and was a corporate officer.

Interline Exhibit 11: Lead Plaintiff Sued Individually in Federal Court For Alleged Misuse of Funds Provided By Fraudulent Investor "Dean T. Smith" (FBI)

Case 2:19-cv-01918-TLN-DB	Document 20 Filed 08/12/21 Page 1 of 16			
1 GEOFFREY O. EVERS, SBN 140541 EVERS LAW GROUP, A.P.C. 2 641 Fulton Avenue, Suite 200 Sacramento, CA 95825 T: (916) 974-3000 F: (916) 720-0332 Email: g.evers@everslaw.com				
5 Attorneys for Plaintiff DEAN T. SMITH	and the second s			
6 UNITED	UNITED STATES DISTRICT COURT			
	EASTERN DISTRICT OF CALIFORNIA			
Water State of the	mayor has epologic get ben 110 to 110 to 110 to each at get his transmitted the			
9 DEAN T. SMITH,	Case No. 2:19-cv-01918-TLN-DB			
10 Plaintiff,	NOTICE OF APPLICATION AND APPLICATION FOR ENTRY OF			
12 DENNIS BREWER, an individual domic				
New Jersey; WINNETT PERICO, INC., a corporation, d.b.a. WINNETTORGANIC	S: Time: 10:00 a m			
WINNETTORGANICS, a business entity unknown type; WINNETTORGANICS C	ATTLE Honomble U.S. Manistrate Judge Deborah			
COMPANY, INC., a Colorado corporatio WINNETT CATTLE COMPANY, INC. : Colorado corporation; DOES 1 through 10	a Barnes			
Defendants.				
17 Detendants.	N. Elling American Street, and J. P.			
18	l Brillia (BCCPE) denni birner medden d pj r grei (BCC) (Brigs dendigri (Brest isk bro delig			
19	BRANCON STREET WAS A SERVICE COMPANY			
20	age Committee of the Co			
21 Please take notice that on Septemb	ber 24, 2021 at 10:00 a.m., or as soon thereafter as this matte			
22 may be heard, Plaintiff DEAN T. SMITH	may be heard, Plaintiff DEAN T. SMITH will, and hereby does, apply to this Court, at the United States			
23 Courthouse located at 501 I Street, Sacr	ramento, CA 95814, Courtroom 27, for a default judgmen			
24 pursuant to Rule 55(b)(2) of the Feder	al Rules of Civil Procedure, against Defendants DENNE			
Lhandon 18 14 14 14 14 14 15 15 15 15 15 15 15 15 15 15 15 15 15	CATTLE COMPANY, INC., WINNETT PERICO, INC.			
26 WINNETTORGANICS, and WINNET	TORGANICS CATTLE COMPANY, INC.			
	Defendants WINNETT CATTLE COMPANY, INC., WINNETT PERICO, INC.,			
	WINNETTORGANICS, and WINNETTORGANICS CATTLE COMPANY, INC. are not currently			

Interline Exhibit 12: Lead Plaintiff Starts New Enterprise In 2020- Sheldon Beef



478. Since early 2020, when Lead Plaintiff incorporated Sheldon Beef in New Jersey, this sequence of rights violations, human trafficking, and other racketeering acts, likely led by defendant FBI, has incorporated bad faith acts by, among others, WALMART (Interline Exhibits 9-10), WALMART (China) (Interline Exhibit 10), KROGER (Interline Exhibit 8), COSTCO, including its China and Korea subsidiaries, CIA, FBI, USMS, NYPD, Dewey TURNER, ROSSI, MAGGARD, SOLE SOURCE, CFO SEARCH, then by PATEL, ASTUDILLO,

ABDELSAYED (an Egyptian national posing as a CFO candidate), a Halal beef company seeking certified products, Raymond POON (paragraph 678 RICO-40, 680 RICO-42), Phil DALEUSKI (paragraph 678, RICO-40), John VANGCHHIA (paragraph 678, RICO-40), Todd CRAFT (Boston) (paragraph 678, RICO-40), and related undercover entities and individuals.

479. The true identities of these individual officers and agents acting in bad faith and against rights are not known to Lead Plaintiff, but their direct involvement is not in doubt and their pattern of acts is completely consistent with prior patterns of direct interactions with individuals now known to be or have been defendant FBI, USMS, CIA, ARMY, and other police powers and intelligence personnel including, without limitation, defendants NYPD, NJSP, BERGEN SHERIFF, PAPD, NJTPD, and other as yet unidentified police powers departments and agencies. This associated-in-fact enterprise pattern of racketeering acts affecting interstate commerce includes their use of commercial facilities, offices, and email addresses willingly furnished for their use by known private entity defendants including, without limitation, WALMART (Interline Exhibits 9-10), KROGER, COSTCO, and various other commercial and corporate defendants whether or not currently named herein including, without limitation, other named defendants at paragraph 149 and LPEE page 934-1075. Defendant UNITED STATES and other police powers departments and operations have and do use a wide variety of cover entities including, without limitation, entities and individuals operating undercover among those named at paragraphs 105, 120-224, 541, 651-672 RICO-13-34, LPEE pages 934-1075, LPEEV65-8, to conduct perpetual interferences affecting interstate and international commerce of Lead Plaintiff, and have doubtless conducted similar operations against other members of this class of plaintiffs, which illegal color of law abuses of rights and associated-in-fact enterprise patterns of racketeering acts have and do destroy commercial enterprises and deprive US persons of their constitutional rights for the purposes of perpetuating, without limitation, involuntary servitude, forced labor, and human trafficking of plaintiffs of this class. (Appendix 2 paragraphs 1-033 through 1-038).

480. Throughout this period, and since 1979, commercial business connections have been repeatedly established and sustained by Lead Plaintiff with people and entities thought to be other commercial ventures in finance, international business, domestic grocery retailers, and domestic suppliers. These were most often actually cover companies operated by defendants FBI, CIA, USMS, DOJ, and other police powers and intelligence departments and agencies, all affecting interstate commerce, and cooperating private entities which allowed their premises to be used in these illegal interferences affecting interstate commerce and/or created and employed their own fraudulent cover companies without actual intent to permit the Lead Plaintiff to engage in commerce, while these police powers departments and agencies played out various undercover roles to perpetuate pretexting, national security entanglements, and entrapment operations, Section 702 violations of a US person through deliberate entanglements into current and prior international espionage and surveillance operations, and other acts, violations, and injuries to (i) sustain illegal BRMT bioweapon and bioweapon delivery system development and deployment, (ii) sustain lethality operations against Lead Plaintiff, (iii) continue racketeering acts and patterns, and (iv) perpetuate the on-going cover-up of this associated-in-fact enterprise.

481. In another in the series of bald-faced attempt by defendant FBI to cover its tracks in 2023, a British Columbia condo release of interest (which had previously been released in a 2005 divorce from fraudulent second wife Jeanette) for just over \$6,000 suddenly appeared with no apparent reason eighteen years later in 2023. This \$6,000 release of interest generated an imagined tax loss, but was actually simply an entrapment scheme which was contrived by

defendant FBI's Manhattan (likely TURNER, ROSSI) and Amarillo (MAGGARD) field offices (paragraphs 300-302, 563-569, 624 RGTS-4, 670, 672, 682, 689 RICO-32, 34, 44, 51), in their attempt to cause and create (1) an imaginary \$6,000 tax loss to be claimed on a release of interest which had previously been released or (2) create an offset in the hope of causing a default on a defendant FBI funded fraudulent \$6,000 personal loan from MAGGARD. This \$6,000 personal loan used agency funds supposedly loaned personally by MAGGARD to Lead Plaintiff in yet another of FBI and other police powers' long series of associated-in-fact racketeering schemes. The intent of this entrapment sequence was to interfere with interstate commerce and attempt to create the circumstances for both a tax charge (offset a \$6,000 loan default against FBI funds with an \$6,000 imaginary tax loss for an interest previously released) and loss of federal benefits (Section 8 housing voucher which Lead Plaintiff is forced to rely on to pay having been impoverished repeatedly). These racketeering acts furthered the associated-in-fact enterprise pattern of entrapments and conspiracies against the interests of Lead Plaintiff in his repeated attempts and FBI wreckings of his organic protein startups, generally known as Winnett (dba WinnettOrganics), Winnett Cattle Company, then Sheldon Beef, and then Gannett Peak Ranch. These racketeering acts and the associated-in-fact enterprise which has and does perpetuate these defendants' pattern of racketeering acts became clear to Lead Plaintiff in September 2023, as the Menendez indictment in Edgewater, Nj was disclosed to the public and certain key identifications of individual defendants and their known institutional defendant associations became clear and obvious through various public disclosures at LPEE pages 12251-12261, effectively ending decades of successful federal police powers fraudulent concealment.

- 482. As shown in Interline Exhibits 4-19, despite their sworn Constitutional and legal obligations, defendants have for decades engaged, without limitation, in an associated-in-fact enterprise pattern of:
 - (i) deprivation of rights and conspiracy against rights,
 - (ii) racketeering acts, violations, frauds, and other injuries to the Lead Plaintiff and others of this class,
 - (iii) directly interfered in interstate commerce, including while these plaintiffs have engaged in good faith to:
 - a. produce and sell corporate agricultural production to large international retail companies,
 - b. attempt to supply foreign entities with agricultural products,
 - c. seek farmland and make asset and business enterprise purchases across state lines,
 - d. attempt to raise financing in-state, across state lines, and in other countries,
 - e. make business and personal use of out of state websites to purchase commercial and personal goods and supplies and commercial and personal services.

See 55 examples directly related to interstate commerce at subcounts RICO-1 through RICO-55 paragraphs 638-693. See also LPEE pages 140 et al, 380-386, 616-765, 1076-6094, 8233-10613, for thousands of further examples. Electronic records from this period through part of 2006 were stored on a laptop which was destroyed in about 2006 while homeless in Boston, but the hard disc drive was recovered in September 2007 and sent to a lab (likely an undercover FBI or USMS lab address), with a complete copy of contents handed to ROSENBERG at ESTABLISH in about October 2007. Production of these records by defendants FBI, ESTABLISH, ROSENBERG or the cover company lab itself will yield substantial additional evidentiary matter

and support further claims against these defendants. Additional examples and certain electronic records from 2018 through 2020 are blocked from Lead Plaintiff's access at this time, and tampering and field destruction of evidence in email accounts and other electronic records are documented herein.

483. Paragraphs 483 through 489 are reserved.

Illegal Human Trafficking In Involuntary Servitude: Lead Plaintiff's Personal Life—Continuous Manipulations, Episodic Destruction, Fraudulent Relationships, Sex Sting Entrapment Attempts

490. Lead Plaintiff's personal life has also been dominated by the illegal BRMT bioweapon and bioweapon delivery system program and associated-in-fact enterprise racketeering since at least elementary school in 1967, when Martha (Janet RENO, undercover later Attorney General) was present in his sixth grade class at Lakeland Elementary School (defendant FWSD). This illegal BRMT program dominance then extends through his high school years beginning in Fall 1970 at Decatur High School, a specialized high school in the Federal Way School District, Federal Way, WA which was spun out of another high school in the district three years before the Decatur High School building was even completed and graduated only 83 students (including fraudulent military academy aspirant fellow students Thomas Grady (ARMY) and Shawn Morrissey (KATYAL, probably DOJ, while claiming an interest in NAVY) in its first graduating class in 1973. GARLAND was plausibly present as Stuart Bettesworth. Around 350-400 students were in each graduating class of the other two high schools in the Federal Way WA school district at that time.

491. From that time period through today, Lead Plaintiff has been and is still an involuntary servant of defendant UNITED STATES, its illegal BRMT bioweapon and bioweapon delivery system program, its constitutional rights abuses, and racketeering acts,

violations, and injuries have been and are ever present, as have defendants USMS, USSS, FBI, ARMY, CIA and other minders assigned by defendant UNITED STATES and co-conspirator domestic and, at times, international police powers and intelligence operations. These officers, agents, informants, and others have and do pose as roommates, friends, fellow employees, romantic interests, spouses, realtors, bankers, and in other roles intended to provide defendant UNITED STATES' illegal BRMT program management with continuous awareness and extremely powerful adverse influence over nearly all life choices. College years at defendant WSU, Washington State University, Pullman, WA, included numerous contacts with defendant USMS handlers including, without limitation, PAGE and WILLIAM SACKVILLE-WEST while an undergraduate, first in chemical engineering, and later in business administration. GARLAND was present as student Robert Mandich on the same residence hall floor in Perham Hall and then at Nez Perce Village student apartments between 1974-1976.

492. While a Washington State University, Pullman, Washington (defendant WSU) undergraduate, Lead Plaintiff had a nearly two year relationship with Susan Irish, which included an overnight canoe trip to Dworshak Reservoir east of Lewiston, Idaho accompanied by a WSU Recreation Department group which had two males camping in an adjacent tent. This event sequence bore a strong resemblance to the camping trip he had taken at the age of 12 with Gary Jack where he was oxytocin (love hormone) hijacked in a California State Park for illegal biomedical experiment without consent with no direct sexual abuse by the use of a local BRMT hormone manipulation device triggered by two males in an adjacent tent camping spot. Lead Plaintiff also noted, during forensic review in 2021, the likelihood of certain oxytocin enhancements of Katherine "Kit" Andrews and the simultaneous flattening of Lead Plaintiff oxytocin levels while an undergraduate, while both were likely being BRMT biochemically

hijacked, particularly as the potential for such a relationship was specifically verbally minimized by a then close friend and co-resident of Perham Hall, William SACKVILLE-WEST, the ostensible son of Jack Sackville-West (BREYER). Lead Plaintiff was called out during a Cougars basketball game by Katherine's roommate, a WSU cheerleader, to join the skylined Katherine in the vacant school band section diagonally across the Performing Arts Coliseum from Section 51 where Lead Plaintiff was sitting with Bill SACKVILLE-WEST and Craig PAGE.

493. Lead Plaintiff graduated defendant WSU in June 1977 with a BA degree in Business Administration, worked in Coeur d'Alene, ID briefly, then Kent, WA before returning to WSU MBA graduate school in February 1978. Defendant FBI and CIA agents also attended WSU MBA graduate school, including EPSKAMP, WORTHY, ZOULAS, and THORPE. Senior CIA/ARMY illegal BRMT bioweapon and bioweapon delivery system program management personnel including, without limitation, BREYER in Spokane, WA 80 miles north of the WSU Pullman, WA campus, and Assistant Professor SHAFFER (defendant CIA embed at WSU during graduate school), to whom Lead Plaintiff acted as a Teaching Assistant were frequently present in his daily life. Early national security deliberate entanglements also began in this time period, including, without limitation, being assigned to co-office with Hamid Bahari-Kashani, an Iranian national economics PhD candidate and supporter of the Shah of Iran, whose family doubtless had CIA connections. The Shah abdicated and left Iran in January 1979 as described at paragraphs 421-424 above. Lead Plaintiff was then reassigned away from his shared office with Bahari-Kashani to a shared office with CIA and FBI personnel then attending the WSU MBA program.

494. After leaving graduate school, Lead Plaintiff joined the Seattle, WA financial audit staff at Deloitte (Deloitte Seattle), an international public accounting firm with offices worldwide, in August 1979, on a referral by SHAFFER through Deloitte Denver to Deloitte Seattle. Lead Plaintiff and his first wife, Lynne, were placed on a financial audit of Safeco in Seattle, Washington for about four months in early 1980, spent every day in the same room with about eight other audit team members, and developed their relationship in this relatively isolated environment, while spending every working day together with this group. The audit manager, Margaret Dufresne, already had a strong relationship with and, at some point in their friendship, was married to FBI agent Bruce Ciosacchi. Lead Plaintiff and his later wife Lynne were friends with the couple for a number of years thereafter. Lynne was the ex-wife of Gregory R. Boyle, a close subordinate of defendant REICHERT at defendant KCSD for many years as defendant KCSD conspired, supported, and sustained the illegal BRMT bioweapon and bioweapon delivery system, constitutional rights violations, and associated-in-fact enterprise pattern of racketeering acts in King County, WA until defendant REICHERT was elected to the U.S. House of Representatives in 2004, whereupon Lead Plaintiff was financially wrecked, fraudulent marriage destroyed, private enterprise destroyed and human trafficked by defendants FBI, ROSENBERG, and unknown others to Boston, MA in December 2005.

495. Around 1985, Lead Plaintiff and his wife Lynne survived a BRMT program double murder attempt by defendant CIA and/or ARMY near the Porteau Cove Overlook, south of Squamish, British Columbia, which had a narrow shoulder, a 70 to 100 foot cliff drop the right, no guardrail, about a 50 mph speed limit. As the road ascends from near sea level onto a cliff face while traveling south from the Porteau Cove Provincial Park entrance to a roadside overlook above Howe Sound, Lead Plaintiff was suddenly and massively dosed with melatonin (the sleep

hormone), using a remotely triggered BRMT device hidden in the cell phone equipment box in the trunk of Lead Plaintiff's car.

496. This cell phone equipment unit was installed by Robert SWAIN's cellular phone installation shop, which was later purchased by spouse Lynne's employer, US West New Vector Group. This was an illegal BRMT bioweapon and bioweapon delivery system field test using a cellular phone network trigger rather than a manually operated trigger or a radio frequency trigger, so it represented a step in the technological progression of the illegal BRMT bioweapon and bioweapon delivery system. Within about two years of that attempt, Robert SWAIN, a serial adulterer as described by Lynne, had divorced his own fourth or fifth wife to marry Lynne, the Lead Plaintiff's oxytocin overdosed former wife (and his co-victim in the attempted Porteau Cove murder) about 90 days after the Lead Plaintiff's divorce from Lynne was finalized in 1988.

497. Sometime during this same period, but prior to the Porteau Cove double murder attempt, defendant UNITED STATES, most likely defendant CIA, had previously run a murder entrapment attempt at the Stevens Pass Ski Resort described at RGTS-1, likely with coconspirator defendant KCSD in attendance. During this period, Deloitte Seattle's HOPPER or BURNS was directing the illegal BRMT bioweapon and bioweapon program for defendant CIA. Defendants WEISSMAN and ROSENBERG were among the most senior FBI undercover personnel co-opting private enterprises PCC and NutraSource for spying and wrecking operations during this period.

498. Soon after defendants CIA and ARMY had used the illegal BRMT biopweaon and bioweapon delivery system to destroy Lead Plaintiff's first marriage to Lynne in 1987 and early 1988, as Lead Plaintiff was being divorced by Lynne, and was relatively emotionally vulnerable, defendant UNITED STATES (CIA, BURNS) used WATERS to orchestrate the introduction of

and entanglement with his second spouse, Jeanette (paragraphs 440, 610 HEXP-7). Throughout this period defendants BURNS, WEISSMAN, and ROSENBERG personally directed malign operations targeting Lead Plaintiff. Defendant BURNS ostensible residence, as an OB/GYN practicing at Evergreen Hospital, Kirkland, Washington was about two miles from that hospital, and directly across NE 149th Street from Jeanette's residence which she shared with her son Bryce. Defendant BURNS allegedly resided there until around 1992-93 after Jeanette and Lead Plaintiff were married in 1990 and Alliance, his defendant cover operation was wrecked on him by defendant FBI. Defendant BURNS then allegedly sold that 149th Street residence to a "family relative," Kelly last name not recollected, had three daughters and a younger son, and ostensibly owned a Vibra-Clean franchise, which was also used in both federal security operations and in illegal residential and commercial spying, and almost certainly the next co-conspirator in the long series of defendant UNITED STATES minders. Kelly was later succeeded by the Phillips family, with a supposed realtor breadwinner, also likely a defendant USMS minder supporting the illegal BRMT bioweapon and bioweapon delivery system program.

499. Lead Plaintiff's second wife, Jeanette, was introduced by WATERS, a LazerSoft software engineering contractor originally hired by defendant STONE at LazerSoft. Defendant BURNS was the primary LazerSoft funder (using CIA science and technology directorate funds funneled through real and imagined bankers and medical doctors' investment accounts) as described at paragraph 437-442. With benefit of (i) a better understanding of marital behaviors which came with the unmasking of the illegal BRMT bioweapon and bioweapon delivery system program, (ii) the identifications of defendant BURNS, who was the cross street neighbor to Jeanette at 149th Street, Kirkland, WA before Lead Plaintiff ever met her, and (iii) forensic analysis of comments about sexual orientation of a couple by HADJINIAN, it is considered

highly probable that Jeanette was actually likely an active enlisted military service lesbian or bisexual deliberately inculpated in some national security matter, then threatened with prosecution during a time when such service by service members with these sexual orientations was considered a national security risk, and was then coerced into meeting the Lead Plaintiff under a civilian cover for an orchestrated fraudulent romantic interest in1988, which was followed by a deeply troubled 15 year marriage beginning in 1990.

500. Lead Plaintiff was introduced to supposed Jeanette's family of origin, the Yarbrough family, beginning sometime in 1988 or 1989. Defendants Lisa RUBIN (FBI. as Michelle Yarbrough by alleged marriage to Jess), Alexander VINDMAN (ARMY, as Paul Yarbrough as stepbrother), and later his twin brother Yvgeney "Eugene" (ARMY, as Greg Yarbrough), and still later Ari MELBER (FBI, as Wes Lewis, romantic interest likely as a result of multiple sequential illegal BRMT oxytocin biochemical hijackings of Theresa, Jeanette's half-sister) posed as Yarbrough extended family members. Alexander's twin brother Yvgeney "Eugene" (ARMY) appeared periodically as Greg, Paul's Grateful Dead band loving brother, who ostensibly worked at CSC in Birmingham, Alabama. Lead Plaintiff was an uncle to Shanice, Jack, and nearly a dozen other children of several of these individual defendants from 1990 until his divorce from his fraudulent second wife Jeanette in 2005.

501. Notably, defendants MELBER (FBI, Wes Lewis, who became the husband of Theresa Yarbrough), VINDMAN (ARMY, Paul Yarbrough), and RUBIN (FBI, Michelle Yarbrough) are among the now identified defendant FBI, DOJ, and military services government officials who disappeared from view after the 2005 divorce from Jeanette. Their current listed official biographical ages do not tie out to the ages they would have been in the 1990s. This is a result of biographical and, at times, medical plastic surgery modifications during their

"resurrections" from deep cover assignments. This same tradecraft has been and is used by various federal police powers and intelligence agencies to exit personnel from deep cover assignments to "normal" life including, without limitation, defendant BREYER (SCOTUS, after Jack Sackville-West, Spokane "died") and Lloyd AUSTIN (rotations through Boeing defense operations, temporary duty assignment to CNA, others, actually defendant ARMY throughout, now Secretary of Defense). These birthdate changes are tradecraft elements of background legends which have subsequently been built to minimize the possibility of an identity match, by for example, being too young based upon the "resurrected" birthdate to be an adult while you were an adult figure in a prior undercover life. This reduces the odds that someone will make an identity match across these two "lives" at some future point, as in this complaint and several identifications herein. This is a common technique for manufacturing new identities for deep cover operatives - but these defendants' physical appearances are completely consistent with positive identifications and near normal aging, with the occasional bit of face tightening or other normal medical procedures used to modify appearance.

502. Lead Plaintiff's personal life has been dominated and subjugated by defendant UNITED STATES under its illegal BRMT bioweapon and bioweapon delivery system, civil rights, and racketeering conspiracy associated-in-fact enterprise pattern incorporating involuntary servitude since he was very young, probably about the time of that California State Park campground sequence at age 12, paragraph 417. Since 2004, when Lead Plaintiff began online searches of dating sites during the pendency of the 2005 divorce from Jeanette, dozens of fraudulent orchestrated police powers and media industry dates, and several bogus relationships intended to sensationalize Lead Plaintiff and to construct false narratives have been cycled through the Lead Plaintiff's life in 2005, 2008, and again in 2019-2021, paragraph 608 HEXP-5.

In late 2004 and 2005, Lead Plaintiff was subjected to a series of approximately 15 to 20 online dates in the Seattle and Portland areas with defendants' undercover police powers personnel.

503. This pattern of personal relationship interferences by defendant UNITED STATES, including online romance scams, hacking of online dating sites, and fraudulent matches with police powers personnel and police powers assignees has continued since late 2007 in the New Jersey/New York City region. A fraudulent female relationship (MODDERMAN, paragraph 611) was also terminated as Lead Plaintiff was terminated from ESTABLISH in 2007 to maximize personal stress on the Lead Plaintiff, a practice he now recognizes as customary tradecraft.

504. These co-conspirator defendants, including regional and local police powers (including, without limitation, NJTPD, PAPD, NYPD, BERGEN SHERIFF, NJSP), were also running local sex entrapment attempts online in 2011-2014. Then defendant CIA stole about \$14,000 of cash welfare grant funds and Social Security retirement funds from the Lead Plaintiff using illegal BRMT bioweapon and bioweapon delivery system hijacked oxytocin to fraudulently extract funds using a lesbian online porn queen as the wholesome bait in an online dating scheme between 2014 and 2018 (paragraph 612 HEXP-9).

505. During 2019, these sex traps again returned to real life (just as they had been run in 2004-2005 at paragraphs 608, 614 HEXP-5, 11, but with the obvious tinge of overt racism in the dating prospects who were allowed through as the screened-in dates) in a series of about 15 fraudulent dates which expenses were paid for by Lead Plaintiff (paragraphs 608, 614 HEXP-5, 11). A follow-on fraudulent romance which was orchestrated in 2020 began with defendant GIA during the Covid-19 outbreak and ran into 2021 (paragraph 613 HEXP-10). While the overall New Jersey/New York City area population is about 15% Black, all of Lead Plaintiff's dates

except the first 2019-2020 series were Black females, a sure sign of police powers screening and gated access to women who were permitted this special access to respond to online matching invitations from the Lead Plaintiff, a White male. Except for MODDERMAN and GIA, these outings were very short-lived, lasting no more than one or two dates. Color of law honey trap sting operations have also been run against the Lead Plaintiff on city streets, shops, parks, performance venues, subways, buses, and all other types of public places in New York City for approximately seventeen years, with accelerated intensity from November 2018 to around late 2021 in New York City on virtually every visit there.

506. From that point forward, all online contacts with dating prospects have ended in failure and no in-personal contact through any online source has ever resulted in any face-to-face meeting. Lead Plaintiff's online attempts have otherwise been completely obstructed by defendant UNITED STATES by technology hacking documented in the RICO section of this complaint, paragraphs 639-693.

507. These civil rights violations and racketeering acts inculpate defendant UNITED STATES, all other police powers defendants, and their related individual defendants, in these bad faith acts, excluding MARICOPA SHERRIFF and defendant ARPAIO which did not participate in this type of entrapment operation.

508. Paragraphs 508 thorough 509 are reserved.

Lead Plaintiff's Personal Finances and Assets Repeatedly Subjected to Forced Liquidation By UNITED STATES, Using Relationship, Employment, And Private Enterprises Sabotage

510. Lead Plaintiff substantially improved five residences over the past 40 years, ranging from modest remodels and interior renovations to extensive landscaping to complete rebuilds and 60% square footage additions. Upon completion of each of these improvements, defendant

UNITED STATES contrived a life event which forced the liquidation of these assets to a third party. Both divorces and indirectly forced removal due to financial or other circumstances "occurred" soon after those renovations and rebuilds were fully completed. The properties sold or were re-rented very quickly, indicative of defendants' insider knowledge and advantage. Violations of Lead Plaintiff by defendants have over time resulted in forced liquidation of all assets on multiple occasions, including the first family home he and his wife purchased for \$189,340 at age 29, as shown in Interline Exhibit 13 below.

Interline Exhibit 13: Redmond Residence – Added Rear Landscaping 14,000 Square Feet, Added In-ground Sprinklers Front and Rear Covering 28,000 Square Feet, Renovated Front Planting Beds



• LAST SOLD ON AUG 16, 2012 FOR \$675,000

17026 NE 133rd St, Redmond, WA 98052

\$1,688,289Redfin Estimate

4 Beds 2.5 Baths **2,800** Sq. Et

Wood nville

Cottage Lake

Cottage Lake

Thinking of selling?

Estimated sale price

\$1.60M - \$1.91M

Source: Redfin.com photo, January 2024

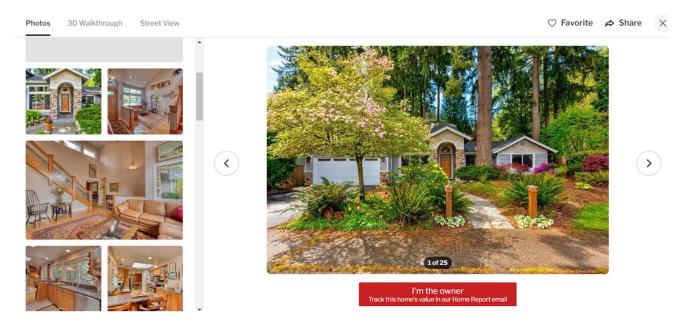
511. Lead Plaintiff's second family home (Interline Exhibit 14 below) was sold quickly in May 2005 while in financial distress created by another in the sequence of racketeering acts incorporated in this overall sequence of programmed personal (paragraphs 498-502, 610 HEXP-7) and financial wreckings (paragraphs 457-463; 639, 640, 641, 673, 683 RICO-1-3, 35, 45), after about ten years of labor and investments to rebuild the residence from the back fence line to

the front sidewalk. This second family home started as the reverse floor plan of the house in the first photograph below. This house is on a lot which shares the southeast lot corner of Lead Plaintiff's second home and fronts on a neighboring street. Lead Plaintiff rebuilt the reverse floor plan twin of the top photo into the home seen in the other photos below (Redfin.com photos from 2022 and 2024.

Interline Exhibit 14: Kirkland Residence -Rebuilt and Added 60% Square Footage Enlargement



Reverse floor plan of residence shown above was transformed by Lead Plaintiff as shown below:



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Listed by Rick Juma . Aqua. Bought with Windermere Real Estate Co.

LAST SOLD ON JUN 23, 2020 FOR \$785,000

11729 NE 149th St, Kirkland, WA 98034

\$1,091,991 3 2 1,990 Redfin Estimate Beds Baths Sq Ft

512. All of Lead Plaintiff's material possessions except for one rolling suitcase, and boxes left at his sister's house (nearly all of which were subsequently donated and likely collected by defendant police powers personnel posing as charity workers for yet another illegally pretexted search and subsequent distribution to favored persons) were forfeited when Lead Plaintiff left Seattle for Boston on December 24, 2005. This recurrent cycle of physical possession accumulation and residential improvements completed, then followed soon after by some form of forced forfeiture was repeated yet again when Lead Plaintiff was removed from the apartment he furnished and improved in Cliffside Park, NJ on October 1, 2010, after a one m)onth overstay, and about 110 days after filing litigation in Newark federal court (NJ 2:10-cv-

3204) and was then kidnapped with no commitment hearing as required by NJ state law (paragraph 808) through an unknown police powers action after being transported by South Hackensack, NJ Police and an ambulance corps ambulance into a psychiatric hospital for six months of confinement (paragraphs 512-522, 606 HEXP-3g). Once the federal civil rights case was indirectly coerced into "voluntarily" dismissal while confined, he left the hospital in March 2011 (less than 100 days after "voluntary" dismissal) to live in shared housing in Ramsey, NJ (paragraph 523) which had been continuously available from before the date of his confinement.

513. Lead Plaintiff resided in Ramsey, NJ from March 31, 2011. Once he began receiving Social Security retirement at age 62 in late 2017, he spent about \$5,000 of Social Security retirement funds in early 2018 to improve the Ramsey residence including appliances and furnishings, presuming he would continue living there for some time to come.

514. Soon after these upgrades were complete, he abruptly received a Section 8 voucher in Summer 2018. As a result, he contacted United Way to secure bridge loan funds for the last month's rent and security deposit on the new apartment. This was intercepted and denied, most probably by defendant FBI or USMS. Defendant FBI and/or USMS used this Section 8 voucher to support Lead Plaintiff's human trafficking to a defendant USMS undercover entity owned apartment available at a favorable lease rate at City Place in Edgewater, NJ in November 2018, for continuing entanglements, this time into national security public corruption, soon after the 2018 opening of the Menendez corruption investigation. Edgewater, NJ is the same borough where two of Senator Menendez's co-defendants, Daibes and Hana, have and do operate businesses about 550 feet from the Lead Plaintiff's residence.

515. Around 2019, defendant USMS then bankrupted the entity which owned the apartment, later placed the City Place, Edgewater apartment in a new entity, and arranged a 12

month lease which is now mis-timed with the renewal of the Section 8 voucher. This allows defendant USMS to orchestrate termination of the lease (or raise the rent exorbitantly if desired) while the lease renewal cycle is out of synch with the voucher renewal cycle, so their human trafficking pattern can be more easily repeated. When the lease terminates and no other apartment is available in the general area, the voucher recipient can be forced from the area AND lose their voucher as this Section 8 program does not easily accommodate voucher transfers. When used with defendant UNITED STATES technical computer hacking to constrain searches for alternative residences, this pattern of illegal acts can be used to force relocation (and further human trafficking) on the voucher recipient (Lead Plaintiff in this case), or the total loss of the Section 8 voucher, completely at the illegal and discriminatory discretion of defendant USMS. While this practice is illegal, a prior attempt by Lead Plaintiff to relocate to White Plains, NY, has already shown this to be the practical impact of this particular approach used by defendant USMS in this form of the Section 8 program. The email evidence supporting this allegation, and of Lead Plaintiff's human trafficking from Ramsey to Edgewater in 2018, is among the evidence of acts, violations, and injuries between 2018 and 2020 which is currently blocked, or has been deleted while he lacks access, in Lead Plaintiff's email account from Lead Plaintiff by defendant UNITED STATES.

"National Security" Pretexting of Lead Plaintiff by Defendant UNITED STATES Accelerated After 9/11 Attack

516. After the terrorist attacks of 9/11/2001, Lead Plaintiff's life become markedly worse (as summarized at paragraph 604 HEXP-1) as defendants CIA, FBI and other federal agencies were rewarded with greater powers for defendant FBI's notable pre-attack interdiction failures in the months preceding the attack, as documented by the 9/11 Commission Report. In August 2002, Lead Plaintiff left CNA Industrial Engineering, formed a new enterprise Allegent,

LLC dba Performa, which then failed in 2005 after defendants actions under color of law involving, as in times past, (i) defendant FBI check fraud (ShipNow paragraphs 275(i), 471(ii), 650 RICO-12), (ii) defendant USMS cover company CNA compensation fraud (CNA, paragraphs 471(i), 644 RICO-6), and (iii) litigation expenses (ShipNow and CNA, paragraphs 471(ii), 644(v) RICO-6, CALDWELL, paragraphs 99c, 275(i), 320(f)(vi)), 683 RICO-45) combined with other fraudulent police powers color of law actions including, without limitation, (iv) defendants FBI and TSL commercial sales frauds (Technology Sales Leads (TSL), paragraph 673 RICO-35) which were used to destroy this consulting LLC. The undercover nature of the Allegent, LLC co-ownership by (v) PRAY, likely FBI, was then unknown to the unwitting Lead Plaintiff (paragraphs 461-462, table at 541, 683 RICO-45). PRAY was previously a known associate of ROSENBERG at NutraSource while serving as its IT Director, reporting to CHRISTENSEN (CFO, who later joined PACIFIC PIPELINE).

Defendants Malicious Acts Against Lead Plaintiff Extend to Torturous Acts

517. During 2004-2005, Lead Plaintiff was also systematically abused by defendant UNITED STATES' torturous use of BRMT brain hijacking and psychological operations by FAUCI (NIAID Director) to force him to the point of suicide ideation (paragraph 604 HEXP-1), after which he was forced to quickly sell the 149th Street, Kirkland, WA home he had rebuilt over about ten years, in order to avoid foreclosure (Interline Exhibit 14). More details of this comprehensive ruinous and torturous sequence are included in LPEE Table 2 paragraphs 2-0024, 0060, 0077, 0084, 0088-0097. Through this process, defendants again stripped Lead Plaintiff's financial assets, real property, and personal property, and tortured his brain chemistry to the point of suicide ideation, which medical records were never transferred in a pattern of obstruction by defendant UNITED STATES (DOJ, USMS, FBI, CIA).

518. Lead Plaintiff fled the Seattle area by defendants' design, as detailed at LPEE Table 2 paragraphs 2-0105 to 2-0115, to the next pretexted destination in the defendant FBI human trafficking sequence orchestrated by ROSENBERG, Boston, on December 24, 2005. His rationale was to avoid the possibility of adverse acts being directed at other family members in order to pressure and entrap him. When his remaining funds were exhausted in early Spring 2006, homelessness ensued at Pine Street Inn, a Boston area homeless shelter. After seventeen months of homelessness in Boston, he was next human trafficked in August 2007, to 10 months of further involuntary servitude and forced labor in fraudulent employment at ESTABLISH, Fort Lee, NJ, where he worked on two interstate consulting projects. Defendant ROSENBERG (FBI), then known as William Drumm, and working without his Seattle area worn hairpiece to avoid recognition, was the General Manager of defendant ESTABLISH. Lead Plaintiff performed a fraudulent Sales and Operations Planning software selection project, ostensibly for PPG's Paint and Coatings Division at PPG headquarters in Pittsburgh, PA. He then "developed" and performed a fraudulent project for Clipper Windpower in Carpinteria, CA and Cedar Rapids, IA. See LPEE pages 8351-8352, 10305-10310, 10311-10364. The PPG project sequence included a tangential Pittsburgh hotel evening cameo with the Pitt Football team at one of their public fundraising events (KOVONUK, FBI), which coincided with defendant FBI's investigation of the Pitt football assistant coach child sex scandal in late 2007-2008, and with a likely Mueller (former FBI Director) cameo with ROSENBERG in an upper floor office area of PPG headquarters (paragraphs 219, 411, 467-470, 536 HEXP-8).

519. During this period, he was also placed under a carefully pretexted national security color of law investigation for terrorism which ROSENBERG (FBI) pretexted to engage the Joint Terrorism Task Forces in the New York City/New Jersey area and into defendant UNITED

STATES' own much greater intelligence and police powers operations in the greater NYC region (paragraphs 603, 604 NSEC-3, 4, Interline Exhibit 17). Defendant UNITED STATES has a much greater concentration of intelligence and police powers personnel and other assets, and a closely collaborating set of police powers agencies including, without limitation, defendants BERGEN SHERIFF, Port Authority of New York and New Jersey Police PAPD, New Jersey Transit Police Department NJTPD, New Jersey State Police NJSP, and City of New York Police Department NYPD (paragraphs 611, 613 HEXP-8, 10; 630, 632, 634 RGTS-10, 12, 14, and Interline Exhibit 17), some of whom have long histories of constitutional and civil rights violations and extensive records of use of excessive deadly force. A defendant ESTABLISH "annual business meeting" trip to London was also used to drag UK's MI-6 (CIA equivalent) into the mix again in September 2007 (paragraph 11, 465, 599 d(i)(e), 603 NSEC-4), which defendants FBI and CIA had done in London in 1993-1994 on a series of bogus PAN financing trips with CORNWELL (ex-CIA, to meet with Kurtanjek (MI-6), while Lead Plaintiff had worked on another bogus cover company, PAN in Seattle, WA (PAN, paragraph 450-451, 601F NSEC-2).

520. Defendant UNITED STATES was the initiator of this entire sequence from 1968, deliberately entangled Lead Plaintiff in national security events and projects to perpetuate involuntary servitude and forced labor, among other acts, violations, and injuries, and was fully aware at all times that there was no basis in law for this entire pattern of pretexted suspicion nor for the highly intrusive and perpetual "investigations" and did purposefully fail to act to quash and in fact fully participated in spreading disinformation to others and encouraged and invited other police powers agencies, media and the general public to participate in this pattern of abuse and discrimination in order tot sustain the illegal BRMT bioweapon and bioweapon delivery

system program, constitutional rights violations, and associated-in-fact enterprise pattern of racketeering acts.

Defendants Malicious Acts Against Lead Plaintiff AGAIN Extend to Torturous Acts

- 521. After Lead Plaintiff was terminated from unwitting fraudulent employment at ESTABLISH (paragraph 320c, 466, 503) in June 2008, and through the first months of 2010, Defendants again engaged in extreme and continuous BRMT biochemical abuse of Lead Plaintiff's brain chemistry while Lead Plaintiff continued to reside in a secretly concealed ownership defendant USMS controlled "safe house" apartment in Cliffside Park, NJ, ostensibly owned by defendant CHALOM. This abuse altered the Lead Plaintiff's brain biochemistry to the point of a second suicide ideation (paragraph 606 HEXP-3) and included extended periods of physically torturous actions, muscle spasms, sleep deprivation, and extreme daily headaches about the same time every day for over a year, by using the illegal BRMT bioweapon and bioweapon delivery system very aggressively (paragraph 606 HEXP-3, 810, 811); a defendant USSS drive-by of the "Beast" presidential limousine one afternoon on Palisade Avenue while he was called to a kitchen window he rarely visited; the removal of a supposed terrorist from his seven-unit apartment building by defendant FBI reported by CHALOM; and other efforts to induce psychological and physical stress and fear.
- 522. Upon completing his second attempted legal complaint, this time to the Federal District Court in Newark in June 2010 (NJDC case number 10-3204 (SDW)), his apartment was rented out from under him by late July to a third party, and he received a knock on the door on September 1, 2010 by defendant CHALOM, accompanied by a "new tenant," and he was forced back into a second episode of homelessness on October 1, 2010 after a one month overstay. He took a NJ Transit bus to the county shelter in Hackensack, NJ, was told there was no room and

was directed to another overnight shelter at a nearby address which address did not even exist, then was redirected by the Hackensack, NJ Police Department desk sergeant on duty that day to a local budget hotel, Airport Inn in South Hackensack, NJ, where his remaining funds were exhausted. The following day, October 2, 2010, the combination of sustained stresses and illegal BRMT bioweapon and bioweapon delivery system brain hijackings (forcible takeovers) landed the Lead Plaintiff in a locked mental hospital ward for six months (Bergen Regional Medical Center), even though the admitting process to that the facility mandated by state law was not followed, paragraph 808. He was deemed "schizophrenic," likely by an embedded defendant UNITED STATES medical doctor and, early in the initial two week period of the "involuntary" stay, placed in a padded cell where unexplained medications were administered by a needle to his buttocks while he was held without resisting by two orderlies on at least two occasions (paragraphs 606 I, 606 J, 611H(xv) HEXP-3, 8). NJ law does not allow a hospital patient to be released unless they have shelter. With no money, Lead Plaintiff attempted to be referred to a homeless shelter – he was repeatedly told there was no room, so he was stuck in the ward while he was coerced into dropping federal civil rights litigation which the federal district court had simply refused to order be served o the defendants as required under 28 U.S.C. § 1915. See paragraph 320e and LPEE pages 190-236 for an actual independent assessment of his high conscientiousness and very strong emotional stability.

523. About two months into the stay, an unknown undercover agent who rotated through the same ward indicated indirectly that he would not be leaving anytime soon. Then, within 2-3 weeks after he "voluntarily" dismissed the complaint, he was told that a rehousing process was beginning, and three months after Lead Plaintiff "voluntarily" dismissal NJ federal District Court case (NJ case number 10-3204 (SDW)) under this duress, he was rehoused in Ramsey, NJ by a

NJ social service agency Advance Housing on March 30, 2011, which by forensic reverse engineering has been determined to have hosted defendant USMS undercover officers and others with privileged access as his case managers. That pattern of minders continued through about \$5,000 of improvements to this Ramsey apartment's furnishings and fixtures in 2018 using Social Security retirement benefits until his next human trafficking in November 2018, this time using a Section 8 housing assistance voucher, to Edgewater, NJ. A favorable rent rate allowed him to live in City Place, a mixed retail and housing complex near the Hudson River, where he continues to live today......

524. In another tricked out defendant USMS controlled apartment. Five hundred and fifty feet from the offices of two indicted co-defendants (Daibes and Hana) in SDNY's Senator Menendez criminal corruption investigation, indictment, and trial. That investigation began in early 2018, perhaps three months before he received his notice of a federal Section 8 voucher being awarded through the NJ Department of Community Affairs. The offices of gastroenterologist SCIARRA were also in this same building, until SCIARRA abruptly left his decades old NJ medical practice and moved to Beaufort, SC, shortly after Lead Plaintiff was BRMT hijacked into a statue fall from a standing position to his right next to a wall, so he narrowly missed a potentially fatal penetration of his right temple while in a hospital recovery room after his second colonoscopy within six weeks, while under SCIARRA's care, as documented at paragraphs 524, 706 LETHL-13.

525. A more complete inventory of lethality attempts and methods, as directed at Lead Plaintiff, is at the LETHL series, paragraphs 694-710 LETHL-1-17. Decades of fraudulent concealment by police powers agencies and departments has equitably tolled this entire matter. Willful blindness by defendant DOJ to more than 40 complaint letters hand delivered to SDNY

in 2021 through early September 2023 demonstrate this willful blindness of DOJ in recent times. The Menendez indictment, made public September 22, 2023. explains the timing of the Lead Plaintiff's 2018 human trafficking by elements of defendant DOJ (FBI and USMS) – into the same geography as that investigation, to again sustain pretexting, entanglements, and entrapments in a manipulated environment controlled by defendants USMS and FBI, and to support the continued development, testing, and deployment of the illegal defendant CIA/ARMY BRMT bioweapon and bioweapon delivery system, this time under the eye of GARLAND, who has a direct personal conflict of interest as to Lead Plaintiff and this specific illegal program (paragraph 5). This specific pattern of racketeering, incorporating, without limitation, human trafficking, involuntary servitude, forced labor and unemployment, wrecking of private enterprises, and so forth, has and does recur from at least 1968 through today for Lead Plaintiff.

Lead Plaintiff's Personal Volunteer Work Sabotaged By UNITED STATES

526. Even Lead Plaintiff's volunteer efforts have been subverted in both Washington state and New York City. Lead Plaintiff was selected during the early 2000s as the volunteer regional Chair for the northwestern United States chapter of AeA, the technology trade association representing Microsoft, Intel, Hewlett Packard, and other multinational and smaller technology firms in Washington, DC, Washington state and many other state capitols with a significant technology industry presence. While volunteering at AeA, he worked directly with Washington Governor Locke's staff and was asked by the Governor's Chief of Staff Susan Crystal to accept a key appointed volunteer position as Chair of the state's Higher Education Coordinating Board. He also worked with key Democrat and Republican legislative leaders on higher education access and a variety of other state policy issues. See LPEE page 10780. This volunteer work through AeA and then Washington Business Alliance, ended badly in 2005 at the

hands of defendants FBI, USMS, CIA and ARMY, ROSENBERG, FAUCI, and unknown other defendants, as they conspired to accentuate hardships and divorce into the psychological shock of a programmed brain chemistry collapse (disguising the continued development and abuses of the BRMT bioweapon and bioweapon delivery system) into suicide ideation followed by homelessness as conducted by defendants (paragraph 461-463, 490-500, 511-512; 600-602 NSEC-1-3; 604, 610 HEXP-1, 7; 628-636 RGTS-8-16; 639, 641, 644-646, 673, 683, 695-697 RICO-1, 3, 6-8, 35, 45, LETHL-2-4).

- 527. Subsequent community activities have been systematically disrupted to suit defendant UNITED STATES' propagandistic narrative regarding Lead Plaintiff include, without limitation:
 - A. The September 11, 2005 Pentagon Memorial Service was moved to Arlington

 National Cemetery (Saturday, September 10) while Lead Plaintiff was misled with

 published information online about that event's location both before and as he visited

 Washington, DC to lodge a Federal Tort Claims Act complaint letter hand delivered

 to defendant UNITED STATES at DOJ, FBI, IRS, EOP, among others (never answered).
 - B. As a volunteer for New York Cares in 2008 after being terminated by ESTABLISH, Lead Plaintiff's projects were organized, hijacked, and perverted by defendant police powers, including folding clothes and processing hangars at a used clothing charity, a homeless children's field trip to Long Beach, a library outing, and finally a completely bogus address to discourage any further volunteering, as this contradicted the fraudulent narrative these defendants have and do try to portray regarding the Lead Plaintiff's character.

C. A liar letter was sent on National Park Service letterhead in September 2021 regarding the bogus location of the August 2021 MLK "I Have A Dream" speech anniversary voting rights rally being cancelled at the Lincoln Memorial and moved to a place near the National Archives (Interline Exhibit 16).

And so forth by defendant UNITED STATES' skilled propagandists working to construct and control the public narrative about the already highly visible Lead Plaintiff.

528. This associated-in-fact racketeering (RICO) conspiracy perpetrated primarily by defendant UNITED STATES, including, without limitation, CIA, ARMY, FBI and USMS illegal use of embedded managers who have and do use cover companies, abuse private enterprises, and use unappropriated private sector funds to benefit themselves personally, and to operate this conspiracy against rights, against private enterprises, is the **second** of defendants' five basic illegal patterns of practice.

529. Paragraphs 529 through 534 are reserved.

2. THIRD, Indirect Threats, Lethality Attempts, And Human Trafficking Are Used To Coerce And Indirectly Destroy Evidence Of Past Crimes

535. The first known attempt in a now long-running sequence of lethality attempts by defendant UNITED STATES against the Lead Plaintiff 's life was the extra-territorial act of attempted double murder of Lead Plaintiff and his first spouse, Lynne, in British Columbia in the early 1980s as described at paragraph 694 LETHL-1, Appendix 2 paragraph 1-001A, and LPEE page 181. The lethality series (LETHL subcounts herein at paragraphs 694-710 LETHL-1-17) documents this and subsequent attempts to severely injure or kill the Lead Plaintiff which have and do occur periodically from the 1980s and continued in into the current years.

536. Since the fraudulent ESTABLISH employment by ROSENBERG (FBI) in 2007-2008 and the probable MUELLER interactions with ROSENBERG conducted at PPG headquarters during the fraudulent PPG project in Pittsburgh while defendant FBI's Penn State sexual abuse investigations were underway there, (individual defendant KOVONUK FBI) arranged a sidebar with the Penn State football team at a downtown Pittsburgh hotel reception they held during the PPG project), defendant UNITED STATES and co-conspirator intensity and frequency of adverse acts, violations, and injuries against Lead Plaintiff have been far more frequent than in prior periods while he resided in Washington state, particularly more intense since 2021.

- 537. As during prior decades, these acts, violations, and injuries are consistently planned and produced at vast expense to appear as naturally occurring events, but defendant UNITED STATES employs the illegal BRMT bioweapon and bioweapon delivery system, and an array of its own and co-conspirator personnel, to orchestrate these events including, without limitation, to tamper, retaliate, and intimidate. Since 2021, examples (which are more fully described at LPEE pages 11645-11672, 12150-12261) of defendants' active threats, harms, injury, and lethality focused acts, include, without limitation:
 - (a) A colonoscopy related trapped fall toward the elevated leg of a roller stand which narrowly missed the Lead Plaintiff's right temple in April 2021 (Appendix 2 paragraph 1-039), producible medical records available from the hospital (paragraph 706 LETHL-13);
 - (b) This colonscopy event was conducted by gastroenterologist SCIARRA who then abandoned a decades-old northern New Jersey gastroenterologist medical practice and relocated to Beaufort, NC, abandoning his medical practice and office which was in the same building as two indicted Menendez co-defendants, (Daibes and Hana, paragraphs 514, 524), paragraph 706 LETHL-13;

- (c) An August 2021 mini-torture session of outer tendon of left knee tendon during a New York Mets baseball game, and an induced sleep period during two Mets base hits in the same inning with loud crowd noise which were neither heard nor seen by Lead Plaintiff (paragraph 607 HEXP-4);
- (d) Induced choking on beef steak by deliberately mistimed illegal BRMT bioweapon and bioweapon delivery system induced premature swallowing occurred in early 2022;
- (e) An indirect verbal threat was made on July 16, 2022 (Interline Exhibit 15A), the first ever verbal threat in a series, these threats have continued through April 14, 2024, see (j) below;
- (f) Sword slice style very precise pattern physical contraction of neck muscles across the back of the neck began, emulating the sensation of a guillotine slicing the neck in August 2022. Since this sensation is literally impossible for the brain to produce except by artificial stimulation, this nerve activation pattern was dropped by September, returning again to blunt force karate chop style sensations to the back of the neck. Shortly thereafter, defendant UNITED STATES added an involuntary rapid twist of the neck which simulates a lethal neck twist similar to that used in lethal martial arts silent killings;
- (g) An MTA express train derailment attempt (terrorism, paragraph 707 LETHL-14) was executed about one to two minutes after sunset on September 11, 2022 (Interline Exhibit 15B), followed by a full somersault fall on the fifth flight of deliberately darkened granite stairs soon after sunset caused by an illegal BRMT bioweapon and bioweapon delivery system brain hack on that flight of stairs in Morningside Park, New York City on September 17, 2022 about 7:30PM (paragraph 708 LETHL-15, Interline Exhibit 15C);

- (h) A speeding vehicle rundown threat sequence was run on November 18-19 after dark, first in New York City, then in Bergen County, NJ (paragraph 709 LETHL-16, Interline Exhibit 15D);
- (i) During 2023, the focus shifted toward more verbal threats (always delivered from behind) to accompany those previously consistently made visually (such as baseball bats carried out of season, and Abner Louima incident recalling broom handles, a well above average frequency of lights and sirens ambulance passes in NYC, which occur most often on the streets and sidewalks of Manhattan, and other symbols of intimidation;
- (j) Vehicular intimidations continue. including pop-outs, blind crosses, high speed bus and truck travel paths and narrow misses, and aggressive electric scooter passes, with the April 14, 2024 profanity above at was delivered together with a rapidly accelerating and swerving gray sedan which was idling in the left lane adjacent to a New York City cab in the right lane thus blocking the street from other traffic (undercover defendant NYPD vehicles and drivers) in New York City about 150 feet west of Broadway Avenue on West 61st Street around 2PM, with the verbal element delivered as always from behind the Lead Plaintiff as he crossed the street diagonally to the west in front of the two vehicles (this is written on April 20, 2024);
- (k) Episodes of physical bumps and other contacts, often while being adrenaline (fight or flight) hijacked by the illegal BRMT bioweapon and bioweapon delivery system, typically in NYC, for example on late Saturday evening, October 8, 2023, Times Square, and eastbound on 42nd Street on January 3, 2024;

- (l) medical injury and medical collapse narrative construction attempts, including previously dismissed heart issues being resurrected by doctors which were previously identified as non-issues related to normal aging (paragraph 710, LETHL-17);
- (m) colon blockages to biomedically threaten life and long term health began in late summer 2023 (paragraph 710, LETHL-17), and incorporated medical indifference sequences including a primary care physician walk-off by PATEL, LPEE pages 11656-11664;
- (n) Two severe focused pain mini-torture BRMT attacks of 5 and then 15 minutes to the upper outer tendon of the right knee during a live performance at the September 23, 2023 Wynton Marsalis concert (paragraph 607 HEXP-4), and other biomedical threats and harassment, as well as technical hacks and harassment, detailed at LPEE pages 11653-11670;
- (o) Numerous BRMT driven slips and trips over curbs, stairs and manhole covers which have and continue. This listing will be updated from November 1, 2023 to the present time during the initial scheduling and motions process as needed as the incidents described in this paragraph continue to occur.

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Interline Exhibit 15: Indirect Verbal Threat and Subsequent Lethality Events

Related to the July 16 through November 19, 2022 sequence only, prior and subsequent lethality attempts are described elsewhere in paragraphs 694-710 LETHL-1 through 17



IE 15A. First, An Indirect Verbal Threat –

An unknown male voice behind Lead Plaintiff delivered an indirect verbal threat, ("what are we going to do with you"), during intermission as Lead Plaintiff remained in the front row of this small theater. Since the set up on entry was quite familiar, open seating in a small rentable performance space, and a tall white female in her late 30s to early 40s sitting alone in the only two seat row which was directly ahead of the entry to the theater on the far wall (single white female empty adjacent seat is a recognized classic police powers tradecraft signature seem often in various parts of the US over many years of travel across 44 states), and there had been previous in-house productions (with police powers officers as actors) where Lead Plaintiff was likely the only invited guest with all others being police powers personnel and friends, this was a rather obvious deliberately set up scenario and sequence, with an in-house theatrical production,

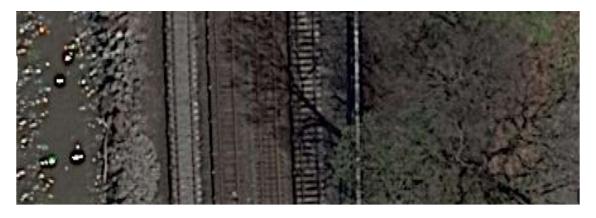
arranged for the specific purpose of delivering that particular indirect verbal threat at intermission.

IE 15B. Second, A Mass Casualty Attempt On A MTA Hudson Line Express Train –

Approximate area of attempted express train derailment on September 11, 2022. The train engine's collision with tree was heard soon after an emergency stopping procedure began and the tree's remains banged against the car where Lead Plaintiff was seated, about 3 to 4 cars several behind the engine at approximately 7:15 pm as the train traveled south at 50 to 60 mph into the just set sun (sunset was at 7:11pm). Initial eye adjustment from light to dark requires about 5-8 minutes, so the train engineer's night vision was limited at the time of the collision and potential derailment. There was no wind, rain, or excess moisture to account for any natural tree fall at this particular time and the track is used frequently throughout the day by commuter rail trains in both directions, indicating careful planning and timing of the tree fall after other passenger trains had passed through was needed for maximum effect. Hundreds of passengers and crew were on board this prime time Sunday evening return to NYC. To reach the track being used by this southbound express train, the tree fell across at least three tracks of the four track mainline adjacent to the Hudson River in this approximate area:



A view of the typical railroad mainline running immediately adjacent to the Hudson River on its eastern bank in this area. The southbound express track is second from left, about twenty feet from the Hudson River on the far left:



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IE 15C: Third, A BRMT Assault in Morningside Park, NYC follows – where Lead Plaintiff somersault fell on the fifth in a series of granite staircases six days later on September 17, 2022 at 7:29 pm (sunset was at 7:01pm):

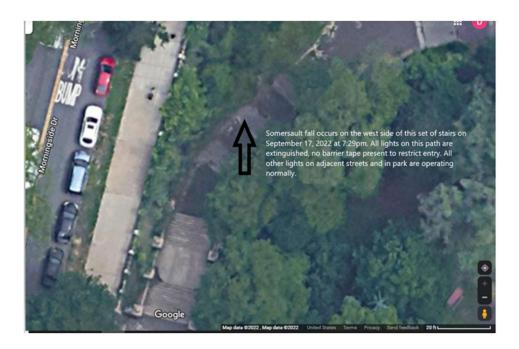


The path Lead Plaintiff walked from a very brightly lit taco restaurant at 109th and Morningside Drive to the southwest corner of Morningside Park. The red facade taco restaurant on the right is where Lead Plaintiff purchased a meal. It has very bright fluorescent lighting. The distance from this restaurant to the Morningside Park entry shown below is 250 feet, about 45-50 seconds to adjust from very bright light to a very dark path which is shielded from other area antique low wattage street lighting by a heavy tree cover over the path. A typical adjustment period from bright task lighting to moonless nighttime darkness is about 5 to 8 minutes, according to most sources.



Despite this bright light abrupt transition to dark of night partial night blindness, Lead Plaintiff successfully negotiated the first four sets of darkened stairs before BRMT was used.

Then, his head was forced upright, looking ahead rather than down to see the next lead step and his walking pace was quickened just prior to the somersault fall. He struck the lead step about mid-arch rather than with his toes and somersaulted head over heels to land on his back on the set of stairs shown below:



Area street lighting here is old fashioned lantern style low intensity electric lighting with a dense canopy of leaves on the trees in mid-September. The overhead path lights were deliberately turned off and it was extremely dark at 7:29PM. Sunset had happened at 7:00 pm, and "West Side Story" was due to start at 7:30pm. The BRMT commanded somersault head over heels fall resulted in injuries (which head injury was still visible and noted by staff many months later during a head and neck visual exam during an appointment at Bergen Community College Dental Hygiene Program visit) – a head injury, potential concussion, injuries to hands and knees:





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IE 15D. Fourth, A Vehicle Rundown Sequence In New York City and North Bergen, NJ

A vehicle rundown sequence occurred after dark on November 18 and 19, 2022: First in New York City on November 18, 2022. See the Google street views below: W 21st St from 8th Avenue, looking east at top, west at bottom, with images captured in August 2022. Note the streetlights on the right side of street (top), on left side of street (bottom). Both this street and W 22nd Street were completely dark with no streetlights operating as Lead Plaintiff walked along 8th Avenue to and from the West 23rd Street subway station to, then from, a theater production on West 20th.





The following night in North Bergen, NJ, November 19, 2022, part two of this vehicle rundown threat sequence occurred in the WALMART Parking Lot, North Bergen, NJ after dark. BRMT again freezes Lead Plaintiff's head, this time looking toward a Wendy's restaurant entry door as a distant white compact sedan, which accelerated rapidly from its slow pace when

initially checked to a panic deceleration about 15 feet away just as it entered left peripheral field of vision, then a final stop about 5 feet short of striking Lead Plaintiff.



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IE 15E. Fifth, A Report Was Made, Met As Always With No Response, Only Official Silence

An excerpt from Lead Plainitff's September 19, 2022 letter to SDNY is shown below (see the full text in the December 2021 to October 2023 series of more than 40 letters, at LPEE pages 786-793):

RE: Defendants' Continuing Lethality Threats and Attempts; Clarification on September 16, 2022 Letter from total to partial evidence destruction

Good day -

Latest physical incident in the local area involving me:

9/17/2022 7:29pm SW corner Morningside Park, NYC - tumble on staircase about midway down to ballfield level. Full somersault from top of flight of stairs, landed on backside about halfway down flight. No lighting on that southwest stairs pathway with extended landings and a sequence of steps from street level down to ballfield level, screened from all area ambient lighting by dense tree cover so it was extremely dark. All other streetlights and park lights were operating at the time. West Side Story, Spielberg movie, shown outdoors on Ballfield 1. Injuries include scrape and hematoma on left side immediately below hair line and on left cheek, left hand (outside) scrape at left side of left wrist, left hand (palm) scrape at base above wrist, sore thumb, torn pants left knee, bloody left knee scrape, moderately sore knee and hip left side, scrape on right hand at base of thumb, small scrape on right side tip of right index finger, sore lower back muscles mostly on left side. It is unclear if my attention was BRMT frozen in a head up position instead of looking down at stairs at the moment of step (a normal distance stride of the left foot on flat ground) which led to loss of balance with only back half of foot landing on top stair, though that is best recollection of that moment foot, but also possible my eyes were BRMT closed immediately prior to the tumble. Notes made at 11:35pm 9/17/2022. Accompanying photos taken at 8:40 AM 9/18/2022 and left hand 2 (thumb area on back of hand) at 10:10AM. Also, moderately sore neck noted on morning of 9/18/2022.

Page 1 of 3

[Intentionally left blank.]

538. These events are specifically described in the lethality attempts LETHL series at paragraphs 694 through 710 LETHL-1-17. These numerous direct threats to life are the third of these defendants' five basic illegal patterns of practice.

539. Paragraphs 539 is reserved.

4. FOURTH, Defendant UNITED STATES Sustains Involuntary Servitude

540. Defendant UNITED STATES has and does demonstrate, though it patterns of continuous surreptitious contacts with Lead Plaintiff and the official silence of federal police powers including all elements of defendant DOJ, its intent to continue to sustain its control and involuntary servitude of these plaintiffs. Undercover personnel and technology surveillance of Lead Plaintiff have been and are sustained without consent in continuous full public view through disguised entities and perpetual prejudicial operations. This pattern began in elementary school, at least by Lead Plaintiff's sixth grade if not sooner paragraphs 490, 717, and has and does continue into the present time for all forms of personal contact, as defendant undercover personnel are a constant and continuous presence at all times and make repeated contact attempts at both orchestrated events in public venues where they control seating and adjacent contact, stage events which are affordable to Lead Plaintiff and are not open to or listed for the public, and constrain web searches and contacts available for prospective personal relationships.

541. Defendant UNITED STATES has and does accomplish involuntary servitude through key on-going contacts which have been sustained both by personal contact by various technical means summarized at paragraphs 600 NSEC-1; 608, 614, 617 HEXP-5, 11, 14; 626-634 RGTS-6-16; 639, 640, 645 RICO-1, 2, 7; 694-710 LETHL-1-17, and by personnel assigned to continuously sustain personal and professional relationships with Lead Plaintiff including, without limitation, the following key personnel and their roles:

Table: Key Contacts- Involuntary Servitude Of Lead Plaintiff

Cover Name and Actual DEFENDANT name,	Contact Period and Role	Probable/Known Federal Department
where known		or Agency
Various Embedded Student, including Shawn Morrissey (KATYAL), Thomas GRADY	Decatur High School students 1970- 1973	DOJ, likely USMS or FBI
Donna DICKOVER and David BRUNTON	Green River Community College 1973, Washington State University (WSU) students 1974-1977	USMS
William SACKVILLE- WEST	WSU Perham Hall 1974, and continuing relationship into 2005, while apparent son of BREYER	USMS
Craig J. PAGE	WSU Perham Hall 1974, WSU apartment roommate 1975-1977, and continuing relationship into 2005	USMS
Harold A. HOPPER	Deloitte Seattle Consulting Partner and direct supervisor from 1979-1985	USMS
Gerald L. THORPE	WSU MBA program from 1978, Deloitte Seattle co-worker and personal relationship into 1989	CIA
Lyle Whiteman (WEISSMAN)	Puget Consumers Cooperative General Manager during Lead Plaintiff's three year PCC Board of Trustees term from about 1981-1984	FBI
Chuck LeFevre (ROSENBERG)	NutraSource CEO during Lead Plaintiff's three year NutraSource Board of Directors term from about 1983-1984. Lead Plaintiff provided NutraSource consulting services from about 1989-1995	FBI
David P. Moller (STONE)	Deloitte Seattle co-worker from 1983, LazerSoft direct supervisor, and personal relationship into 1987	CIA
Darrell PRAY	NutraSource CIO from about 1985-1997. Direct report at Pacific Pipeline in 1996. Direct report at CNA from about 1997-2002. Allegent LLC comanager from 2002-2005.	FBI or USMS
Michelle Yarbrough (RUBIN)	Sister-in-law by marriage to Jeanette from 1990-2005.	FBI
Paul Yarbrough (Andrew VINDMAN)	Brother-in-law by marriage to Jeanette from about 1992-2005.	ARMY

Cover Name and Actual DEFENDANT name, where known	Contact Period and Role	Probable/Known Federal Department or Agency
Greg Yarbrough (Yvgeney VINDMAN)	Brother-in-law by marriage to Jeanette from about 1992-2005.	ARMY
Wes Lewis (MELBER)	Romantic interest, then husband to Theresa, Jeanette's half-sister, from about 1993-2005.	FBI
Linda HURD	Pine Street Inn contact, assigned to Boston, MA homeless shelter in Dorchester, MA 2006-2007	USMS primary contact, other USMS rotating undercover personnel co-housed in shelter system
William Drumm (ROSENBERG)	ESTABLISH General Manager and direct supervisor 2007-2008	FBI
Marc CHALOM	Cliffside Park NJ Landlord	USMS
Emil SCHMIEDHAUSER	Assigned roommate in Ramsey, NJ apartment from 2011-2018.	USMS
Raymond SULLIVAN	Corporate attorney for Winnett startup from about 2012-2021.	Former DHS CPB
DEAN T. SMITH	Investor in Winnett startup from 2015-2019, then litigant from 2019-2021.	FBI
REMOTE PERSONNEL	Continuous public surveillance and comprehensively managed surrounding environment from 2018 to present.	USMS, FBI, CIA, ARMY

542. Defendant UNITED STATES pattern of perpetual sustained contact from approximately high school to the present demonstrates *mens rea*. This continuous and sustained involuntary servitude through continuous direct personal contact by assigned personnel, sustained discriminatory and prejudicial operations, and surreptitious constraints on other relationships including, without limitation, by direct personal means and by technical means, is the **fourth** of these defendants' five basic illegal patterns of practice.

- 543. Paragraphs 543 through 549 are reserved.
- 5. FIFTH, Fraudulent Concealment And Willful Blindness Sustain Obstruction Of Justice And Illegal BRMT Bioweapon Development And Use Against US Persons

Fraudulent Concealment

550. Lead Plaintiff's entire existence has been and is involuntarily committed to this associated-in-fact criminal enterprise of defendant UNITED STATES in its racketeering acts and conspiracy against rights including, without limitation, (a) his employment and employment deprivations, (b) direct interventions in his private life, (c) human trafficking of both the Lead Plaintiff and his two spouses, (d) repeated racketeering offenses, including (e) thefts and orchestrated forfeitures and compromises of financial, real, and intangible assets, (f) involuntary servitude, (g) forced labor, (h) peonage, which have and do run concurrently with (i) illegal human experimentation and (j) lethality attempts, and (k) with other crimes, acts, violations, and injuries, as documented in the 110 example sets of depredations by defendant UNITED STATES and its co-conspirators, over nearly six decades against Lead Plaintiff alone and still longer for some members of this class of plaintiffs.

551.Defendants FBI, USMS, USSS, DHS, CPB, DOD, DARPA, as well as other departments and agencies of defendant UNITED STATES, have and do know of CIA and ARMY's illegal mind control program (BRMT, the prohibited bioweapon and bioweapon delivery system) and have and do directly conspire in illegal acts, violations, and injuries of these plaintiffs. These defendants have acted continuously, knowingly, and willfully to initiate and perpetuate their illegal BRMT bioweapon and bioweapon delivery system, constitutional and civil rights, and racketeering acts, violations, and injuries against the constitutional, civil, and human rights of these plaintiffs. Other elements (departments, agencies, task forces, offices, and so forth) of defendant UNITED STATES have and do use these same unwitting victims of defendants CIA and ARMY illegal BRMT and related illegal human subject medical experiments in their own victimizations in involuntary servitude and in other depraved acts. Defendant UNITED STATES has and does conspire with others to fraudulently conceal these illegal acts,

violations, and injuries, and to fraudulently conceal its own and co-conspirator culpability in this pattern of racketeering, lethality, and criminal entrapment attempts, effectively perpetually attempting to transfer the criminal liability of these defendants to the unwitting plaintiff victims of this calss. The continuity of this pattern from illegal BRMT program inception by defendant UNITED STATES' and its co-conspirators is documented herein at all paragraphs.

552. All these malign acts, violations, and injuries have been fraudulently concealed for more than five decades, hiding behind extra-legal color of law abuse, wherein (a) <u>defendant</u>

<u>UNITED STATES claims national security "state secret" privilege is the legal foundation of an illegal program</u> and (b) of the associated-in-fact enterprise pattern of racketeering acts and of (c) violations of "unalienable" constitutional rights, which both run concurrently with the illegal program and wherein American citizens' repeated complaints are met with durable repeated official silence by the department constitutionally obligated to establish justice, defendant DOJ, by its agencies and by all other departments and agencies of the executive branch (paragraph 320, LPEE pages 508-541):

From: DNI-FOIA < DNI-FOIA

Sent: Tuesday, November 16, 2021 1:23 PM

To: 'Dennis Brewer'

CC: DNI-FOIA

ONI-FOIA

Subject: RE: FOIA/PA Request

Attachments: RE: FOIA/PA Request; RE: FOIA Requests Involving US Federal Police and Intelligence Agencies DF-2021-00179

Good afternoon, Mr. Brewer,

Our 26 October response (attached) reiterated what was stated in our 9 September final response to your Privacy Act request, which was that we searched ODNI's Security, Personnel, and Human Resources files and no records on you were located. Our final response was initially emailed to you on 10 September (attached) and was also included in our 26 October response.

A search was not conducted of the ODNI elements you mentioned: the National Counterterrorism Center, the National Counterintelligence and Security Center, and National Counterproliferation Center. Investigation and collection records are protected under exemptions (b)(1) and (b)(3), and ODNI can neither confirm nor deny that such records may or may not exist.

Thank you,

DNI-FOIA

while defendant UNITED STATES has and does engage its co-conspirators in a long-running elaborate conspiracy which abuses US persons, just at it has done with MKUltra (1953-1973)

and Cointelpro (1956-1971) which malign pattern of practices has and does functionally continue, in technologically updated forms, against US persons as it perpetually delays and denies justice by:

- (i) disposing of documentary evidence by mail fraud, acts of time destroying physical evidence including, without limitation, banking and medical records, as related, without limitation, at paragraphs 102 (iii), 308, 320, 415, 462, 474, and
- (ii) obstructing, blocking, and hacking of email accounts and web sites as related,without limitation, at paragraph 515 and,
- (iii) by on-going entanglements, pretexting, interferences, obstructions, and entrapments as related at paragraphs 600-603 NSEC-1-4; 621-627 RGTS-1-7; 639-693 RICO-1-55 herein,
- (iv) fraudulent concealment and willful blindness as related in this section at paragraphs 550-583
- (v) orchestrating and using naturally appearing "accidents," including, without limitation, the hospital fall in April 2021 (paragraph 706 LETHL-13, a mass transit express train derailment attempt on an MTA Hudson Line passenger train just as the sun was setting on September 11, 2022, (paragraph 707 LETHL-14) to destroy eyewitnesses to the godawful truth these defendants, particularly defendant UNITED STATES have created and perpetuate.
- 553. The institutional and individual defendants in this Complaint have been and are directly involved in a conspiracy against rights and law, have and do deliberately ignore their Constitutional and legal responsibilities to US persons under law, both by inflicting the acts, violations, and injuries herein through their direct and specific actions, and by their failures to act

against these same defendants. Defendants have and do make every effort, and use vast sums of taxpayer resources, to fraudulently conceal their identities throughout while, and by, abusing police powers and national security exemptions and privileges, they have and do act in bad faith in their imperfect conspiracy and cover-up attempts.

554. Over the life of this conspiracy, these specific bad faith actor institutional and individual defendants have elected to expand their circle of co-conspirators to other police power agencies and eventually to a public mob of participants. Defendants' malign pattern of practice has and does include placing the Lead Plaintiff unwittingly and involuntarily in full public view through, among other things, surreptitious technical hacks of computer video feeds and continued human trafficking of Lead Plaintiff. A record of certain recent official lies and coordinated cover-up attempts by police powers agencies is included herein as Interline Exhibits 16-19. Neither defendants CIA, ARMY, or NARA has ever even acknowledged receipt of written Freedom of Information Act and Privacy Act requests for information from Lead Plaintiff, as required by law (LPEE pages 387-412, 508-541). All these defendants are perpetual scofflaws who have and do routinely violate federal law without consequence for their criminal acts; operate in bad faith throughout the conduct and attempted cover-up of this entire illegal BRMT bioweapon and bioweapon delivery system program; associated-in-fact enterprise pattern of racketeering acts; constitutional and civil rights violations; and the associated illegal spying and surveillance used in violations of the Constitution against still other US persons through defendants' illegal color of law abuse of cover companies, and by co-opting private enterprises for illegal uses, and to obtain direct personal benefits; and by their abuse of relationships with foreign intelligence agencies to operate against US persons.

Interline Exhibit 16: August 2021 58th Anniversary MLK "I Have A Dream" Speech Lincoln Memorial Permit Allegedly Cancelled by Organizer – FALSE FOIA Response to **Cover First Amendment Violation**



United States Department of the Interior

NATIONAL PARK SERVICE Interior Region 1- National Capital Area 1100 Ohio Drive, S.W. Washington, D.C. 20242

FOIA 2021-6105

September 22, 2021

Mr. Dennis Brewer 1210 City Place Edgewater, NJ 07020 dsbrewer923@hotmail.com

Dear Mr. Brewer:

Subject: Freedom of Information Act Request Dated September 20, 2021 National Park Service (NPS) re: National Mall and Memorial Parks

This letter is in response to your Freedom of Information Act (FOIA) request dated September 20. 2021, in which you requested: "On August 28, 2021, I attended a voting rights related event on the National Mall adjacent to the National Archives Building. I am making a FOIA request to identify the sponsors of that event. This event occurred at the same time as another voting rights event at the Lincoln Memorial. Please let me know if you require other information from me prior to fulfilling my FOIA request. Thank you."

The following response was prepared by the National Capital Area through consultation with the division of Permits, National Mall and Memorial Parks. The FOIA, 5 U.S.C. § 552, generally provides that the Government shall make documents available to the public for inspection and copying to the widest extent possible. However, certain classes of documents may be exempt. The FOIA does not require that new records be created in response to a request and only applies to records in existence at the time the request is received. Additionally, because the NPS creates and maintains law enforcement records, we are required by the Department of Justice to provide the following information, even though it may or may not apply to your specific request. Congress excluded three discrete categories of law enforcement and national security records from the requirements of the FOIA. See 5 U.S.C. § 552(c). This response is limited to those records that are subject to the requirements of the FOIA. This is a standard notification that we are required to give all our requesters and should not be taken as an indication that excluded records do, or do not, exist.

We have enclosed 2 pages of records that are responsive to your request which are being released to you in full.

We have classified you as "other" requester. However, we do not bill requesters for FOIA processing fees when their fees are less than \$50.00, because the cost of collection would be

INTERIOR REGION 1 . NORTH ATLANTIC-APPALACHIAN CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, PENNSYTYSONIA, RHODE BELAND, VERMONT, LP Evidentiary Exhibits Page 000532

10/05/2022

Fraudulent Concealment - NYPD and FBI Coordinate Cover-Up of Human Trafficking, Pre-Texted Investigations

555. Defendant NYPD confirmed the 2007 era counterterror investigation (which was fraudulently constructed by defendant FBI, specifically including FBI serial human trafficker ROSENBERG and his specifically targeted acts, violations, and injuries against Lead Plaintiff from the 1980s through the first decade of the 2000s (paragraphs 213, 320f(v), 416, 425, 432-440, 452-470, 474, 482, 497-498, 516-519, 536, 541(table)) against Lead Plaintiff on September 3, 2021 (Interline Exhibit 17) but refused to produce the information, which refusal was appealed by Lead Plaintiff. In NYPD's September 15, 2021 reply to Lead Plaintiff's appeal of the refusal to produce, Defendant NYPD then stated there was absolutely no record whatsoever of any contact with Lead Plaintiff nor any records indicating any such investigation, plainly a baldfaced lie. An FBI liar letter then followed on September 30, 2021 (Interline Exhibit 18). See also LPEE pages 354-367, 799-802, and 10302-10304, 11498-11501. This was a coordinated 27 day cover-up after the initial accurate admission.

556. Defendant FBI Headquarters issued that September 30, 2021 denial letter below (Interline Exhibit 18) on September 30, only 15 days after defendant NYPD disappeared its records from their system. These are obvious official lies by both defendants FBI and NYPD were clearly coordinated, and may constitute criminal obstruction including destruction of evidence. This sequence disavows and removes from the evidentiary record key evidence of human trafficking and involuntary servitude over time, as well as of carefully pretexted illegal national security entanglements which demonstrate *mens rea*, to wit:

557. Lead Plaintiff's direct supervisor at ESTABLISH, William Drumm, was identified in September 2023 as Charles "Chuck" ROSENBERG, now a law professor and an MSNBC legal analyst. As an FBI official during Lead Plaintiff's tenure at defendant ESTABLISH,

defendant ROSENBERG was Lead Plaintiff's human trafficker, interviewer, and hiring manager. Defendant ROSENBERG had previous undercover history with Lead Plaintiff dating back to the early 1980s when the first known lethality attempt against Lead Plaintiff was attempted in British Columbia, paragraph 694 LETHL-1, while ROSENBERG (FBI illegally embedded as CEO at NutraSource by WEISSMAN), WEISSMAN (FBI illegally embedded at Puget Consumers Cooperative), and BURNS (CIA allegedly practicing medicine in Kirkland, WA) were in the Seattle, Washington area.

558. FBI Headquarters would have known ROSENBERG moved from FBI Anchorage field office cover to this Seattle, WA cover legend as Chuck LeFevre (ROSENBERG) in the early 1980s to become CEO of the startup natural foods wholesaler and FBI spying operation at NutraSource. ROSENBERG joined Andrew WEISSMAN, later FBI General Counsel to Robert Mueller, who was a deep cover agent known as "Lyle Whiteman" to Lead Plaintiff while engaged in illegal embedded spying as General Manager of Puget Consumers Coop in Seattle.

559. WEISSMAN "Lyle Whiteman" was directly responsible for the loss of hundreds of thousands of dollars of PCC member equity in the cooperative by his planning, opening, and operating of a failed PCC retail grocery store in South Everett, which was a continuing cash drain for about two years on PCC's limited resources, due to the inappropriate fit of "white collar college-educated" natural and organic foods market appeal to the "blue collar" demographic profile of the South Everett customer base (many of whom were Boeing Everett assembly plant workers and technicians), which "Whiteman" would have the requisite knowledge and training to determine given his prior experience while illegally embedded in grocery wholesaling and retailing in Seattle, WA at Associated Grocers and PCC. Lead Plaintiff served on the Boards of PCC and NutraSource for about three years in the early 1980s.

560. NutraSource was formed from the bankruptcy court wreckage of three natural and organic foods wholesalers in Seattle. The Board of NutraSource also included two white males from Oakland Food Coop which was in the late stages of being financially ruined under their supervision by internal dissension, a classic defendant FBI wrecking operation subsequently experienced repeatedly and unwittingly by the Lead Plaintiff during his involuntary servitude, forced labor, and peonage by defendants USMS, FBI, CIA, and by defendant ARMY using its personnel in civilian dress. These defendant UNITED STATES departments and agencies, and their individual officers, agents, managers, and executives are substantially responsible, and institutionally and individually liable, for the bad faith acts, violations, and injuries of the various personal and professional wrecking sequences in Washington state, for national security entanglements there and elsewhere in the United States and foreign countries, for human trafficking to Boston and homelessness, thence human trafficking to New Jersey for fraudulent employment, involuntary servitude perpetuation, and pretexted terror color of law abuses. They acted knowingly, willingly, and perpetually, in *prima facie* violations of the rights and property of these unwitting plaintiffs through their acts, violations, and injuries conducted in bad faith under color of law. abusing their positions of trust and authority.

561. Subsequent to the defendant NYPD and FBI cover-up sequence at Interline Exhibit 17 (NYPD) and Interline Exhibit 18 (FBI Headquarters), Lead Plaintiff wrote to the DOJ Assistant Inspector General for Investigations and received a no interest reply, provided a response to the no interest letter, and received no further acknowledgement. This DOJ IG sequence is shown at Interline Exhibit 19. Other personal entanglements present conflicts for current senior members of defendant DOJ. Several of these defendants have direct illegal program concurrent involvement ties to current and/or former senior DOJ officials including

current Attorney General GARLAND, which ties include, without limitation, defendant WEISSMAN, a former FBI General Counsel while both attended the Lead Plaintiff in roles in the 1970s under defendant BREYER (paragraph 36). Defendant CALDWELL, recently retired from Latham & Watkins was Assistant Attorney General for DOJ Criminal Division some years after her false personation at Seed & Berry in Seattle, Washington to fraudulently conceal a fraudulent business partnership between PRAY and then unwitting Lead Plaintiff, known as Allegent, LLC (paragraphs 36, 461-462, 639, 641, 650, 673, 683 RICO-1, 3, 12, 35, 45).

562. Individual defendants, and former FBI and DOJ personnel WEISSMAN, RUBIN, and MELBER are known current residents of the greater New York City/New Jersey area where defendant has lived since his human trafficking to New Jersey by ROSENBERG in 2007.

ROSENBERG lives in the Washington, DC area. All these defendants also have or do work at various times since leaving Washington state for defendants FBI and/or DOJ in northern New Jersey or New York City.

563. Defendant FBI and/or USMS (New York or New Jersey) is the most probable source of the continuing block of emails in accounts owned by the Lead Plaintiff's between 2018 and July 2020, which includes, without limitation, further evidence of human trafficking of Lead Plaintiff by federal and state agencies, as well as defendant FBI racketeering acts by defendant MAGGARD and others. Other inculpatory content remains to be discovered through the removal of this technical block by defendant UNITED STATES. Defendant FBI in the greater NYC area has and does run illegal interference in interstate commerce against the Lead Plaintiff and has been joined in this operation by FBI Amarillo using the cover company CFO SEARCH operated by MAGGARD (FBI, paragraphs 624 RGTS-4, 670, 672, 682, 689 RICO-32, 34, 44, 51). This pattern is consistent with FBI's past pattern of practice against Lead Plaintiff in his prior

commercial endeavors from 1983 (ActivLabor scheduling software and Sheldon-Lee Associates, formed with defendant CIA embed THORPE). This racketeering pattern sequence against the Lead Plaintiff involved agents in the New York City Manhattan office posing as the principals of SOLE SOURCE Capital. SOLE SOURCE principals ROSSI and TURNER verbally promised a major investment in a meeting with the Lead Plaintiff at the St. Regis Hotel bar, New York City, on January 9, 2018, then reneged including through a phone call on January 23, 2018. As is defendant FBI's custom, those fraudulent investment promises were made verbally in the presence of a team of agents (four in this meeting) and then reneged in writing (email) sometime later. This generally occurs after weeks or months of delay, which are intended to string out and distress the target, regardless of whether or not there is any valid basis for FBI actions (none here, merely interfering in interstate commerce without cause), in the vain hope the target (Lead Plaintiff here) will violate some law or regulation so they can perpetuate their malign activities. When this fails, they terminate within 90 days to evade the inspection process and then rotate the responsibility to another team in another location or pass it off to another department or agency to perpetuate predatory color of law abuse of US persons.

564. In this scenario, FBI New York chose to rotate that role to FBI Amarillo. CFO SEARCH, operated by Mike MAGGARD in Lubbock, Texas, was the vehicle of choice used by FBI Amarillo. CFO SEARCH then recruited an Egyptian foreign national for consideration as CFO of Winnett, which company the Lead Plaintiff was attempting to start in interstate commerce. This particular CFO nationality "coincidence," and a series of halal beef certification requests by international traders to Sheldon Beef during other attempts at international commerce by Lead Plaintiff were made by FBI through other offices and correspond with the Egyptian influence peddling allegations which relate to the alleged corrupt relationship between Hana and

Menendez in the September 2023 Menendez indictment. This is now well understood by the Leac Plaintiff to be a classic FBI "rhyming" signature trademark, which has been noted as occurring repeatedly in the past during forensic analysis of this long-running associated-in-fact enterprise pattern of human trafficking and other racketeering acts which affect interstate commerce conspiracy conducted by defendants FBI, USMS, ARMY, and CIA, together with their co-conspirator state and local governmental and private sector defendants.

565. After months of captive fruitless financing attempts by Lead Plaintiff which included technical electronic blocking (wire fraud) by defendants, defendant MAGGARD provided \$6,000 (FBI, using agency funds) for Lead Plaintiff's business use to develop a website, which the developer never completed. ENVOTEC, (paragraph 682 RICO-44) allegedly a Pakistani web development firm, performed this work; incomplete software projects are a common experience across FBI operations against captive targets like the Lead Plaintiff as tasks are not allowed to proceed to full completion, there is always one more thing and not quite enough funds are ever available to complete these tasks and projects (this pattern of practice dates back to the CUC project at CNA, paragraph 458). MAGGARD also provided \$6,000 (FBI, agency funds) to the Lead Plaintiff as a personal loan, which Lead Plaintiff used in a good faith effort to retire credit card obligations in an attempt to improve his personal credit score, so Lead Plaintiff could co-sign for a business related loan. MAGGARD then solicited advice about whether to lie during a loan application process, yet another entrapment effort. Lead Plaintiff advised against any such move by MAGGARD.

566. This captured interstate commerce business project, Gannett Peak Ranch failed, with much manufactured defendant FBI drama throughout the process as usual during 2023, as had the numerous personal attempts of the Lead Plaintiff since 2011 (and those before dating back to

Sheldon-Lee in 1983-84, paragraph 428) to engage in interstate commerce which preceded this attempt. These good faith acts by the Lead Plaintiff, part of his 40 year pattern of good faith acts and attempts in interstate commerce, left FBI Amarillo with no legal pretext to continue its prejudicial operations, and with a problem directly traceable to defendant MAGGARD and the CFO SEARCH cover operation - the \$6,000 personal loan to the Lead Plaintiff. Interest needs to be paid on the loan in order to avoid it becoming taxable income to the Lead Plaintiff. This interest payment was made in good faith in early 2023 and again in 2024 when monthly payments began in arrears. This leaves the loan outstanding and avoids the requirement to declare the loan as personal income (required if defaulted), which would risk the Lead Plaintiff's Section 8 voucher through a failure to properly report his income or by reporting income (a dishonored loan) which exceeds the eligibility requirement to continue to receive the Section 8 voucher which may result from properly reporting any loan default as income. Either of these outcomes could lead to forfeiture or a substantial reduction of the Section 8 voucher benefit amount, which voucher is required to maintain his residence since defendant UNITED STATES has diligently operated to sustain both involuntary and peonage of Lead Plaintiff since elementary school (paragraphs 36 table, 717). This was most probably the real purpose behind this particularly implausible defendant FBI scheme, as they worked to get the matter their books and onto the victim (Lead Plaintiff). This would have forced the Lead Plaintiff from yet another in his series of defendant UNITED STATES' secretly owned human trafficked residences and again result in the loss of some or all of his minimal personal property (yet another defendant DOJ pattern of racketeering acts practiced repeatedly experienced by Lead Plaintiff at the hands of defendant FBI and USMS episodically since graduate school in 1979).

567. To cover these tracks made and sustained using SOLE SOURCE and CFO SEARCH, and the MAGGARD loans, defendant FBI adopted the next tack in their strategy to get these open matters off their books in early February 2023. A Whistler, British Columbia condominium timeshare, formerly jointly owned by Lead Plaintiff and his fraudulently orchestrated second wife Jeanette, was suddenly presented for release of interest, (i) eighteen years after the 2005 divorce which had specifically released that interest from the Lead Plaintiff to former spouse Jeanette through that divorce, (ii) despite the ownership interest in the timeshare condo reportedly never having been officially recorded in British Columbia property registry as required by law, and (iii) reportedly never even having appeared on the ownership records of the condominium association.

568. This release of the timeshare interest potentially generated a slightly more than \$6,000 USD capital loss to the Lead Plaintiff in 2023, which is approximately equal to the \$6,000 MAGGARD personal loan value. This incentivized a default by Lead Plaintiff on the defendant FBI Amarillo MAGGARD loan, as the capital loss on the timeshare condominium interest would offset the income effect of a default on the personal loan from defendant MAGGARD, thus taking it off defendant FBI's books so the matter could be closed, concealed from any internal inspection process, and the evidence destruction period could result in its removal from accounting records, leaving no trace of this color of law racketeering act by defendant FBI.

569. Since Lead Plaintiff has come to more clearly recognize these defendant UNITED STATES pattern offenses and evidence destruction practices (FBI and USMS in particular) through his continued forensic review in 2023, he continues to decline any opportunity to default on this MAGGARD personal loan.

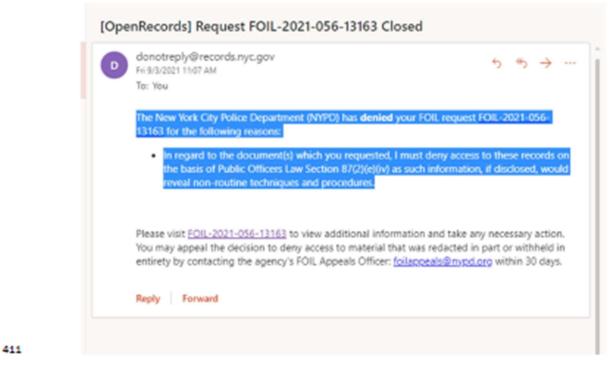
570. Litigation discovery using this pattern evidence will continue to demonstrate these continued predicate acts and pattern of acts, which are completely consistent with the other racketeering patterns in this complaint from prior decades, this time by using these defendants' own still available records. Meanwhile, the blocking of Lead Plaintiff's access to owned emails accounts which inculpate defendants SOLE SOURCE, VENDORCO, WALKER, HUSKEY, FBI, USMS, CIA, ARMY, other currently known and unknown co-conspirator agencies, departments, individuals, groups, organizations, and still others not yet understood, who acted against the interests of these plaintiffs during that currently blocked from access period in 2018 through 2020 continues. Evidence preservation letters were sent to defendant FBI and dozens of co-conspirator defendants beginning in 2021.

571. Generally speaking, the northern New York and New Jersey police powers environment at various levels of government has again become notably more hostile toward the Lead Plaintiff in 2021 to the present as evidence was presented to and met with complete silence from the US Attorney SDNY. Illegal BRMT and police powers operational intensity in 2023-2024 is similar to that experienced (a) in 2007-2010 during the defendants FBI, ROSENBERG, and co-conspirator terror, trafficking, torture, homelessness, kidnapping to confinement series was underway, and (c) in the repeat of multiple lethality attempts in the cycle in 2017-2021 described at paragraphs 701-706 LETHL-8-13. The 2021-2022 sequenced cover-up across police powers defendants is evidenced in the following exhibits and narrative below. The subsequent events in the timeline which follows (2022-2024) are dispositive evidence of the purpose and intent of this 2021-2022 cover-up documented in writing by defendants own hands:

[Intentionally left blank.]

DATE	DEFENDANT ACTIONS	DOCUMENTARY EVIDENCE		
2021				
September 3, 2021	NYPD FOIL response affirms irregular methods	Interline Exhibit 17		
September 11	DC complaint 21-cv-2424 filed on paper at Clerk's Office	Pacer.gov		
September 11	DC complaint 21-cv-2424 courtesy copy served before case assignment on DC US Attorney Civil Division	Paragraph 628A and LPEEV65- 10		
September 15	NYPD denies any knowledge of Lead Plaintiff whatsoever	Interline Exhibit 17		
September 30	FBI sends DC Headquarters "liar letter" response to FOIA request	Interline Exhibit 18		
October 12	DC US Attorney Civil Division email received declining courtesy service on September 11	Paragraph 628A RGTS-8, LPEEV65-10		
November 9	Lead Plaintiff letter to DOJ Assistant Inspector General – Investigations (DOJ IG)	Interline Exhibit 19		
2022				
January 28, 2022	DOJ IG replies to acknowledge receipt	Interline Exhibit 19		
March 22	DOJ IG replies indicating no subject matter jurisdiction	Interline Exhibit 19		
July 16 through November 19	Lethality veiled verbal threat in NYC is followed by multiple covert targeted violent lethality attempts	Interline Exhibit 15 for July 16 through November 19, 2022, also at paragraphs 707-710 LETHL-14-17, LPEEV65-11		
2022- Present				
2023	person at Clerk's office as video and electronic evidence is declined and denied from the record after defendant UNITED STATES disabling technical printer hack	Technical printer hack described at DC:21-mc-0014 docket on Pacer.gov and at Appendix 1.		
On-going	Defendant UNITED STATES continues its pattern of evidence tampering, hacking, operational harassments, and uses BRMT programmed health attacks for an on-going escalation of surreptitious lethality attempts and coercive psychological operations	Paragraphs 801, 816-818		

Interline Exhibit 17: Defendants NYPD and FBI Coordinate September 2021 Fraudulent Concealment



| March | | Ma

NYPD admits existence of records documenting FBI and ROSENBERG bogus pretexted alleged terror investigation on September 3, 2021 above, then denies any records on September 15, 2021, next page.

There are no responses available for this request.

On September 11, 2021, courtesy service of complaint DC:21-cv-2424 on the US Attorney for the District of Columbia was made by hand delivery. An email reply was received from that office on October 12, 2021 (LPEEV65-10).



POLICE DEPARTMENT Office of Deputy Commissioner, Legal Matters One Police Plaza, Room 1406A New York, New York 10038 FOILAppeals@NYPD.org

September 15, 2021

Dennis Brewer dsbrewer923@hotmail.com

> RE: FREEDOM OF INFORMATION LAW REQUEST: FOIL-2021-056-13163

Dear Mr. Brewer:

This letter is in response to your email, dated September 3, 2021, appealing the determination issued by the Records Access Officer (RAO) on September 3, 2021 regarding records requested from the New York City Police Department. Your request, pursuant to the Freedom of Information Law, was originally received by the FOIL unit on September 1, 2021 and subsequently denied pursuant to Public Officers Law §87(2)(e)(iv).

Your appeal of that determination is denied because a diligent search has been conducted for the requested records based on the information provided; however, no records were located. The New York Court of Appeals has determined that "[w]hen an agency is unable to locate documents properly requested under FOIL, Public Officers Law § 89(3) requires the agency to certify that it does not have possession of a requested record or that such record cannot be found after diligent search . . . Neither a detailed description of the search nor a personal statement from the person who actually conducted the search is required" Raittiey v. New York City Police Dept., 96 NY2d 873, 875; 730 NYS2d 768 (2001).

Furthermore, in 2009, the Appellate Division held that an agency cannot produce documents it does not possess or cannot disclose and that the Court cannot require respondents to produce documents that they certify they cannot find after a diligent search because petitioner "has received all that he . . . is entitled to under the law" Bernstein Family Ltd. P'ship v. Sovereign Partners, L.P., 66 AD3d 1, 8; 883 NYS2d 201, 206 (1st Dept 2009).

You may seek judicial review of this determination by commencing an Article 78 proceeding within four months of the date of this decision.

Respectfully.

Jordan S. Mazur Sergeant

COURTESY · PROFESSIONALISM · RESPECT

Interline Exhibit 18: Defendant FBI Sends Official Liar Letter in September 2021 Coordinated Fraudulent Concealment



U.S. Department of Justice

Federal Bureau of Investigation Washington, D.C. 20535

September 30, 2021

MR. DENNIS SHELDON BREWER 1210 CITY PLACE EDGEWATER, NJ 07020

> Request No.: 1505514-000 Subject: BREWER, DENNIS SHELDON

Dear Mr. Brewer:

This is in response to your Freedom of Information/Privacy Acts (FOIPA) request. Based on the information you provided, we conducted a search of the places reasonably expected to have records. However, we were unable to identify records responsive to your request. Therefore, your request is being closed. If you have additional information pertaining to the subject of your request, please submit a new request providing the details, and we will conduct an additional search.

Please see the paragraphs below for relevant information that may be specific to your request. Only checked boxes contain corresponding paragraphs relevant to your request. If no boxes are checked, the corresponding information does not apply.

Please be advised that your request was reopened based on the additional information you provided. A new search was conducted, and we were unable to identify responsive records.
Records potentially responsive to your request were destroyed. Since this material could not be reviewed, it is not known if it was responsive to your request. Record retention and disposal is carried out under supervision of the National Archives and Records Administration (NARA) according to Title 44 United States Code Section 3301, Title 36 Code of Federal Regulations (CFF Chapter 12 Sub-chapter B Part 1228, and 36 CFR 1229.10. Please be advised that the General Records Schedule (GRS) disposition authority for FOIPA records is DAA-GRS-2016-0002-0001 (GRS 4.2, Item 020).
Records potentially responsive to your request were transferred to the National Archives and Records Administration (NARA). If you wish to review these records, file a FOIPA request with NARA at the following address:
National Archives and Records Administration
Special Access and FOIA 8601 Adelphi Road, Room 5500
College Park, MD 20740-6001
Potentially responsive records were identified during the search. However, we were advised that they were not in their expected locations. An additional search for the missing records also met with unsuccessful results. Since we were unable to review the records, we were unable to determine if they were responsive to your request.
The portion of your request concerning an FBI identification record – commonly referred to as a criminal history record or "rap sheet" – has been forwarded to the Criminal Justice Information Services (CJIS) Division for processing. For additional information, see the enclosed FBI FOIPA Addendum General Information Section.

Requests for expedited processing are not applicable when a final response is issued within ten

LP Evidentiary Exhibits Page 000799

calendar days.

10/05/2022

	Decreases for criminal history records or ran s	search conducted was limited to FBI records, heets should be directed to Criminal Justice arding CJIS is listed in the enclosed FBI FOIPA
_	Records potentially responsive to your requer Center - Civilian Personnel Records (NPRC- at the NPRC, your request must be mailed to	at were transferred to the National Personnel Records CPR). In order to obtain information on a file located the following address:
	National Archives and Reco ATTN: Archival Programs P.O. Box 38757 St. Louis, MO 63138	ords Administration
includ	Please refer to the enclosed FBI FOIPA Adde	endum for additional standard responses applicable to indard responses that apply to all requests. "Part 2" I requests for records about yourself or any third party out FBI records that you may find useful. Also
Us." 7 in all	For questions regarding our determinations, the FOIPA Request Number listed above has be correspondence concerning your request.	risit the www.fbi.gov/foig website under "Contact en assigned to your request. Please use this number
States appea https: electr your a Appea	at, you may administratively appeal by writing to a Department of Justice, 441 G Street, NW, 6th F if through OIP's FOIA STAR portal by creating an Neww Justice goviolohybmit-and-track-request- conically transmitted within ninety (90) days of the appeal by mail, both the letter and the envelope is al. Please cite the FOIPA Request Number as: You may seek dispute resolution services by the COGIS). The contact information for OGIS is see. National Archives and Records Administrations.	date of my response to your request. If you submit should be clearly marked "Freedom of Information Act signed to your request so it may be easily identified. contacting the Office of Government Information as follows: Office of Government Information on 801 Adelphi Road-OGIS, College Park, Maryland 12-741-5770; toll free at 1-877-684-6446; or facsimile
foipa: headi	westions@thi nov If you submit your dispute N	esolution correspondence by email, the subject ices." Please also cite the FOIPA Request Number
		Sincerely,
		Michael G. Seidel Section Chief Record/Information Dissemination Section Information Management Division
Enclo	sures	
	lentiary Exhibits Page 000800	10/05/2022

Lack of veracity of this letter response: Defendant FBI's ROSENBERG and WEISSMAN first met Lead Plaintiff in the early 1980s and knew him well from dozens of direct interactions as a Trustee and Director of the two organizations they were illegally embedded in, NutraSource and Puget Consumers Cooperative, respectively, while conducting and coordinating illegal general searches in those corporate undercover roles in Seattle, Washington.

Interline Exhibit 19: Defendant Department of Justice Assistant Inspector General Investigations Division Declines Investigation of Defendant FBI, Then Ignores Lead Plaintiff's Follow-Up Letter

November 9, 2021

U.S. Department of Justice Office of the Inspector General 950 Pennsylvania Avenue NW Washington, D.C. 20530-0001

Good day:

I have filed a civil Complaint against DOJ and FBI, among others, related to a long-running series of civil and constitutional rights abuses by the United States. This Complaint relates an on-going series of manipulations by the Defendants and other law enforcement agencies acting in witting or unwitting cooperation with the United States. A copy of this Complaint, filed in US District Court of the District of Columbia is included herewith. I have also attached a list of cooperating and likely cover entities used by Defendants in their pursuit and manipulation of me as Plaintiff.

I will also note that I complained about this matter to Defendants beginning in 2005 with the U.S. Attorney's Office for Westem Washington, and during a personal trip (after documents to be delivered by U.S. mail, UPS and FedEx did not reach their destinations or were missing required proofs of delivery) with a member of the legal team at FBI Headquarters, by hand delivery to DOJ Headquarters, and to the Executive Office of the President, among others. Further, immediately after filing a Complaint in U.S. District Court for New Jersey at Newark in 2010, I was removed from my residence and rendered homeless. That same six unit building had been under FBI surveillance and an alien tenant was removed and deported.

I note that the FBI OIG is conducting a review of undercover entities, some of which may be related to my Complaint and the Defendants' pattern of manipulation and harassment. I am also providing a copy of an NYPD response to my FOIA request under New York State law for your evaluation. Please feel free to share this information with FBI OIG or other OIG operations as you wish.

Kindly review the Complaint and the ongoing series of events and consider careful review of this matter as it is highly likely that similar undertakings against other persons may have resulted in incarceration, injury, destruction of families and businesses, and the death of U. S. persons and others.

Thank you,



DEPARTMENT OF JUSTICE | OFFICE OF THE INSPECTOR GENERAL

Dennis Brewer

January 28, 2022

1210City Place Edgewater, NJ 07020

Dear Mr. Brewer:

This is to acknowledge receipt of your recent correspondence and to thank you for contacting the Department of Justice Office of the Inspector General with your concerns.

Sincerely,

Office of the Inspector General Investigations Division

950 Pennsylvania Avenue, NW, Washington, DC 20530-0001 | (202) 514-3435



DEPARTMENT OF JUSTICE | DFFICE OF THE INSPECTOR GENERAL

March 22, 2022

Dennis Brewer 1210 City Place Edgewater, NJ 07020

Dear Mr. Brewer:

Thank you for your recent correspondence. The U.S. Department of Justice (DOJ), Office of the Inspector General, investigates allegations of misconduct by employees and contractors of DOJ, as well as waste, fraud and abuse affecting DOJ programs or operations.

The matters you raised are outside our investigative jurisdiction, therefore no action can be taken by our office. You may wish to consult the following web page for information on where to submit certain complaints that do not fall within the DOJ OIG's investigative authority: https://oig.justice.gov/botline/non_doj_complaints.

Please be advised that this is the only correspondence you will receive from our Office regarding this matter. Of course, if you obtain new information that involves other allegations or issues regarding DOJ employees, contractors, programs or operations, please feel free to submit that information to us.

Thank you for giving us the opportunity to review your concerns.

Sincerely,

Office of the Inspector General Investigations Division

950 Pennsylvania Avenue, NW, Washington, DC 20530-0001

(20x C) 25

March 25, 2022

Assistant Inspector General for Investigations Department of Justice 950 Pennsylvania Ave NW Washington, DC 20530

Good day -

I received your letter of March 22, 2022, indicating the subjects raised in my complaint were outside your investigative domain. On knowledge and belief, the entire sequence of events involving the financial destruction of Performa, a company I owned in partnership, between 2002 to 2005 was undertaken by FBI. The agency was further involved in improper police powers activities in Boston and New York metropolitan areas summarized below.

The conduct in question is not individual misconduct which can be handled by the agency. Rather, it is institutional misconduct by an agency within the Department of Justice. So, I am requesting official answers to the following three direct and specific questions for potential use in civil litigation already filed against the Department of Justice.

 Is your office stating officially for the record that institutional misconduct by the FBI is outside the jurisdiction of DOJ OIG?

A copy of the revised Complaint 22-cv-00592, now pending before the DC District Court, is attached for your convenience.

For your further investigative development, I offer the following if you wish to proceed to investigate institutional misconduct by FBI. The following sales leads have a common thread beyond TSL, they occurred across state lines in the jurisdiction of numerous field offices and in plants that had no employees present (other than faux employees, all FBI field agents upon knowledge and be lief).

This fact, the complete absence of hourly and other managerial employees, is unlike any other period of sales activity I had undertaken between August 1979 and September 2001. During that period, I was a consultant who conducted and managed hundreds of projects on behalf of management consulting firms and an engineering firm, in a very wide variety of enterprises, as well as an executive in startup and mid-size commercial enterprises.

In other words, I have vastly more experience and knowledge of the customs and habits of such enterprises than any government employee would reasonably be expected to have. I know and understand the territory of commercial enterprises. Kindly refer to my resume in Complaint 22-cv-00592 for more information.

Upon knowledge and belief, FBI Boston arranged the set up of a dummy company, known to me as Technology Sales Leads (TSL), which I visited in downtown Boston during the period that Performa was in business. TSL provided a series of bogus sales leads in the 2003/2004 period for the unstated purpose of conducting a financial starve-out of the company, which resulted in the loss of my personal residence in Kirkland, Washington in the fall of 2005. The residence itself may well have been subsequently

internally destroyed by FBI in a search for some non-existent phantom. Kindly see lines 224 to 248 of the Complaint originally provided to your office.

Sales leads provided by TSL are shown below. None ever closed and converted to revenue projects, unlike my prior 20 year history of 60% to 80% converting to sales revenue while selling and conducting projects and technological products in large scale, mid-size, and startup enterprises.

- 1. Bay State Milling, Boston, MA, software improvement
- 2. Briggs Stratton, Midwest location, information technology
- 3. Badger Meter, Milwaukee, WI
- 4. Raynor Garage Door, Dixon, IL
- 5. First Alert, Aurora, IL, plant operations improvement
- Borg Warner transfer case plant, Muncie, IN, information technology
- 7. Alabama telecom, sales discussion including manufacturing cell visibility system requirement
- Western Digital (CA), manufacturing cell visibility system demo by an alleged VP using the username "Guest"
- 9. Grocery wholesaler, Midwest location
- 10. Orange City IA beef plant, purchasing efficiency
- 11. BioControl, Zoe Schumaker, Lawrenceville, GA, information technology
- 12. Brightstar, Miami, FL, information technology
- 13. Rockwell Collins, Cedar Rapids, IA financial planning
- 14. Rocketdyne Folsom, CA, F-35 e-procurement
- 15. Steel and Pipe Supply, Manhattan, KS, information technology
- 16. Samsonite, near Denver
- 17. Holland Group, Holland, MI

A series of fraudulent checks was also proffered to Performa for work conducted, or at least allegedly conducted during this time period by my partner, or a carefully disguised substitute as he allegedly relocated to Tucson with his wife and subsequently reappeared in the Seattle area, totaling about \$160,000. Perhaps FBI, being so closely engaged with my company through TSL, was unaware of this, or perhaps they were fully engaged. I am unable to investigate this matter further until the discovery phase of my civil complaint, though perhaps it will offer further evidence of institutional misconduct as part of this overall package of destruction.

 Has FBI officially and categorically stated to your office they had no involvement with the Technology Sales Leads Boston boiler room sales leads development and the series of subsequent sales calls involving me and Performa in 2003/2004?

FBI was also involved during my time in Boston as a homeless person in 2006 and 2007, and in the New York City metro area from 2007 to present. I was trafficked by a police powers network I am currently working to identify and subjected to investigation as a terrorist as confirmed by NYPD. This would strike most people as peculiar, given my previous consideration by the Governor of the State of Washington to Chair the Higher Education Coordinating Board for the State of Washington. This Board oversees an agency which has various regulatory authorities over all institutions of higher education in the state. Also, my tenure as the regional Chair of a high technology trade association and personal familiarity to and with members of the leadership of the state's House and Senate may strike some as a bit contradictory to the concept that I was inclined toward terrorism.

Page 2 of 4

3. Has FBI officially and categorically stated to your office that it was in no way involved in any investigation of me as a terror suspect in the state of Washington, the Boston metropolitan area, the New York City metropolitan region, or any other location within or without the United States, between 2001 and the present?

That would stretch credulity well beyond the point of disbelief. I will note again that the landlord of my building informed me that an individual was removed from my seven unit apartment building in Cliffside Park, New Jersey by FBI and handed over to DHS for deportation due to anti-American statements or sympathies while I was a resident there.

Finally, I recommend you carefully review the full extent of my Complaint 22-cv-00592 to determine if you can truly disregard any and all institutional misconduct possibilities by any and all agencies, offices, bureaus of the Department of Justice.

I look forward to your reply to my three specific questions above and to other matters as you wish. I clearly understand your investigations are the confidential domain of the Department. Thank you very much for your attention to this matter.

Since rely,

Dennis S. Brewer 1210 City Place Edgewater, NJ 07020 201-887-6541

Cc: Inspector General Department of Justice 950 Pennsylvania Ave NW Washington, DC 20530

Enclosures:

Complaint 22-cv-00592

Letter to SDNY dated December 6, 2021 (later forwarded to DOJ OIG DC and acknowledged in January 28, 2002 reply)

Letters to SDNY and OIG - Investigations

February 16, 2022

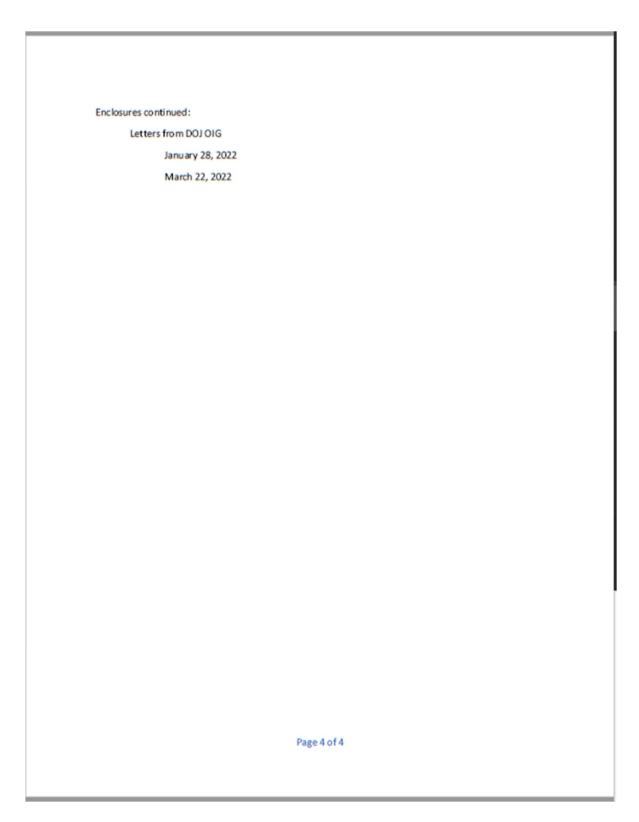
February 28, 2022

March 2, 2022

March 21, 2022

March 25, 2022

Page 3 of 4



Lead Plaintiff has never received a reply to this March 25, 2022 letter to DOJ Assistant IG - Investigations.

572. Based on this pattern evidence, it is profoundly obvious to any reasonable person that discovery will continue to demonstrate this continued pattern of acts, which are completely consistent with the other racketeering patterns in this complaint from prior decades, this time by using these defendants' own still available records. The accumulation of circumstantial evidence of means, motive, and opportunity for, and personal self-interest in, a continuing defendant DOJ and general government cover-up which cover-up is in the direct personal interest of certain senior governmental officials who have and do abuse their roles to sustain that cover-up of their own direct culpability, is profoundly obvious to any reasonable person, and clearly demonstrates both a sustained conspiracy and *mens rea*.

573. Paragraphs 573 through 579 are reserved.

Willful Blindness - Forty Complaint Letters To US Attorney Ignored

580. Willful blindness of defendant DOJ has and does continue including, without limitation, through a long series of direct contacts by the Lead Plaintiff with personnel who were then or later in both defendant FBI and DOJ Headquarters. Lead Plaintff's first in-person complaint to defendant DOJ was in the offices of the U.S. Attorney for the Western District of Washington in 2005 at a meeting - there was no follow-up. Letters and packages to defendant DOJ and to other federal departments and agencies with police powers mailed through the USPS and parcel carriers were blocked from delivery in Summer 2005, then hand delivered to DOJ, FBI, EOP, IRS, and others in Washington, DC in September 2005. No follow up or acknowledgement has ever been received.

581. Information about the acts, violations, and injuries primarily perpetrated by defendants ARMY, CIA, FBI, and USMS, including the malignant effects of the BRMT bioweapon and bioweapon delivery system, constitutional and civil rights violations, and the

associated-in-fact enterprise pattern of racketeering acts and overarching conspiracy, has been communicated to the US Attorney for the District of Columbia in September 2021 (paragraph 682A, LPEEV65-10), and the US Attorney for Southern District of New York beginning in December 2021, a few months after Lead Plaintiff began his forensic analysis in Summer 2021. This analysis continued to progress, and that progress was communicated in writing to SDNY throughout the process, including in over 40 detailed letters through October 2023, hand delivered to the US Attorney SDNY office security checkpoint, together with a curated evidentiary record delivered on two identical USB memory drives addressed to SDNY and to DOJ Headquarters in Summer 2023 (LPEE pages 368-793, LPEEV65-11-16).

- 582. Lead Plaintiff has never received any response to any of these communications.
- 583. Willful blindness by these and other co-conspirator police powers defendants, and by individual defendants in violations of constitutional rights under 28 U.S.C. § 2679(b)(2) and relevant state statutes, by their negligence in compliance and enforcement, violates 42 U.S.C. §§ 1981, 1983, 1985, 1986 neglect to prevent, among other statutes cited herein.

Willful acts, violations, and injuries by these same police powers defendants, including orchestration and facilitation of targeting and public vigilantism through technical hacking and other illegal means, their failures to act, and their direct and resultant impositions of duress on the victims are element of fraudulent concealment under common law and thereby invoke equitable tolling (paragraphs 314-321, citing *Rotella v. Wood*, 528 U.S. 549 (2000)).

- 584. Fraudulent concealment and willful blindness are the **fifth** of these defendants' five basic illegal patterns of practice.
 - 585. Paragraphs 585 through 592 are reserved.